

## 1 The Birth of the Quality Agencies

With the goal of improved economic performance, each Government since the publication of the Robbins report in 1963 has successfully sought the expansion of the higher education sector. From 113,000 students in the system in 1961-62, numbers have grown to 909,300 in 1985-86, 1,408,800 in 1992-93 and 2,496,645 in 2011-12: a 22 fold increase in just over 50 years (HESA, 2013). As the number of students has grown, however, so too has the amount of public resource required to fund them and the need to ensure that such funds are used effectively. Following a period of economic decline, the 1980-81 to 1983-84 spending round saw a 15% cut in the funding for higher education coupled with a continuing expansion of student numbers. Under such financial pressure it was clear that quality could suffer. In 1983 the Society for Research into Higher Education reported that higher education institutions:

...may in the future find themselves under pressure to compromise academic quality in attempting to maintain student numbers or earn income from other sources. Some coordination of arrangements is desirable to try and ensure, for example, that academic standards for similar activities do not diverge too widely between institutions.  
(SRHE, 1983, pp.14-15)

The concern was shared by the Secretary of State, Sir Keith Joseph, who in the same year wrote to the University Grants Committee (UGC) asking them to assess how standards were currently being maintained and enhanced and, in the context of a more efficient use of resources in universities, to explore the possibilities for maintaining and improving academic quality in the future. This led to the establishment of the 'Reynolds Group' by the Committee of Vice-Chancellors and Principals (CVCP) to 'study and report on institutions' methods and for maintaining and monitoring academic quality and standards' (CVCP, 1986, p.10). The group's report contained three formal codes of practice in addition to 'points of reference' for institutions undertaking self-comparisons concerning the maintenance and monitoring of standards. Following further encouragement from the Secretary of State, now Kenneth Baker, this in turn led to the CVCP's somewhat reluctant establishment of the self-regulatory Academic Audit Unit (AAU), designed to provide a more permanent oversight of universities' standards and quality control, which commenced operations in 1990. This contrasted with the more rigorous quality measures existent in the 'public sector' where degrees were awarded by the Council for National Academic Awards (CNAA) and diplomas by the British Technology Education Council (BTEC) only after course (later institutional) validation in addition to their provision being subject to inspection by Her Majesty's Inspectorate (HMI).

The 1988 White Paper established the Polytechnics and Colleges Funding Council (PCFC) and the Universities Funding Council (UFC) who would no longer fund institutions through grants but rather would operate a system of contracting. Ostensibly formed to drive the sustained expansion of higher education and the continued 'efficiency gains' necessary to fund it, the PCFC 'nationalised' the polytechnics, removing ownership from local authorities, as the universities were similarly being removed from the protected autonomy of the UGC (Jenkins, 1995). The Government's stated intention was to:

- encourage institutions to be more enterprising in attracting contracts from other sources, particularly in the private sector, and thereby to lessen their present degree of funding on public funding

- sharpen accountability for the use of the public funds which will continue to
- be required
- strengthen the commitment of institutions to the delivery of the educational services which it is agreed with the new planning and funding body they should provide.

(DES, 1987, paragraph 4.17)

Furthermore, in 1990 a cost neutral increase in tuition fees and decrease in block grant funding (both ultimately paid for by Government) now made it more lucrative to attract additional EU students as well as non-EU students who had been full fee paying since 1979 (the unfettered expansion of higher education was slowed three years later however when limits were imposed on the number of funded places available at each institution).

The 1991 White Paper *Higher Education: A New Framework* (DES, 1991) detailed the Government's plans for a still larger and more cost-effective higher education sector, responsive to the needs of industry, to continue to support the drive for economic growth. The White Paper declared that UK higher education was 'more efficient and more effective' than ever before and that recent growth, seeing one in five of all 18-19 year olds now entering higher education compared to one in seven in 1987, had occurred without a decline in quality evidenced by a steady increase in the proportion of first and second class degrees awarded (DES, 1991, p.3). The claimed maintenance of quality was allegedly possible due to the utilisation of capacity 'at the margin', mostly in the 'public sector' institutions who, at the cost of a drastically reduced unit of funding which had fallen to almost half that of universities by 1985-86 before recovering parity in 1990-91 (Watson & Bowden, 1997), now educated more students than the university sector (DES, 1991). Others would strongly disagree: Stevens (2005) claims a gradual decline in standards since 1970 was not slowed until the Blair reforms of 2001; only 28% of Vice-chancellors surveyed in 1993 felt that degree standards were being maintained (THES, 1993a) and the reliance on the number of first and second class degrees awarded as a measure of quality ignored the possibility of grade inflation incentivised by increased competition, a continued pattern which drew the ire of the House of Commons Innovation, Universities, Science and Skills Committee 18 years later.

Regardless of the contemporary state of higher education, if the expansion was to continue without quality suffering, further efficiency gains would be needed. Increasing competition and the marketisation of the sector was seen as the best way to deliver this. In keeping with the wider Government policy at the time, the White Paper stated that:

The Government believes that the real key to achieving cost effective expansion lies in greater competition for funds and students. That can be best achieved by breaking down the increasingly artificial and unhelpful barriers between the universities, and the polytechnics and colleges.  
(DES, 1991, p.12)

First, 'public sector' institutions were now, under certain criteria, able to adopt the title of 'university' and award their own degrees in place of the CNAU which was to be disbanded. Second, national funding councils responsible for funding all higher education teaching in universities, polytechnics and colleges were to replace the PCFC and the UFC.

Whilst the goal of an expanded, more cost-effective higher education sector had clear benefits, increased student numbers, enhanced competition, a reduced 'unit of resource' funding, and structural changes all posed clear risks to quality. Moreover, as the sums of public money invested in the sector grew, so too did the demand for accountability. The White Paper continued:

The prime responsibility for maintaining and enhancing the quality of teaching and learning rests with each individual institution. At the same time, there is a need for proper accountability for the substantial public funds invested in higher education. As part of this, students and employers need improved information about quality if the full benefit of increased competition is to be obtained.

