UNIVERSITY OF GREENWICH

SEDA Legacy Research Project: Final Report

Higher education policy and the shaping of educational development practice

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Educational developers are key interpreters of higher education policy, yet little research to date has focussed on the connection between policy and educational development practice. This project provides a systematic, multi-dimensional and critical analysis aimed at showing how policy messages are communicated and played out within educational development. This study employs methods from critical discourse analysis (CDA) to analyse a major UK policy relating to learning and teaching, the Learning and Teaching Chapter from the Quality Assurance Agency's (QAA) Quality Code. The analysis focuses on three dimensions: the structure, organisation and choice of words in the policy text itself; the way in which it was developed and how it is interpreted; and the socio-cultural conditions that govern the process of the policy's production, reception and implementation. The combination of the textual analysis of existing policy documentation and the interpretation of in-depth interview data collected from policy developers and policy users paints a rich picture of policy in context and its constitutive power. The findings focus specifically on the development of the Chapter, the content and structure of the Chapter and educational developers' reactions to it; and the implementation of the challenges that it will pose. The research throws light on the depiction of educational development work within national policy and reveals how developers respond to, work with, shape and, in turn, are themselves shaped by policy.

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Background to the study

The rise of quality assurance in the UK

Since the 1990s, issues of quality have been one of the foremost concerns of UK higher education (Harvey 2005) and current contemporary higher education institutions are engaged in a panoply of internal and external quality assurance processes and procedures. Internal quality assurance includes periodic reviews, course approvals, student assessment, monitoring, and evaluations. External quality assurance includes accreditation by professional bodies, student surveys (e.g. NSS), and adherence to the Quality Assurance Agency's (QAA) recent Quality Code, which includes the Framework for Higher Education Qualifications and Subject Benchmark Statements (see: http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code).

The quality landscape was not always so complex; the impetus for the increased attention to quality matters has been put down to the changing nature of higher education: globalisation, widening participation, new technologies and decreasing resource all contributed to concerns about the maintenance of educational quality (McKimm 2009). The public needed reassurance that these changes were not going to impact detrimentally on academic standards and that the public funds that they contributed through their taxes were being used effectively (Hodson & Thomas 2003). The introduction of tuition fees from 1998 onwards also led students to be more demanding of the education that they are receiving (Lomas 2007).

In order to better understand how to respond to this changed environment, in 1997 the UK government commissioned the largest review of higher education since the Robbins Report in the 1960s. The findings from the reviews, published as the Dearing Report (National Committee of Inquiry into Higher Education 1997) had amongst their recommendations the establishment of a national quality assurance framework. The QAA was formed and tasked to create and maintain this new framework for the assurance of quality and standards (Jackson 2000).

The QAA was established as the single external quality assurance agency for the UK. Since its inception, the QAA has sought to safeguard academic standards and support the improvement of quality for students (QAA website). While their review work is contracted by the UK's funding councils, the QAA works independently of them and of government and higher education institutions. Over the years, the QAA has developed its approaches to quality assurance. The current approach combines the Higher Education Reviews it carries out in England, Wales and Northern Ireland and the Enhancement-Led Institutional Review (ELIR) in Scotland with guidance on how to meet sector-endorsed expectations of quality and standards, through the Quality Code. This policy

plays a pivotal role in the assurance of quality in the UK as it is the key reference document used in all QAA review activity (QAA website).

The resulting Quality Code has been developed in an openly consultative manner, and is therefore sector-endorsed. It also places more emphasis on quality enhancement and continual improvement to complement the assurance of academic quality and standards; an approach that has been championed by educational researchers (see, for example: Harvey & Newton 2007; Singh 2010; Saunders 2014) The changes in the development and focus of the Quality Code might well be a response to the criticism and the challenges that the QAA has faced over recent years.

Academic perceptions of the QAA and quality processes more generally

Since its inception, the QAA has received criticism for its focus on accountability and compliance and the associated erosion of both autonomy and academic freedom (Harvey 2005). In general, the sector has resented what it perceives to be the QAA's desire to control their practices (Harvey 2005). Others have criticised the QAA's focus on quality assurance at the expense of quality enhancement (Lomas 2007; Singh 2010) which result in quality processes have little impact on the student experience (Harvey 2005). Academics have also, through the specialised press, questioned the QAA's fitness for purpose, the value of their judgements, and their influence in the face of powerful institutions (see, for example, Macleod 2001; Arnot 2008; Brown & Alderman 2008; BBC 2010; Gove 2013). Finally, the White Paper *Students at the Heart the System* (BIS 2011) called for greater scrutiny of the way in which universities were reviewed, and therefore quality assured (Jackson 2013).