As demand for higher education expands further, and as competition among institutions increases, as a result of the changes outlined in the preceding chapters, the Government considers that new arrangements for quality assurance in higher education will be required.  
(DES, 1991, p.24)

Perhaps in more candid terms, George Walden, a former Higher Education Minister, put the matter astutely:

The danger of overstretching the capability of institutions to absorb extra students was not unforeseen when expansion was discussed in the mid-eighties. It would be a simple-minded Government who thought you could cram in more students indefinitely without risk to quality ... Only market romantics seriously believed that, by a combination of belt tightening, better management, better teaching with modern methods, and attracting private money and foreign students, the value of a University degree in a hugely expanded system could continue unimpaired.  
(Walden, 1996, p.122)

The Government therefore had to determine, in addition to academic audit, to what extent the additional assurances provided in the 'public sector', where state bodies had the ability to stipulate specific external examiners and the undertake of inspections, would be amalgamated with the more laissez-faire approach adopted by universities, where the widespread practice of having self-selected external examiners in place was merely recommended by a code of practice. Both quality audit, defined as 'external scrutiny aimed at providing guarantees that institutions have suitable quality control mechanisms in place', and quality assessment, defined as 'external review of, and judgements about, the quality of teaching and learning in institutions', were deemed necessary to provide stakeholders with sufficient information concerning quality to ensure the full benefit of enhanced competition was realised (DES, 1991, p.24). Recognising the importance higher education institutions attached to their academic freedom, in no small measure a result of the sector's lobbying powers, the Government proposed the quality audit role should be carried out by a single quality assurance body owned by the institutions; however, the Government reserved the powers to establish a body of their own should institutions fail to do so satisfactorily. The Government believed any doubts over the effectiveness of the self-regulatory body would be offset by the institutions' self-interest in demonstrating the rigour of their internal controls; failure to do so would result in a loss of reputation in a competitive national and international higher education market and would lead to the statutory regulation of academic standards. Far more salient, however, would be the work of the quality assessment units within each funding council whose assessments of what is actually provided would result in the award of an institutional quality ranking of 'excellent', 'satisfactory' or 'unsatisfactory' and inform the council's funding decisions. Quality was to be assessed via what was to become known as the Teaching Quality Assessment (TQA) in two ways: quantitative performance indicators and value-added calculations would provide an overview whilst external judgements based on direct observation of teaching and learning, management and organisation, accommodation and equipment would provide a more comprehensive view of quality (Brown, 2004).

## 2 The System's Reaction

Overall reactions to the White Paper from representative bodies were largely positive. The Committee of Directors of Polytechnics (CDP) were delighted by the prospective end to the binary divide between universities and their own institutions and were keen to see the legislation passed before the impending general election. Despite suggestions by some CDP members that they should embrace the new quality regime as a means to demonstrate their superiority in teaching over the existing universities, largely unsuccessful attempts were made to water down the quality assessment proposals (Brown, 2004).

In their formal response to the White Paper the CVCP also supported the abolition of the distinction between universities and polytechnics and colleges and welcomed the Government's invitation to discuss how best a new quality assurance regime might operate. They were, however, less enthusiastic about the assessment regime stating that 'the prime responsibility for the maintenance and enhancement of quality must rest with the institutions, reinforced by the constructive criticism of the quality audit unit'. The CVCP proposed alternative was for assessment units comprised in part by practitioners seconded for 'up-to-date knowledge of their subject' (CVCP, 1991, p.5).

Later in 1991, a working group of institutional heads from the CVCP, CDP and Standing Conference of Principals (SCOP) was formed to determine proposals for the quality regime. The results, sent to the Department for Education and Skills (DES) in October, acknowledged the institutions' collective responsibility for adequate systems of quality assurance across the sector and the need for a strong quality assurance body to 'provide both necessary public assurance of institutional quality and act as an additional input to a pluralistic assessment of quality in higher education' (CVCP, CDP, SCOP, 1991, para 5.vi) but raised concerns over duplication between the proposed quality assurance body and the quality assessment units contained within national funding councils. It was strongly felt however that, whilst there was a clear need for funding councils to have access to quality information, this should remain independent from the funding operation. Peter Knight, the Vice-Chancellor of the University of Central England, was more forthright in his criticism declaring the quality system as 'the most fundamental threat to academic freedom that higher education has ever effected ... The one place judgements about quality should never be is in the hands of the funders. It gives them control of body and soul' (THES, 1993b, p.1).

The representative bodies recommended a 'steering committee' populated in the majority by representatives from institutions to advise on and approve the audit unit's annual work programme. As discussions continued the *Further and Higher Education Act* (1992) received a relatively smooth parliamentary approval. In keeping with the White Paper, the assessment councils within each funding council were established by section 70 which stated that each funding council should:

- (a) Secure that provision is made for assessing the quality of education provided in institutions for whose activities they provide, or are considering providing, financial support under this part of this Act, and
- (b) Establish a committee, to be known as the 'Quality Assessment Committee', with the function of giving them advice on the discharge of their duty under paragraph (a) above and such other functions as may be conferred on the committee by the council.

The need for quality assurance was somewhat more opaque, stated in section 82:

- (2) Any two or more councils shall, if directed to do so by the Secretary of State, jointly make provision for the assessment by a person appointed by them of matters relating to the arrangements made by each institution in Great Britain

which is in the higher education sector for maintaining academic standards in the institution.

*(Further and Higher Education Act, 1992)*

Only minor objections were raised concerning quality arrangements, most notably Baroness Blackstone, at the time Master of Birkbeck College and later the Minister for Education, who felt that housing the quality assessment body in the funding councils was 'deeply flawed' and proposed a single, more rigorous, independent, UK-wide body 'with duties to undertake [both quality assurance and audit] work and report on it, rather than tagging on a responsibility for the funding councils to set up committees' (HL Deb, 1991, §1117). This was rejected at the time, although adopted five years later, on the grounds that the funding councils were best placed to make decisions on the allocation of resources if they had first-hand experience of the quality of the institutions they were awarding; moreover, the audit was a vital part of academic freedom and the higher education institutions should retain their power to assure themselves of their quality (HL Deb, 1991).

Following discussions between the representative higher education bodies and DES, the Higher Education Quality Council (HEQC) was incorporated as a limited company, owned by the representative bodies, in May 1992 as the quality assurance body for higher education in the United Kingdom. The Board of Directors constituted of an equal number of university and polytechnic heads, two college representatives and two (later increased to four) independent members. Membership of the body was a condition of receiving public funds from the funding councils and subscriptions were to be deducted up front from institution's allotted funds from their funding council.