In general, academics in UK universities have had an uncomfortable relationship not only with the QAA, but with the concept of quality more generally. They see it as an intrusion, an industry and a burden (Newton 2000) and irrelevant (Cartwright 2007). Rather than improving student learning, quality assurance disconnects policy from practice (Anderson 2006), creates a false divide between quality assurance, and enhancement and limits opportunities for innovation (Lomas 2007). For those who engage, their collaboration is often reluctant (Cartwright 2007)and quality activity is symbolic or actively subverted (Cheng 2011; Cartwright 2007; Clegg & Smith 2010).

The term 'quality', then, carries with it substantial baggage that anyone working within the area needs to recognise and deal with (Hodgson & Whalley 2006). This is especially the case for educational developers who are increasingly working on the often blurred boundary between quality enhancement and quality assurance, or in the liminal space that Gosling and D'Andrea (2001) call 'quality development', where developers engage in quality-assurance led educational development.

The adoption of such roles provides evidence for the changing nature of educational development, as it becomes increasingly strategic.

The role of educational developers

Educational development is still a developing field (Debowski 2014; Amundsen & Wilson 2012); however, during its relatively short existence, the role and nature of educational development has changed quite substantially (Gibbs 2013).

Initially, educational development aligned itself with students, its aim being to enhance the student experience through its work with academic staff (Clegg 2009). With time, educational development has shifted away from work with people to more strategic change management (Clegg 2009) and, as Gosling's (2009)most recent review of educational development centres in the UK shows, educational development has become 'more securely embedded in senior management' (Gosling 2009,p.9) than ever before. This shift in educational development practice is, in part, a response to the same drivers that influenced change in the processes and procedures connected with quality assurance discussed above. The changing higher education landscape that impacted on educational development work is defined by Land (2004, pp.3-11) as including the following conditions: massification; mangerialism; accountability; learning technology; marketization and consumerism; and pedagogic and epistemic change. Of particular interest in relation to this project is the impact of 'accountability' on educational developer practice. As Land notes: 'the increasing requirement for institutions to engage in procedures for assuring the quality of education' has been a major driver for the work of educational developers and has proved an opportunity for developers to exert influence at both the institutional and individual level (Land 2004,p.6). As educational development work has become increasingly strategic, developers have found themselves authoring, contributing and responding to institutional and national policy priorities (Gosling 2009; Handal et al. 2014; Roxå & Mårtensson 2008; Trowler 2004).

It is clear that the changing higher education environment has opened up opportunities for the development of educational developer practice and the broadening of the scope and influence of that practice. Educational development roles can incorporate some or any of the following, taken from Debowski (2011,p.18): 'academic skills and capability enhancement in the areas of teaching and learning and, in some cases, research and leadership; curriculum reform and development; student support services; student management; learning technologies; educational evaluation and management; educational research and scholarship; policy and organisation practice; and university change and system enhancement'. This can be empowering. Equally, the 'blurring of boundaries' of educational development work can be source of anxiety and tension (Land 2004,p.3). This is

particularly acute in the area of quality assurance, while engagement in quality assurance and quality enhancement agendas undoubtedly offers educational developers opportunities (Gordon 2011, p.38), 'a blurring of notions of quality enhancement with quality assurance, also complicates the operational practice of developers, merging the monitoring of standards with the development of good practice' (Land 2004,p.6); in this location, the focus can be too much on policing quality than on enhancing, a stance many educational developers are still not comfortable to take (Land 2004,p.7).

In general, the positioning of educational development remains problematic, particularly in an age of strategic alignment (Steffani 2011). This focus on matters of strategy has resulted in educational developers often 'positioned precariously between senior management and academic staff' (Clegg 2009,p.408). Strategic educational developers have to 'act as mediator between institutional policy makers and teaching departments'(Gosling 2009,p.11) and have become 'acceptable interpreters and framers working with both senior management and frontline academics' (Steffani 2011,p.3). Such an 'unhomely' positioning between learners and teachers, academics and managers, and teaching and research (Manathunga 2007) is uncomfortable and can be a source of real personal tension. Educational developers can find their values at odds with the institutional requirements they are tasked to meet (Gosling 2009; Knight & Wilcox 1998; Handal et al. 2014). Educational developers are also 'academic migrants', who have often moved into educational development from other disciplines (Green & Little 2013)and struggle for credibility and legitimacy amongst their discipline-based academic colleagues (Clegg 2009). These 'unhomely' (Manathunga 2007), 'marginal' (Green & Little 2013), and 'unsettled' (Grant 2007) educational developer identities need not always be seen negatively, as these authors show. This positioning can equally be a source of power as it provides opportunities for educational developers to shape learning and teaching practice and at the same time strengthen, develop and focus the scope and nature of their role. This project seeks to explore how educational development shapes and is shaped by educational developers' engagement with learning and teaching policy.

Project Overview

This project outlined here provides a systematic, multi-level and critical analysis of the workings of educational developers in relation to a key UK policy document relating to learning and teaching. According to Ball, 'policies are pre-eminently, statements about practice – the way things could or should be' (Ball 1990, p.22).They are defined as plans or courses of action, set out by a government, institution, group or an individual, to establish present or future directions (Merriam-Webster no date). While the definition of policy is important, understanding what a policy means is not so

simple. Policy can carry many meanings; it is open to interpretation. The project sought to explore how one stakeholder group, the educational development community, interpreted and enacted one policy.

Through critical discourse analysis (CDA), this project explores how policy messages are communicated and played out in educational development practice through a three-dimensional analysis of: the policy text; how it was developed and is interpreted; and its socio-cultural context. The research is unique in its use of CDA to explore educational developers' response to and engagement with higher education policy. It adds to burgeoning research into higher education policy using methods from CDA (for an overview see: Smith 2013) and extends critical research around the work practices and identity formation of educational developers (Bath & Smith 2004; Lee 2008; Manathunga 2007). It therefore offers a comprehensive analysis of a policy that will impact on the work of all educational developers within the UK. It throws light on the depiction of educational development work within national policy, reveals how learning and teaching policy is developed, and shows how educational development shapes and is shaped by policy. These findings will be of benefit to future educational developers as they work within an increasingly strategic and policy-driven higher education sector.

The next section sets out in more detail the research methodology adopted in this study.

Approach to the Study

The study draws on the Quality Assurance Agency's (QAA) new Quality Code (henceforth 'the Code'). Chapter B:3 Learning and Teaching (henceforth 'the Chapter'), within the Assuring and Enhancing Academic Standards section, will be the particular focus.

The QAA define the Quality Code as:

> The nationally agreed, definitive point of reference for all those involved in delivery higher education programmes which lead to an award from, or are validated by, a UK higher education awarding body (QAA, 3, p.1).

The Quality Code comprehensively sets out the expectations for quality that all higher education providers are required to meet and forms a key role in the UK's quality assurance mechanism for higher education. While the Code is not mandatory, it does provide Indicators of Sound Practice that education providers can use to develop 'regulations, procedures and practices' (the Chapter, p.1). The QAA reviews institutions to check that they are meeting the expectations of the sector. As well as providing guidelines for the future of higher education provision, the Code also has the potential

to shape educational development work, through educational developers' interpretation and their subsequent implementation of the policy messages that it carries.

This study used critical discourse analysis (CDA) for the analysis of the policy text, policy documentation and stakeholder interviews. CDA is a powerful approach to the study of language that seeks to unearth taken-for-granted assumptions and reveal the ideological goals behind text and talk. The project will draw specifically on Fairclough's dimensions of discourse and discourse analysis (2010), see figure 1.
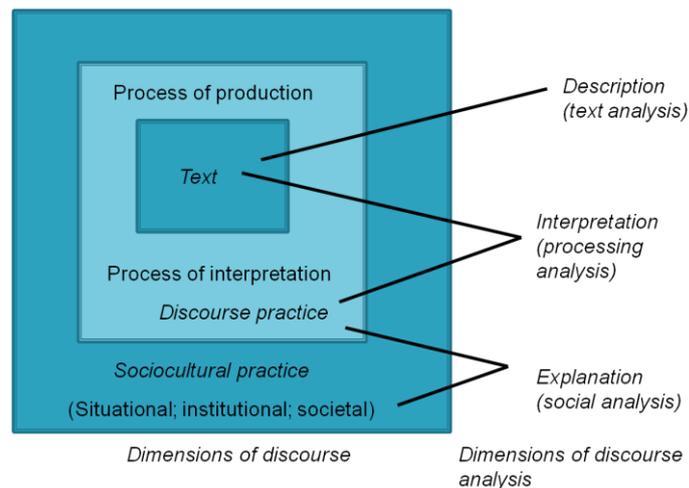
Figure 1: Dimensions of discourse and discourse analysis

There are three dimensions of discourse: text, discourse practice, and socio-cultural practice – each requiring a different approach to analysis. Initially, the text of the Code was analysed using techniques from textual analysis, principally looking at the roles and responsibilities of the actors identified within the Code. Such a systematic and detailed textual analysis offers an in-depth reading of a text and moves beyond simple textual commentary (Fairclough 2010, p.10), highlighting implied messages that rest in the structure, organisation and choice of words in a text.