### **3 Dissatisfaction with HEQC, Quality Assessment Councils, and the establishment of the Quality Assurance Agency for Higher Education (QAA)**

The HEQC's initial approach to quality audit was a continuation of the AAU approach; three unaccompanied peer auditors would visit an institution for three days and use 'primary documentation' to focus on four main areas: the provision and design of course and degree programmes, teaching and communication methods, academic staff, and means of taking account of external examiners' reports and the views of students and external bodies. The resulting report, which reviewed quality arrangements not against a national standard but rather the institution's own goals, would remain the property of each university (CVCP, 1992; Brown, 2004). Subsequent incremental changes, including the extension of audits to include universities' collaborative and overseas provision, took place alongside the development of the 'Graduate Standards Programme' instigated by the Secretary of State's concerns over academic standards, in part raised by a visit to Singapore and Malaysia where he received a number of complaints over the practices of British institutions attempting to recruit international students, in 1994. In conjunction with the CVCP, HEQC would establish a set of threshold, or minimum acceptable, standards the assurance of which would see 'broad comparability' within a diverse sector; however, the end of HEQC shortly after the consultation on the Graduate Standards Programme was complete meant that it was not enacted.

From 1992 to 1995 the funding councils' approach to assessment saw subject areas within universities declare whether their performance against their own aims and objectives (and not a universal standard or threshold) was 'excellent', 'satisfactory' or 'unsatisfactory'. Of the 972 self-assessments, 553 were then followed-up by peers who provided their own judgement on whether the quality of provision against the university's own aims and objectives was 'excellent', 'satisfactory' or 'unsatisfactory'. The remaining 419 cases had their declaration of 'satisfactory' accepted without review. At this stage it noted that 'there is a danger that the costs of the whole exercise to the system, both to the funding councils and to

the universities, will exceed the funds affected by the outcome' (Wagner, 1993; 281). Again, following the Secretary of State's concern over standards in 1994, the process was reviewed and, in addition to the value for money and quality improvement, a third purpose of providing accessible information on the quality of education was assigned to assessment. Following an evaluation of the assessment process by the Centre for Higher Education Studies (CHES, 1994) visits were extended to cover all institutions and departments and judgements of 'excellent', 'satisfactory' or 'unsatisfactory' were replaced by a score of 1 (the lowest) to 4 (the highest) for each of six core areas leading to a published overall profile of judgements containing a score out of 24.

Almost as soon as HEQC and the funding councils began their work, however, concerns were being raised over the efficacy of, and burden created by, the dual quality assurance and assessment regime. Later in 1992 Dr Malcolm Frazer, Chief Executive of HEQC, stated it would be better 'if quality was not in the hands of the funding council or the HEQC' and that, when the binary divide between universities and polytechnics and colleges ceased, he had hoped 'we would have an independent accrediting body which would accredit at both institutional level and course level' (Brookman, 1992). In December the *Times Higher Education Supplement* started its 'Quality Debate' series with the article 'Quality Assurance Arrangements are Going Wrong' (THES, 1992). Articles such as 'V-Cs Slam Red Tape' reporting 'a rising tide of protests by institutions who say they will be bogged down by bureaucracy' (THES, 1993c, p.3) represented the majority view captured in a phone survey of vice-chancellors published later that month which reported that 82% condemned the existing quality arrangements and 71% said there should be a single quality body (THES, 1993a). Assiduous criticism was focused at the potential burden resulting from the new regime, especially from the quality assessment work to be undertaken by the funding councils and the perceived deluge of repetitious and overlapping paperwork. The lack of confidence in the system was perhaps best illustrated by the admission of the Chief Executive of the Higher Education Funding Council for England (HEFCE) that, once they published their first critical quality assessment, he expected the council to be taken to judicial review. Condemnation of the system was not universal however: 58% of vice-chancellors agreed that quality assurance and assessment were useful guides to progress whilst some argued that an effective quality assurance regime would promote good practice and reassure students and the public whilst imposing a minimal burden (THES, 1993a; Foster, 1993).

The overarching criticism of the assurance process was that it was not clear who the process was assuring about what. Audit is based on the fundamental assumption that improvement is best achieved through the internalisation of best practice approaches and the intrinsic professional motivation to provide the best possible service. Conversely, assessment is based on the fundamental assumption that improvement is best achieved through the determination of performance information and the associated rewarding of resource (Brown, 1997).

The specific objections to the assessment process were well documented and numerous; it was alleged that the system imposed excessive demands on institutions with a substantial proportion of the costs of both assurance and assessment being transferred from the Government on to providers. The burden of these exercises was far greater than universities had expected or experienced previously. Moreover, it was argued that academic freedom and autonomy were being violated, by the imposition of a culture of compliance and 'hard-managerialism'. This could lead to managerial intrusion into academic matters, emphasising presentational and procedural matters at the potential expense of intellectual substance, and failing to differentiate sufficiently between outcomes to justify the use of scarce resources. All of which could harm Britain's well-earned reputation for quality (Wagner, 1993; Watson, 1995, p.328; Brennan et al, 1997; NCIHE, 1997).

Whilst many did their best to rebut these accusations and proclaim the benefit of assessment, including many departments introducing quality assurance procedures with external assessors for the first time, a substantial number of academics exploring other departments and experiencing new methods of teaching, and the publication of independent, reliable quality information proving useful for staff, students and employers (Clark, 1994; Watson, 1995), the pressure built and, in 1994, the new Secretary of State, Mrs Gillian Shephard, asked the HEFCE Chief Executive, Professor (now Sir) Graeme Davies, to work with the representative bodies to determine how audit and assessment could be combined to form a single quality system.

Shortly afterwards, in a speech to the CVCP Committee, Mrs Shephard detailed her requirements for the unified system. It must:

- Provide assurance that standards of degrees are maintained and are broadly comparable – which does not mean identical – and that the quality of teaching and learning is such that students have the best opportunities of reaching those standards.
  - Be transparent so that it can assist in enabling choices to be made by universities and colleges themselves in deploying their resources in full knowledge of their strengths and weaknesses; potential students about university and course; employers in recruiting graduates; and also in the deployment of public funds both by the Government and the funding council.
  - Respect academic autonomy whilst having an external element.
  - Respect academic diversity and freedom while at the same time addressing value for money and public accountability.
  - Encourage the enhancement of quality and dissemination of good practice.
  - Be cost-effective and avoid unreasonable burdens on institutions.
- (Shephard, 1994) reported in (Brown, 2004).

In March 1995 Professor Davies shared an options paper with the CVCP proposing a number of ways a unified system could work. The paper reflected that for it to provide sufficient accountability and information, such a system must be assessment-based although some internal membership of assessment teams would be acceptable and allow for a 'lighter touch'. The proposals were rejected by the CVCP council and Dr Edwards, Chair of the CVCP, wrote to HEFCE to propose an alternative approach based on subject-level evaluations of teaching quality with external members accredited and approved by a single agency. Both the CVCP and HEFCE reacted positively and agreed they would provide a basis for further discussions. Despite Dr Edwards' recommendation of the subsequent proposals which maintained the need for external control of assessment, they were rejected near unanimously by the CVCP.