What textual analysis alone cannot do is to shed light on the meanings intended by the authors of the policy text, nor the ways in which the policy will be decoded by the text receivers (Smith 2008). Therefore, a second phase of the research focussed on processing analysis, exploring the means by which the Code was produced (through analysis of documents relating to the writing of the Code, and interviews with members of the document's Advisory Group) and how the Code is interpreted by the text receivers, in this case educational developers (captured through in-depth, semi-structured interviews). Thematic analysis (Fereday & Muir-Cochrane 2006) was used to identify the key themes in these data.

In the presentation of findings and in the concluding comments, the impact of context will be discussed. Any text is embedded within a socio-cultural context. This can happen at a number of levels: 'in the immediate situation, in the wider institution or organisation, and at a societal level' (Fairclough 2010, p.132). The analysis will situate the policy text (here the Chapter), and its development and interpretation, within the wider social context.

Ethical considerations

Given part of the data is drawn from human subjects, ethical issues had to be considered. The most pressing ethical concern is that of anonymity. The research draws a relatively small sample of interviewees, particularly those selected from the Advisory Group. It is imperative that these interviewees' remain anonymous. Any identifying features from the interviewees' accounts have been removed and personal details are held separate from audio transcripts. Copies of written outputs were given to participants on request, and any amendments made. All raw data was stored within password protected files. These ethical concerns were set out within the approval documentation submitted to the University of Greenwich's Research Ethics' Committee in April 2013. The ethical approval request was granted with no changes or recommendations made.

Data collection

Textual data

As noted above, the main source of textual data is the Chapter from the Code. The Chapter was chosen because its focus on learning and teaching means it aligns closely with the remit of much educational development work (Debowski 2011b; Gosling 2009). The Chapter runs to twenty-seven pages, totalling 8,880 words and 1,647 individual word forms. The text of the Chapter was analysed with the aid of TextSTAT, a programme designed to facilitate the quantitative analysis of textual data. Frequency lists were produced and these were used to select key words for further analysis (Baker 2006). Analysis also focussed on the roles and responsibilities of the higher education providers, staff, students and educational developers.

Documents were also used to explore the process of production. Five documents were retrieved from the QAA's website, which dealt with the development process for either the Chapter or the Code more generally. The data were used to verify, expand, and to contrast with the accounts of the development process provided during the interviews, which were the other main data collection source.

Interview data

Ten interviews were carried with members of the educational development community. The interviewees were selected through the purposive sampling of my own existing personal networks of educational developers, and through recommendations from colleagues (snowball sampling). The sample was designed to reflect the diversity of the educational development community.

The sample included three men and seven women. Seven of the interviewees worked within post-1992 institutions, one in a pre-1992 university and two in Russell Group universities. They had different work remits and levels of seniority. Their jobs titles included development coordinators, development advisors, lecturers in educational development, a head of academic practice, a deputy head of an educational development unit, and a senior manager with a remit for learning and teaching. Five interviewees were located in the south of England, two in the north, one in central England and two in Scotland.

The interviews were all conducted face-to-face and used the semi-structured interview schedule as a prompt for discussion. The interviews ranged in length from 47minutes to 1hour 20minutes and resulted in 10hours and 5minutes of recorded data or 85,401 transcribed words.

A further five interviewees were with members of the Chapter's Advisory Group. They were randomly selected from the published list of twenty-three group members at the end of the Chapter. Four interviews were carried out face-to-face. The final interview was conducted using Skype and was recorded using MP3 Skype recorder software. Again, a semi-structured interview schedule was used to prompt discussion. The interviews ranged in length from 48minutes to 1hour and 8minutes and resulted in a further 4hours and 36minutes of recorded interviews or 43,875 transcribed words.

These 14hours 40minutes of interviews were outsourced for transcription. The data collection has provided a rich dataset for analysis along with the Chapter itself and the QAA-produced documentation on the Code's development process.

Presentation of data

In the presentation of the textual data, the Chapter is referred to as 'the Chapter', with appropriate page numbers provided. The other documents are referred to thus:

- QAA 1, which is the 'Consultation event feedback report'
- QAA 2, which is the 'Protocol for revisions to the UK Quality Code for Higher Education February 2012'

- QAA 3, which is the 'Protocol for developing the UK Quality Code for Higher Education February 2012'
- QAA 4, which is the 'UK Quality Code for Higher Education, Chapter B3, Learning and Teaching – Consultation events'
- QAA 5, which is the 'Changes to the Academic Infrastructure: final report'

Full reference to all these texts can be found at the beginning of the reference section.

In the presentation of the empirical data below, each educational developer interviewee has been given a number between one and ten. The advisory group interviewees, however, remain unnumbered in an attempt to maintain anonymity.

Findings

The findings have been presented under three main themes. These are the development of the Chapter; the content and structure of the Chapter and educational developer responses to it; and the implementation of the Chapter and the challenges it poses. These are introduced and discussed below.

The development of the Chapter

The birth of the Quality Code

Back in 1997, the Dearing Report (1997) advised that the UK should develop a quality agenda to assure the quality of UK higher education and the QAA was contracted by the UK's funding councils to audit and assess higher education quality. This was initially done through the Academic Infrastructure, which was 'a series of guidance documents (points of reference) published by QAA. It is used by institutions to ensure that their courses meet national expectations for academic standards, and that students have access to a suitable environment for learning (academic quality)' (QAA 5, p.3). After over a decade of use, a comprehensive evaluation was carried out in 2009-2012 into the Academic Infrastructure:

> The QAA decided we needed to look at whether the Academic Infrastructure was still working for the sector and whether it was doing what it set out to do and whether it was still useful.

It was decided that the Academic Infrastructure should be restructured to reflect the changing nature of higher education, while retaining its 'core purpose' (QAA 5, p.3). The result was the Quality Code for UK Higher Education (the Code).

The restructuring allowed the QAA to identify gaps in the previous Academic Infrastructure's provision. One such gap was specific guidance on learning and teaching:

> The Academic Infrastructure talked about specific forms of learning, so work-based learning, flexible learning, but didn't talk about learning and teaching in a broad, broad sense […] so that's why we identified the new chapter on learning and teaching.

The restructuring also allowed the QAA to rectify some of the criticisms that they had been facing, as an Advisory Group member outlined:

> The QAA processes, the audit processes and things are not really getting to the core of the issues and they're not assuring quality. So the revamp, I would see the revamp of the Quality Code, as being in part response to that because it extends to other areas that were not there before

This is also alluded to in the QAA's document outlining the rationale for developing a new Quality Code, where they state:

> Students and the wider public need to expect reassurance that academic standards and quality are comparable across all UK higher education providers. They need to know that quality and standards are maintained, and to feel confident that these are objectively and independently verified in ways that take account of current developments. The revised and strengthened Quality Code will address these concerns in clear terms (QAA 5, p.3).

The scene was set for a new Code and also a new chapter on learning and teaching. The development of the Chapter was factored into the development schedule. The Chapter would be one of the first elements of the Code to be developed, along with chapter on External Examining, student engagement, and postgraduate research programmes. These chapters were chosen specifically because: 'these are all topics on which there is currently a focus within higher education, and which have clear implications for the quality of education experience by students (QAA 5,p.4). Development of the Chapter, like other chapters within the Code, followed a prescribed protocol (QAA 3) which is discussed below.

Background to development

While other chapters in the Code could draw heavily on previous chapters, B3: Learning and Teaching was essentially a brand new chapter: 'the Chapter is new ground for us. There's not been anything on learning and teaching before'.

It was not, however, a case of completely starting from scratch. It did incorporate aspects of the *Code of practice for the assurance of academic quality and standards in higher education (Code of practice), Section 2: Collaborative provision and flexible and distributed learning (including e-*

learning); the Code of practice, Section 9: Work-based and placement learning; and *Code of practice, Section 3: Disabled students.* The Chapter could also draw on other chapters in the Code (e.g. B1, B4, and B6), personal development planning guidelines, the HEA's UK Professional Standards Framework and HEA resources (QAA 5, pp.28-29).

Development of the Chapter took place in 2012, with Consultation events in June and July 2012 and the final version published by the QAA in September 2012. The development process, therefore, was quick (around six months), and for some it felt too quick: 'it was very swift. In fact it seemed impossible' and resulted in very intense periods of work.

The approach to development was not new; it was based on a tried and tested method used previously by the QAA. This is set out on the *Protocol for Developing the UK Quality Code for Higher Education* (QAA, 3) and discussed by Advisory Group members:

> It was a process that was developed by the QAA. It wasn't a process that we [the Advisory Group] developed. And they developed it based on their experience with other chapters. I felt as if it was a good process.

> The actual process that we followed is the same as we follow for all the chapters in the Quality Code, which is very heavily based on what we did previously when we were developing and revising the Academic Infrastructure.

The Code has a Steering Group, which is responsible for ensuring that 'the protocol is followed and for overall insight and coordination for the development of the Quality Code' (QAA 3, p.1). The development of individual chapters is coordinated by the QAA officers who are attached to each chapter.