Following proposals by HEFCE which would potentially impact on their resources, in July 1995 HEQC published their own proposals for a new approach to be carried out by a single quality agency. The new body would see regular internal reviews of courses undertaken by a team containing two external assessors working to a national template to 'ensure that academics do not pat themselves on the back' (THE, 1995) in addition to an external evaluation of the whole institution every five or six years resulting in a published institutional quality profile. The following week the CVCP also published its own similar proposals for subject assessment and institutional audit. The assessments would be undertaken by a mixture of internal and external assessors with the external assessors being drawn from a new agency led by the sector and demonstrably independent from the Government and its agencies. This would lead to a published and graded quality profile; moreover, the funding council would be able to perform its own scrutiny if it was not satisfied with any part of the process for an institution.

HEQC's proposals were not taken forward, however, and the CVCP proposed the establishment of a Joint Planning Group (JPG) with HEFCE to further develop their own ideas. Gillian Shephard welcomed the proposals but struck a note of caution: she detailed that costs and benefits should be established and compared to the existing regime; the timeframe for subject reviews should be not exceed two years to allow the funding council, potential students and employers to make comparisons; and 'In respect of assessment at least, I could not contemplate a solution which relied mainly on self-regulation' (Shephard, 1995).

The JPG was convened in September 1995 and, just five months later, the National Committee of Inquiry into Higher Education (NCIHE) or the 'Dearing Committee' was established by the Secretary of State to 'make recommendations on how the purposes, shape, structure, size and funding of higher education, including support for students, should develop to meet the needs of the United Kingdom over the next 20 years' (NCIHE, 1997: 3). This would necessarily explore how to fund the continued expansion of the higher education system whilst maintaining or improving academic standards. Running parallel to the Dearing Committee, the JPG published its first report in April 1996. The report detailed an integrated approach consisting of two elements: first, the 'subject review' approach operated by HEQC would continue as before but take account of how the department in question assured themselves that the necessary comparative standard had been met for the attainment of an award; second, institutional audit or 'review' as it was labelled (JPG, 1996a). The subsequent reaction from institutions was negative; it was felt that the key issue, the burden of the quality regime, had not been resolved. Furthermore, there was no substantive increase in self-evaluation.

Another report followed shortly after which proposed a six-to-eight-year institutional quality assurance plan to be agreed between the agency and each institution. This would enable institutions greater control in the planning, timing and number of subject-level assessments within a national framework. Internal members would be able to observe these assessments, but would not be able to actively participate in them. These assessments would then form the main source of evidence for institution-wide reviews focusing on the management of quality. The Department raised concerns that the proposal saw too great a reduction in the intensity of visits by external teams whilst, conversely, institutional representatives remarked that it did not provide a reassurance on the desired reduction of costs and burden nor did it put enough of the management of the process into the institutions' hands. Prior to the next meeting of the JPG, intense lobbying took place. The Chief Executive of the CVCP was keen to see the option for assessment to be undertaken internally if the new agency agreed and for institution-wide review, if it must be done, to be carried out by private consultancy firms. Alternatively, some members saw institutional reviews as vital; subject assessments would not have the necessary scope to cover areas such as off-campus provision and it was institutions, not subjects, that awarded degrees and therefore institutions that should be held to account.

The final report circulated to the JPG noted that the majority of members were in favour of institutional review once in each eight year cycle and that all of HEQC's functions, including quality enhancement, should be transferred to the new agency (JPG, 1996b). In November 1996, at the JPG's final meeting the proposals were approved along with a budget of 80 per cent of the total for HEQC and the funding councils' quality assessment divisions. The Quality Assurance Agency for Higher Education (QAA) was subsequently incorporated as a company 27 March 1997, four months prior to the publication of the Dearing report, and took over the HEQC's staff and functions on 1 August 1997. The new agency's board was made up of four members representing higher education institutions, four members representing the funding councils, and six independent members. Whilst legally owned by the representative bodies, QAA was legally independent with a majority of its board members



coming from elsewhere. This represented a shift away from pure self-regulation and towards a partnership between the state and the institutions.

## **4 The Dearing Report**

The comprehensive 1,700-page Dearing report was published in July 1997 containing 93 executive recommendations. The key recommendations of a flat-rate, non-means tested tuition fee and means tested maintenance grants were, by tacit agreement with the opposition Labour party, 'kicked into the post-election long grass' (Stevens, 2005); however, their suggestions regarding quality were more openly received. The report stated the need for the standards of institutional awards to be maintained and recommended that QAA provide benchmarking information and create a 'National Qualifications Framework' allowing it to 'ensure that diversity is not an excuse for low standards or unacceptable quality' (NCIHE, 1997, p.143). The framework would detail what could be expected from each level of higher education award, regardless of the provider of the award, and a more detailed description of the skills and competencies associated with award holders. QAA should then 'work with universities and other degree-awarding institutions to create, within three years, a UK-wide pool of academic staff ... from which institutions must select external examiners' (NCIHE, 1997, p.373) who would validate whether programmes met agreed standards for a level of award.

## **5 The Evolution of QAA**

Since its establishment there have been four major phases in the life of QAA. First, it was established with the aim of reducing the burden on providers by combining the quality assurance and assessment bodies. Whilst continuing the TQA and institutional audit work of its predecessor bodies, QAA sought to find a method which effectively combined its assessment and audit roles. It published its first consultation paper on its new approach in March 1998 which broadly followed the suggestions of the Dearing report: a pool of registered external examiners would check against a national standards framework as part of an approach which would allegedly have a 'lighter-touch' overall, either through less frequent reviews or a reduced review intensity when it does occur (QAA, 1998a). Two years previously HEQC had consulted on a similar approach where external examiners, registered on a national database, would ensure the comparability of standards; the approach was abandoned, however, after a significant minority of universities objected on the grounds of the resources that would be required (HEQC, 1996). Five months later, following a second negative reaction to the suggestion of registered external examiners the idea was withdrawn; however, the idea of benchmarking and programme specifications, equally unpopular with the sector (see, for example, Wolf, 1998), was continued due to the positive reaction of students and employers to the consultation (QAA, 1998b).