The Role of the QAA and the Specialist Writer

The QAA team involved in the development of the Code is small and they work closely together. During internal meetings, staff members decided which two members of QAA should work on each Chapter. The QAA staff members were: 'responsible for managing the project and seeing it through the completion to agreed deadlines'. They were also there to:

> Keep reminding people that this is an expectation; it is the thing that higher education providers will be judged about, upon, when it comes to review. And therefore it's really important that we get something that actually is workable and can be translated into institutional practice, while saying at the same time, the kinds of thing that we want to say from the learning and teaching perspective.

The QAA staff employed the Specialist Writer, whose job it was to 'craft' the chapter. He had worked on another chapter in the Code and was able to bring 'a sense of what the chapter had been trying to convey'. The Specialist Writer's role was described in the following way:

> [He] is sort of a member of the group and has expertise in the area but we actually paid him to put together the drafts

> The Specialist Writer was involved throughout the process, producing drafts, working with the Advisory Group and going to the consultation events, discussing there about the issues that were being raised through that process. So, you know, the iterative way was very much informed by the various discussions to help us get to the point.

The Specialist Writer was an integral part of the development process:

> I would certainly say my view's been for the new chapters that we have started from scratch that having that specialist writer do that has been an absolute godsend; because it's really difficult when you've got this sort of three hour discussion that you've got to make into something.

> You can't write by committee. It just, it doesn't work. So you've got to have that clear responsibility [the Specialist Writer]. But with the opportunity to make changes, which does seem to work, and it's worked and served us well.

It was also the QAA staff who were responsible for drawing together the Advisory Group, who would support the development of the Chapter.

Advisory Group

The Code development protocol sets out how the composition of the Group and how members should be recruited:

> This advisory group will be made up of practitioners and students who are experts on the topic of the Chapter. The advisory group will always include at least one student representative and/or an officer of the National Union of Students. It will include one practitioner who, as well as being an expert on the topic of the Chapter, has experience and knowledge of equality and diversity issues, and one practitioner or other representative with expertise in European and international developments in higher education.

> Higher education providers and other sector representative bodies will be invited to nominate experts on the topics of the Chapter/parts of the Quality Code, from whom members of advisory groups may be drawn. However, QAA reserves the right the approach individuals directly in order to ensure any single advisory groups has the right balance of expertise (QAA 3, p.1).

Advisory Group members set out how this worked in practice:

We sat down and talked about who we needed to have in an Advisory Group to make it representative. Both of the sector as a whole, so that's different types of institution, different countries, different types of institution meaning both sort of university and college, but also research in terms of teaching, sort of both spectrums and then just also sort of represent the area that learning and teaching covers.

This selection process was important as the Advisory Group was key to the successful development of the Chapter:

I think also the Advisory Group certainly was a strength, because obviously they were a diverse group of people.

In terms of the Advisory Group, they were very enthusiastic participating and they were very generous with their expertise […] we couldn't do it without them […] they are extremely helpful in their feedback and it is what gives us, because although the team in the QAA have a variety of backgrounds and a variety of areas of specialist knowledge, we don't have anything like enough expertise to be able to write something, so they are valuable in what we do and I think that's something, possibly, that sometimes people just generally out in the sector don't necessarily always understand. They think it's the QAA writing this and telling us what to do. It's not.

The final Advisory Group comprised twenty-three people. Two were QAA employees and one contracted by the QAA as the Specialist Writer. The QAA staff members had both worked on other chapters of the Code and were familiar with their content and format and could advise on consistency.

The remaining members were selected due to their expertise within the area of learning and teaching within higher education and also their representativeness of the higher education sector as a whole. Initially it was hoped to also reflect disciplinary differences, but it was recognised that this was unfeasible; the resulting group, which did represent different subject areas, was a result of chance rather than design:

The fact that we had representatives around the room from, who represented a variety of different learning settings, was really helpful.

The interviewees felt that they had been selected because of their expertise in particular areas, through their work for the QAA (e.g. as a reviewer), or due to exposure to the QAA through conferences.

> I was invited to be part of the group for, I'm not exactly sure what the reasons are, but in part because of my role, which is a substantial teaching and learning role, but I suspect also in part because I am a QAA reviewer.

> I was contacted directly by the QAA and I assume that was because they wanted to have my area of expertise represented.

All recognised that the Group was committed, enthusiastic about learning and teaching, and that they adopted a very collegial approach to the development process.

> I mean, I will say it was a very good group and there were clearly some, you know, I didn't get to know everybody but there were people on there who clearly had extensive experience from their own, you know, their own backgrounds [...] It certainly wasn't likeminded people, although everybody felt really strongly about developing teaching and learning.

> We really wrestled with things and people spoke passionately. It was clear that people very much cared about these issues.

> There was mutual respect in these meetings. I was very impressed with it.

Advisory Group members supported the development of the Chapter through their involvement in meetings, email discussions, and public consultation events.

Development Process

Overview

The Advisory Group met three times face-to-face to work on the development of the Chapter. These meetings were supplemented by 'rich' email discussions, where Group members could comment on drafts:

> There was a lot of email conversation, a lot of drafts, a lot of ideas constantly being circulated throughout the members of the Advisory Group. The face-to-face meetings were very useful, quite full on in some instances, but there was a lot of I'd say, a lot of rich discussion that occurred outside of the Advisory Group via email.

The Specialist Writer worked closely with the QAA and other members of the Advisory Group throughout the development process. He was also responsive to the group members' comments to such an extent that the interviewees stated that the resulting Chapter did reflect their development meeting discussions well and also represented the key issues facing UK higher education:

> I felt not only did it represent the views and concerns of the Advisory Group and represented something none of us could have done alone, I think it represented, it captured the concerns of the

sector, that came out of the consultation. I was really impressed actually, that as painful as it felt at the time, that the process worked.

What follows is a more detailed overview of the component parts of the development process, and the Advisory Group's involvement.

First meeting

The first meeting was essentially designed to enable the Group members to get to know each other better and understand the process and purpose of the Chapter, its development and what it should cover:

> The first meeting is about two things. What it's about and the group getting to know each other and the different perspectives they're bringing

> The first meeting was really a sort of scoping meeting from which there was a sort of list of the working indicators and the working expectations.

The first session also set out the parameters of the Chapter and an overview of its general structure. Prior to this meeting, the overall structure of the Chapter along with an indicative Expectation had already been formulated (QAA 5, pp.28-29). Some Advisory Group members found this structure prescriptive:

> We were given some pretty strict parameters to start with and that felt, I think, confining to many of us. So when we started they told us there were certain bits of the text that needed to be part of every chapter […] the structure was given to us, so the structure of having an Expectation at the beginning, and then the Indicators.

Among these parameters were the boundaries of the Chapter, that is what was to be included and what was not. These boundary decisions led to some rich discussions around what one interview called 'border lands'. The most hotly debated boundary, which had been decided before the development process began, was the decision to split assessment from learning and teaching:

> The biggest debate we had had around learning and teaching was around whether it should include assessment and that was quite a big debate, that was the Advisory Group actually, probably at the first meeting, challenged us quite hard. Yes, you could have a single Chapter which deals with learning, teaching and assessment. The reason we didn't was that we already had a well-defined document that dealt with assessment. If we're going to have a chapter structure which is what we think the sector wants in terms of it being manageable, you've got to draw the line somewhere.

> It's very difficult to separate learning, teaching and assessment. I think not to look at assessment in the design of learning and teaching is a failure […] But actually the work we're doing now on the

assessment chapter, we couldn't have done that as part of the learning and teaching chapter, it would have been hell. I think it's right that we have done it the way we've done it, but I think we are making good steps to tie the two things together as best we can.

There were also some discussion on the role of assessment in learning and teaching because there's a chapter on assessment. So we had ended up over the course of the project doing a bit of negotiation about what's in for us and what's out for us and what we kind of focussed on is to say, alright, well assessment, formative assessment is part of teaching. And so we have to include some aspects of formative assessment in this chapter. But what we won't deal with is lots of stuff to do with guidelines and summative assessment.

Another area of discussion was around the integration of both inclusive practice and technology within the Chapter rather than within distinct and separate chapters:

It was really obvious to everyone, I think, quite early on, that this Chapter on e-learning just needed to be, we needed to treat, treat this Chapter, have this Chapter reading all kinds of teaching and learning situations, whether it's e-learning, or lab-based learning, or internships, work-based learning. There was a whole variety of settings in which teaching and learning takes place and we needed a Chapter that covered all.

To what extent should you be talking about technology and the use of technology? Well it's pervasive. So perhaps you don't need to highlight technology in the same you might have done if you were developing a similar code say ten years ago.

I mean, all types of students, that was interesting because we'd made the decision on the back of the findings of the new evaluation that we weren't going to have a separate chapter on disabled students anymore, that we needed to embed that, but also broaden out, so it wasn't just disabled students, it was students with all kinds of needs. This was probably the first chapter we tackled where we really had to get to grips with that and deal with that.

While the rationale for this integration was there, one developer at least felt that this approach rather diluted the message:

I think that one of the things this document says it does is it bring together disabled students and inclusive practice and the technology enhanced learning aspect, and I think it's wise to do, but I think that what happened is that they also got lost [...] Sometimes drawing attention to it helps to make sure it's done. So I think I felt like that had been lost slightly in this document (9)

Boundary discussions aside, the first session activity involved the members working in small groups to prioritise the issues that contemporary UK higher education faces.