The QAA second-phase consultation was launched in October 1998 and, following protracted and challenging negotiations between QAA, the Department for Education and Employment (DfEE), HEFCE and the representative bodies, an agreement resulting in a system more comprehensive than those it had replaced was reached for England. The new approach would entail 'Programme Reviews' which would result in a threshold judgement concerning programme outcome standards (i.e. were intended programme outcomes appropriate, were they achieved and if so were they maintainable?) and graded judgements of 'commendable', 'approved' or 'failing' for a number of aspects of learning opportunities. In addition to Programme Reviews, Institutional Review would examine the management of institutional standards and result in the identification of areas where it was essential, advisable or desirable for the institution to take action along with an overall judgement of confidence. The new methodology, detailed in QAA's *Handbook for Academic Review* (2000), was far more comprehensive than those it had replaced; there were to be qualifications frameworks for every award, programme specifications for every course,

benchmarks for every major subject, and codes of practice for each aspect of quality assurance (Brown, 2004). The approach was introduced in Scotland in October and was scheduled for implementation 12 months later in England; however, the process was to be short-lived and QAA would soon enter its second phase.

The drive for closer attention to be paid to academic standards was led by QAA's first Chief Executive, John Randall, who had vast ambitions for the inspection of higher education institutions and in 2000 wrote:

Subject benchmark information, programme specifications that spell out outcomes to be achieved, and a qualifications framework based on clear and explicit descriptors of level are the new means of defining standards in higher education. Together, they have a function similar to that of a code defining professional standards, in that they tell the individual client (the student) and the wider interested public (especially the employer) what they can reasonably expect from a professional service. Universities and their teachers must deliver to those standards if they are to convince the world that they are true professionals.  
(Randall, 2000, p.166)

In March 2001 the then Secretary of State, David Blunkett, announced a 40% reduction in the volume of external review activity with departments that had scored highly in their last assessment becoming exempt from the next round. The reason for the announcement by the Secretary of State resulted from a number of factors: in August 2000 a PA Consulting report commissioned by HEFCE put the annual cost to the sector of subject reviews at £30 million (PA Consulting, 2000), in January 2001 economists from the University of Warwick which had scored full marks in their recent subject review bitterly attacked the process (Harrison et al, 2001), Number 10 was being lobbied by a group of prominent Russell Group vice-chancellors, and, in the same month, the academic board of the LSE determined to 'secede from [its] engagements with the QAA' which it believed had 'infringed academic freedom, imposed its own bureaucratic and pedagogical agenda, neglected students' intellectual development and used incompetent and unprofessional reviewers' (THES, 2001). All these tensions were in evidence in the House of Lords on the evening following the Secretary of State's announcement when a debate was initiated by Lord Norton of Louth, a Professor at the University of Hull, and supported by other prominent peers on the complex and bureaucratic regulation of higher education (HL Deb, 2001). HEFCE, not QAA, was tasked with leading the development of a new, less burdensome approach and, facing a reduction in subject-level assessment to an amount he considered unacceptable and, more importantly, wishing to take quality assurance in a different direction to HEFCE and Universities UK (UUK), John Randall resigned in August 2001.

The following year, shortly before QAA was to publish its revised approach, the Better Regulation Task Force, part of the 'New Labour' Government's drive for more targeted, less-burdensome regulation published *Higher Education: Easing the Burden* (BRTF, 2002). It too argued that higher education institutions were over-regulated, the main reason for this being a lack of co-ordination between agencies, and recommended the strengthening of the funding council's HE Forum to provide a 'gatekeeper role to prevent unnecessary new burdens being placed on HEIs' (BRTF, 2002, 11).

Without universal application, 'Programme Review' was no longer an appropriate basis for a comprehensive regime. Having some programmes and institutions publicly judged against standards whilst the majority weren't would provide a piecemeal and confusing view of quality. A new approach of institutional-level review, based on audit, was proposed with assessments only undertaken on a highly selective basis where audit revealed concerns. In

transitioning to the revised approach assessments would continue, covering up to a maximum of 10% of the institution's students. 'Principal' judgements were then made on:

- The level of confidence that can reasonably be placed in the soundness of the institution's management of the quality of its programmes and the academic standards of its awards; and, through direct scrutiny of primary evidence, whether the institution is securing acceptable academic standards and quality;
- The level of reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that an institution publishes about the quality of its programmes and the standards of its awards.

There was a price to be paid for the reduction in the quality burden however, a greater amount of quality information about each institution was now to be published, including external examiners' reports. Following a consultation, QAA published its *Handbook for Institutional Audit* (2002) and the first of the new audits took place in February 2003. The Scottish took a slightly different approach and agreed to institutional audits less the 'discipline audit trail' assessments, an internal subject review process and a separate quality enhancement process. Following a consultation the *Handbook for Enhancement Led Institutional Review: Scotland* was published by QAA in April 2003. The Welsh institutions and funding council also took the opportunity to reflect on the quality arrangements in England and opted for a revised, more enhancement-based approach without the requirement to publish external examiners' reports or internal reviews.

The quality assurance regime then remained relatively steady up until 2009 whilst publicly available information on higher education expanded rapidly. A fairly extensive set of information was made available on the Teaching Quality Information website, now Unistats, in late 2004. The National Student Survey (NSS) was first run the following year and the results made available online. Throughout this time a number of high-profile quality failings occurred both in the UK and overseas, many highlighted by QAA themselves. London Met were discovered to be offering modules in curry making and kite flying (THES, 2002); the University of Luton had unsupervised recruitment agents in Bangladesh, Pakistan, India and Nigeria making admission decisions including waiving entry criteria (THES, 2005c); the University of Humberside were accused of having a branch in an Israeli petrol station and issuing 5,500 bogus degrees (MacKinnon & Norfolk, 2004); Leeds Met allowed 'practical avoidance of challenging modules' (THES, 2005a); and De Montfort increasing grades in pharmacy by 14 per cent (THES, 2005b). The reports of quality failings culminated in a critical report by the House of Commons Innovation, Universities, Science and Skills Committee (IUSSC) in 2009 which expressed concerns over low and declining academic standards in some areas of the UK higher education system and challenged QAA's existing practices.

The ongoing battle between self-regulation and academic freedom and an external agency prescribing standards was once again resumed with the committee making strong recommendations for change at QAA which it called short of being abolished and being replaced by a new body only on the grounds that 'the inevitable hiatus, disruption and costs caused by the abolition of QAA and establishment of a new body would not serve the best interests of students, universities and the taxpayer' (IUSSC, 2009, p. 97). The committee disagreed with QAA's Chief Executive's, Peter Williams, view that process and outcomes 'were very strongly linked' (IUSSC, 2009, p.94) and stated that 'in not judging the standards themselves, QAA is taking an unduly limited view of its potential role' (IUSSC, 2009, p.97). The committee recommended that QAA was to be reformed and re-established as a 'Quality and Standards Agency' which:

- Had a duty to safeguard, and report on, standards in higher education in England.

- Should be half funded through HEFCE and half from levies on higher education institutions in England to ensure its independence.
  - Should review and report on the quality of teaching in universities and, where shortcomings are identified, ensure that they are reported publicly and addressed by the institutions concerned.
  - Have powers to carry out reviews of the quality of, and standards applied in, the assessment for an institution's courses, including, if necessary, its degree awarding powers, in response to external examiners' or public concerns about the standards in an institution or at the direction of the Secretary of State.
- (IUSSC, 2009)

Were fundamental changes to the operation of QAA not achieved within two years, the 'QAA/Quality and Standards Agency should be abolished and an entirely new organisation be established in its place' (IUSSC, 2009, p.97). Subsequently, a number of changes were made and, in 2011-12, the 'Institutional Audit' methodology was replaced by the 'Institutional Review' (QAA, 2011): four areas would now be scrutinised by reviewers instead of two; the resulting judgements would fall into four, not three, categories; students would become full members of review teams; and there would no longer be a fixed programme of reviews but instead a more responsive rolling programme (Brown and Carasso, 2013).

Within two years the new Coalition Government had tripled the maximum tuition fees in England to £9,000 and published the White Paper *Students at the Heart of the System* (DBIS, 2011). The marketisation of higher education continued with the introduction of increased tuition fees which, for the majority of courses, now covered the full cost of teaching and were not combined with a block grant to institutions, the lowering of barriers to entry into the higher education market, and the introduction of further information provision requirements. Reversing the direction of travel set by the IUSSC two years ago, *Students at the Heart of the System* proposed:

...a genuinely risk-based approach, focusing QAA effort where it will have most impact and giving students power to hold universities to account. All providers must continue to be part of a single assurance framework. But we would explore options in which the frequency – and perhaps need – for a full, scheduled institutional review will depend on an objective assessment of a basket of data, monitored continually but at arm's length. For new providers, with an inevitably shorter track record of quality, a more regular and in-depth review is appropriate than has previously been applied. Conversely, for those providers with a sustained, demonstrable track record of high-quality provision, we would expect to see significantly less use of full institutional reviews.

(DBIS, 2011, 3.19, p.37)

The White Paper asked HEFCE to consult on the criteria for assessing risk and the resulting frequency and intensity of reviews 'with a view to achieving very substantial deregulatory change for institutions that can demonstrate low risk' (DBIS, 2011, p.37). Ad hoc triggers which could prompt an otherwise unscheduled review by QAA would also be subject to consultation. Following their consultation, Alan Langlands, the Chief Executive of HEFCE, wrote to Anthony McClaran, Chief Executive of QAA, inviting QAA 'to implement a more risk-based approach of the quality assurance of higher education in England' with a view to implementing the revised approach during the 2013-14 academic year (HEFCE, 2012, p.1). The revised approach should target QAA's efforts where they were most needed and tailor external reviews to the individual circumstances of providers being reviewed. Institutions whose two previous institution-wide reviews were regarded as successful should be reviewed every six years. Institutions who were either not successful in their last two reviews, who had not yet been reviewed twice, had concerns upheld about the quality of their provision following a full inquiry under QAA's concern scheme, or had undergone

significant managerial change should have their next review take place four years after the previous one.

## **6 Conclusion**

Quality assurance agencies have developed over the past 30 years for a number of reasons. First, a continuous 'marketisation' of higher education, seen as the most efficient means of achieving high standards, and an increasing reliance on institutions being able to attract students to survive has introduced increased risks to quality including low standards and grade inflation. Second, the number of students has increased dramatically; whilst one in seven further education leavers entered higher education in 1987 nearly one in two, 2.5 million students, entered higher education in 2011. With the increase in student numbers has come an increase in public expenditure, £15 billion in 2009-10 (DIUS, 2009), and with the need for increased accountability. Third, since universities were brought under central control in the late 1980s, the political fortunes of the party in power have become aligned with the performance of the higher education sector. Politicians have a more direct incentive to ensure quality is being maintained or improved.

QAA itself was deemed necessary as its predecessors, HEQC and the Quality Assessment Councils, were perceived as overlapping and too burdensome. QAA has since been through a number of phases itself suffering from the competing demands of 'low burden' oversight and respecting academic freedom on the one hand, and comprehensive standard setting and assessment on the other. Initially it struggled to fulfil its remit of combining audit and assessment effectively whilst reducing the burden imposed on higher education institutions. The Secretary of State subsequently demanded a 40 per cent reduction in burden and a 'lighter touch' approach focusing on audit was introduced. The pendulum then proceeded to swing back the other way and, following a critical IUSC report (2009), QAA was deemed not to be doing enough to define and enforce standards. The latest, more risk-based approach, is an attempt, to some extent, to balance the demands of 'lightness of touch' with robust quality assurance. Resources will be focused on providers who pose the greatest risk to quality whilst those who have shown themselves able to perform well will be rewarded with a reduced burden. This is to be combined with increasing 'consumer' power with more information available than ever before driving prospective students to the best providers.

## **7 Summary of Major Events**

- 1983** The Secretary of State, Sir Keith Joseph, writes to the University Grants Committee (UGC) asking them to assess how standards were currently being maintained and enhanced and, in the context of a more efficient use of resources in universities, to explore the possibilities for maintaining and improving academic quality in the future.
- 1986** The report of the 'Reynolds Group', established by the Committee of Vice-Chancellors and Principals (CVCP) to study and report on institutions' methods for maintaining and monitoring academic quality and standards in response to the 1983 request by the Secretary of State, recommends points of reference for the self-assurance of the maintenance and monitoring of standards.
- 1988** The 1988 White Paper establishes the Polytechnics and Colleges Funding Council (PCFC) and the Universities Funding Council (UFC) who would no longer fund institutions through grants but rather would operate a system of contracting. Greater control could now be exerted over higher education institutions.
- 1990** The Academic Audit Unit (AAU), designed to provide a more permanent oversight of universities' standards and quality control, commences operations.

- 1992** The binary divide ends with 'public sector' institutions, under certain circumstances, able to adopt the title of 'university' and the PCFC and UFC being replaced by national funding councils.

Quality Assessment Councils are established within the funding councils and undertake assessments of the performance of subject areas within universities against their own declared aims and objectives.

The Higher Education Quality Council (HEQC) is founded and begins its quality audits where three peer auditors visit an institution to focus on four main areas: the provision and design of course and degree programmes, teaching and communication methods, academic staff, and means of taking account of external examiners' reports and the views of students and external bodies.

- 1994** The Secretary of State, John Patten MP, gives a speech at the HEFCE annual conference stressing the importance the Government placed upon the broad comparability of standards.

Assessment visits are extended to cover all institutions and departments and judgements of 'excellent', 'satisfactory' or 'unsatisfactory' are replaced by a score of 1 (the lowest) to 4 (the highest) for each of six core areas leading to a published overall profile of judgements containing a score out of 24.

The new Secretary of State, Mrs Gillian Shephard, asks the HEFCE Chief Executive, Professor (now Sir) Graeme Davies, to work with the representative bodies to determine how audit and assessment could be combined to form a single quality system.

- 1995** A Joint Planning Group is established by HEFCE and the CVCP to develop proposals for a single quality regime.

- 1996** The National Committee of Inquiry into Higher Education or the 'Dearing Committee' is established by the Secretary of State to 'make recommendations on how the purposes, shape, structure, size and funding of higher education, including support for students, should develop to meet the needs of the United Kingdom over the next 20 years'. This explores how to fund the continued expansion of the higher education system whilst maintaining or improving academic standards.

- 1997** The Quality Assurance Agency for Higher Education (QAA) is incorporated and takes over the HEQC's staff and functions. The new agency's board was made up of four members representing higher education institutions, four members representing the funding councils, and six independent members, demonstrating a shift away from pure self-regulation and towards a partnership between the state and the institutions.

The comprehensive Dearing report is published containing 93 executive recommendations. The report suggests the need for the standards of institutional awards to be maintained and recommended and that QAA should provide benchmarking information, create a 'National Qualifications Framework' and create a UK-wide pool of external examiners.

- 1998** QAA undertakes its first and second consultations and, following negotiations between the Department for Education and Employment (DfEE), HEFCE, representative bodies and QAA, an agreement resulting in a system more comprehensive than those it had replaced was reached for England.

The new approach entails 'Programme Reviews', resulting in threshold judgements concerning programme outcome standards and graded judgements

for a number of aspects of learning opportunities, and 'Institutional Reviews' resulting in an overall judgement of confidence in an institution's management of standards.

- 2000** QAA publishes the *Handbook for Academic Review* detailing its finalised methodology.
- 2001** LSE's Academic Board make a stand and threaten to withdraw from QAA over concerns about the new approach's infringement of academic freedom and the low standard of reviewers.
- The Secretary of State, David Blunkett, announces a 40% reduction in the volume of external review activity with departments that have scored highly in their last assessment becoming exempt from the next round.
- John Randall, Chief Executive of QAA, resigns.
- 2002** QAA publishes its *Handbook for Institutional Audit* detailing the revised, lighter touch approach following the Secretary of State's announcement the previous year.
- 2004** A fairly extensive set of information is made available on the Teaching Quality Information website, now Unistats.
- 2005** The first National Student Survey is run.
- 2009** A critical report by the House of Commons Innovation, Universities, Science and Skills Committee expresses concerns over low and declining academic standards in some areas of the UK higher education system and challenges QAA's existing practices stating that 'in not judging the standards themselves, the QAA is taking an unduly limited view of its potential role' (IUSSC, 2009, p.97). The committee recommends that QAA was to be reformed and re-established as a 'Quality and Standards Agency'.
- 2010** Parliament votes to raise the maximum tuition fees for undergraduate degrees provided by centrally-funded institutions to £9,000 per annum.
- 2011** The Institutional Audit methodology is replaced by the Institutional Review (England and Northern Ireland) seeing four areas now scrutinised by reviewers instead of two, the resulting judgements falling into four, not three, categories, students becoming full members of review teams, and there no longer being fixed programme of reviews but instead a more responsive rolling programme.

The Department for Business, Innovation and Skills (BIS) publishes the White Paper *Students at the Heart of the System* proposing a risk-based approach for QAA, focusing its effort where it will have greatest impact. New providers may receive a more regular and in-depth review whilst those providers with a demonstrable track record of high-quality provision can expect to see significantly less frequent or in-depth reviews.

## 8 References

- Better Regulation Task Force (2002). *Higher Education: Easing the Burden*, Cabinet Office: London.
- Brennan, J., Frederiks, M. and Shah, T. (1997). *Improving the Quality of Higher Education: The Impact of Quality Assessment on Institutions*, HEFCE, Jul.
- Brookman, J. (1992). HEQC Fires Fierce Broadside, *THES*, 18 Dec.

- Brown, R. and Carasso, H. (2013). *Everything for Sale? The Marketisation of UK Higher Education*. SRHE: London.
- Brown, R. (1997). *If At First You Don't Succeed ... Creating a Single System of External Quality Assurance in UK Higher Education*, inaugural lecture, Institute of Education.
- Brown, R. (2004). *Quality Assurance in Higher Education: The UK Experience since 1992*, RoutledgeFalmer: Oxon.
- Centre for Higher Education Studies (1994). *Assessment of Quality of Higher Education: A Review and an Evaluation*, Report for the Higher Education Funding Council for England and Wales, Institute of Education: London.
- Clark, P. (1994). *Quality Assessment: Present Position, Future Directions*, address to University of Newcastle upon Tyne.
- Committee of Vice-Chancellors and Principals (1986). *Academic Standards in Universities* (Jarratt Report), CVCP: London.
- Committee of Vice-Chancellors and Principals (1991). *CVCP Response to White Paper Higher Education: A New Framework (CM1541)*, Letter to DES, July.
- Committee of Vice-Chancellors and Principals (1992). *Annual Report of the Director 1990/91*, Academic Audit Unit, CVCP: London.
- Committee of Vice-Chancellors and Principals, Committee of Directors of Polytechnics, Standing Conference of Principals (1991). *Quality Assurance Arrangements for Higher Education*, letter to Kenneth Clark MP, 10 Oct.
- Department for Business, Innovation and Skills (2011). *Higher Education: Students at the Heart of the System*, Cmnd 8122, DBIS: London.
- Department for Education and Skills (1987). *Higher Education: Meeting the Challenge*, Cmnd 114, HMSO: London.
- Department for Education and Skills (1991). *Higher Education: A New Framework*, Cmnd 1541, HMSO: London.
- Departmental for Innovation, Universities and Skills (2009). Departmental Report, Cmnd 7596, July.
- Foster, H. (1993) Right Steps to Standards, *THES*, 1 Jan.
- Further and Higher Education Act, (1992). C.13. HMSO: London.
- Harrison, M., Lockwood, B., Miller, M., Oswald, A., Stewart, M. and Walker, I. (2001). Higher Education: Trial by Ordeal, *Guardian*, 30 Jan.
- Higher Education Funding Council for England (2012). *Invitation to the Quality Assurance Agency to Implement a more risk-based approach to the quality assurance of higher education in England*, letter to Anthony McClaran, Chief Executive of QAA, from Alan Langlands, Chief Executive of HEFCE, 6 Nov.
- Higher Education Quality Council (1996). *Strengthening External Examining*, HEQC: London.
- Higher Education Statistics Agency (2013). *General Student Numbers* [online]. Available at: [www.hesa.ac.uk/content/view/1897/239/](http://www.hesa.ac.uk/content/view/1897/239/)
- HL Deb 16 December 1991, vol 533, §1102-80.
- HL Deb 21 March 2001, vol 623, §1467-84.
- Innovation, Universities, Science and Skills Committee (2009). *Students and Universities: Eleventh Report of Session 2008-09*. HC 170-1. HMSO: London.
- Jenkins, S. (1995). 'The Lady who turned to nationalisation', *Times Higher Education Supplement*, 23 Oct [online]. Available at [www.timeshighereducation.co.uk/95716.article](http://www.timeshighereducation.co.uk/95716.article)
- Joint Planning Group (1996a). *First Report*, CVCP, Apr.
- Joint Planning Group (1996b). *Final Report*, CVCP, Dec.
- MacKinnon, I. and Norfolk, A. (2004). British university with branch in Israeli petrol station 'issued 5,500 bogus degrees', *The Times*, 22 Jan [online]. Available at [www.thetimes.co.uk/tto/education/article1802964.ece](http://www.thetimes.co.uk/tto/education/article1802964.ece)
- National Committee of Inquiry into Higher Education (1997). *Higher Education in the Learning Society*, HMSO: London.



- PA Consulting Group, (2000). *Better Accountability for Higher Education: Summary of a Review for the HEFCE by PA Consulting*, Report August 00/36.
- Quality Assurance Agency (1998a). An Agenda for Quality, *Higher Quality*, 3, Mar.
- Quality Assurance Agency (1998b). The Way Ahead, *Higher Quality*, 4, Oct.
- Quality Assurance Agency (2000). *Handbook for Academic Review*, QAA: Gloucester.
- Quality Assurance Agency (2002). *Handbook for Institutional Audit: England*, QAA: Gloucester.
- Quality Assurance Agency (2011). *Institutional Review of Higher Education Institutions in England and Northern Ireland: A Handbook for Higher Education Providers*, QAA: Gloucester.
- Randall, J. (2000). A Profession for the New Millennium? In: P. Scott, ed. (2000). *Higher Education Reformed*. Falmer Press: London.
- Shephard, G. (1994). Speech by the Secretary of State Rt Hon Gillian Shephard MP to the Committee of Vice-Chancellors and Principals, 2 Dec.
- Shephard, G. (1995). Developing Quality Assurance in Partnership with the Institutions of Higher Education, letter to Professor Gareth Roberts, Chair of CVCP, from Rt Hon Gillian Shephard MP, 21 Sep.
- Society for Research into Higher Education (1983). *The Leverhulme Report. Excellence in Diversity. Towards a New Strategy for Higher Education*. SRHE: Guildford.
- Stevens, R. (2005). *University to Uni: The Politics of Higher Education in England Since 1944*, Methuen Publishing Limited: London.
- Times Higher Education Supplement (1992). *Quality Assurance Arrangements are Going Wrong*, *THES*, 11 Dec.
- Times Higher Education Supplement (1993a). *Student Hardship Is Hitting Standards*, *THES*, 22 Jan.
- Times Higher Education Supplement (1993b). V-Cs Reject Quality Red Tape, *THES*, 22 Jan.
- Times Higher Education Supplement (1993c). V-Cs Slam Red Tape, *THES*, 15 Jan.
- Times Higher Education Supplement (1995). HEQC aims single agency salvo at Shephard, *THES*, 17 Jul [online]. Available at [www.timeshighereducation.co.uk/features/heqc-aims-single-agency-salvo-at-shephard/94546.article](http://www.timeshighereducation.co.uk/features/heqc-aims-single-agency-salvo-at-shephard/94546.article)
- Times Higher Education Supplement (2001). LSE Leads Revolt Against QAA, *THES*, 23 Mar [online]. Available at [www.timeshighereducation.co.uk/news/lse-leads-revolt-against-qaa/158362.article](http://www.timeshighereducation.co.uk/news/lse-leads-revolt-against-qaa/158362.article)
- Times Higher Education Supplement (2002). *Analysis: Salvaged ship sets sail out of the storm*, 8 Nov [online]. Available at [www.timeshighereducation.co.uk/news/analysis-salvaged-ship-sets-sail-out-of-the-storm/172819.article](http://www.timeshighereducation.co.uk/news/analysis-salvaged-ship-sets-sail-out-of-the-storm/172819.article)
- Times Higher Education Supplement (2005a). *QAA tells Leeds Met to close loophole*, 6 May [online]. Available at: [www.timeshighereducation.co.uk/news/qaa-tells-leeds-met-to-close-loophole/195831.article](http://www.timeshighereducation.co.uk/news/qaa-tells-leeds-met-to-close-loophole/195831.article)
- Times Higher Education Supplement (2005b). *De Montfort in exam furore*, 18 Mar [online]. Available at: [www.timeshighereducation.co.uk/news/de-montfort-in-exam-furore/194764.article](http://www.timeshighereducation.co.uk/news/de-montfort-in-exam-furore/194764.article)
- Times Higher Education Supplement (2005c). *Luton Waived Entry Criteria*, 14 Jan [online]. Available at: [www.timeshighereducation.co.uk/news/luton-waived-entry-criteria/193410.article](http://www.timeshighereducation.co.uk/news/luton-waived-entry-criteria/193410.article)
- Wagner, L. (1993). The Teaching Quality Debate, *Higher Education Quarterly*, 47(3), pp.274-85.
- Walden, G. (1996). *We Should Know Better: Solving the Education Crisis*, London: Fourth Estate.
- Watson, D. (1995). Quality Assessment and 'Self-Regulation': The English Experience, 1992-94, *Higher Education Quarterly*, 49(4), pp.326-40.
- Watson, D. and Bowden, R. (1997). *Ends without means The Conservative Stewardship of UK Higher Education 1979-1997*, Brighton University.
- Wolf, A. (1998). Two Sides of A4 Will Not Do the Trick, *Times Higher Education Supplement*, 22 May.

© The Quality Assurance Agency for Higher Education 2014  
Southgate House, Southgate Street, Gloucester GL1 1UB  
Registered charity numbers 1062746 and SC037786