We were split into groups. The groups had some discussions about what would be in and try and prioritise those and then from those, they sort of took the top three from year group and then brought those together into, originally it was I think, 11 or 12 indicators and those 11, 12 indicators as they went through the process, I think, became 10 for the consultation and that ended up as 9.

We did a post-it note exercise; we got them to give us ideas of what we ought to include in the Chapter.

We had a group discussion to sort of explain the context and trying to pick up some of the big issues and then we broke into three groups. The brief was 'what are the key themes?' I think it was around what would you like to see as the indicators within the text.

These issues were then used to roughly draft the Chapter's Expectation and Indicators. This was the responsibility of the Specialist Writer.

Second meeting

In the period between the first two meetings, the Writer used the Expectation and Indicators to formulate a full draft. This draft was the focus of the second meeting.

We had a rough something, a very rough something to look at when we came back [to the second meeting]

Then by the second meeting, we were at a stage where we got something getting close to a draft consultation and people would then debate whether we'd got what we wanted to say.

The second meeting of the group is then looking at a draft and sort of pulling that apart and putting it back together.

The interviewees noted that a lot of time was spent ensuring that the language of the Expectation and Indicators was appropriate:

We spent a lot of time at the beginning looking at this Expectation. I found […] it frustrating how much time we spent working on the Expectation […] because we really spent a lot of time in a way that only a committee can.

This focus on the Expectation and the Indicator continued throughout the process. One group member, reflecting back, wonders whether this was at detriment to the rest of the document:

We've talked the Expectation and the Indicators. The other bits, I think, from my perspective, are more problematic, because the other bits are sort of contextual material which came from a variety of different sources, and I think if you, certainly when I was reading through the final versions, I would just say, if I'm looking at that now as a critical document, it's not balanced. I mean I'm broadly

comfortable with the Expectation and the Indicators. You'll always want to argue about a bit of language here and there, but contextual material that comes in between I think could have done with more work

These concerns aside, this draft was then signed off by the QAA and sent out for formal consultation:

That [the draft] then goes through the QAA's internal processes, just the proofreading and the sign off before we have the consultation.

Consultation and Formal Feedback

The QAA hosted four consultation events as part of the development process in the four countries of the UK:

The consultation we promote to all higher education providers, so that's universities and colleges in the UK and to all sorts of sector bodies, specifically ones related to the topic. So it was bodies like the SEDA, and the learning and development communities and things. Anybody is welcome to contribute to the consultation, either as an individual or as an organisation.

Advisory Group members were invited to attend the consultations and most went to at least one. The events were well attended, attracting 215 participants. 73% (n=158) of attendees came from higher education institutions, 18% (n=39) from further education providers, with smaller numbers from private providers, funding bodies and Government agencies, PSRBs and student bodies (QAA 1, p.2). Attendees were primarily those with a quality assurance remit within their institution (Advisory Group interview).

These consultation events were seen as a means to share, with a larger group of stakeholders, the approach to development as well as to gain feedback on the draft:

They're very much discussion events, so we talk about the process and development and what we think the key themes are, or key challenges are.

People could come along, people within HE providers, could come along and have more detailed insight into the thinking behind the Chapter and talk about the details, particularly the wording of the expectation. We very much badged the events on the basis that they were there not to actually take responses, per say, but to help people engage with the Chapter and understand why we, and how we got to the point where we got to

The events aimed to be informative and feedback suggests that they were; 99% of respondents felt better informed about the Chapter having attended the event. This was reinforced by free-text comments: 'really useful discussion has improved my understanding and importance of the Quality Code' (QAA 1, p.9).

QAA staff, the Writer and the Advisory Group members opened the events with a presentation on the Chapter, which the 93% of attendees found useful (QAA 1, p.3), as this attendee notes: 'useful to have members of the Advisory Group present to discuss intentions of the draft' (QAA 1, p.11).

The consultation attendees worked in small groups to annotate the Expectation and the Indicators:

> We had the Specialist Writer do a short presentation to say a bit more about the thinking behind the Expectation, the wording of that, but then we had three members of the advisory group, the teachers within the four sessions, to act as kind of discussants. They split up the indicators into the approved subheadings and just did five minutes of saying from their perspective what the issues were and why we got where we got to and what their take on it was from their own perspective […] that led into the small groups, the teaching events, then discussing the Indicators and the issues that came out.

> We had a couple of brief presentations from members of the Advisory Group and then we had small group breakouts and those were facilitated by members of the Advisory Group or QAA staff associated with the project. And so the small group discussions were the bulk of the time I would say there were maybe 5, 6, or 7 at the table and we literally took the Expectation and the Indicators and we talked through each one of them and we were to write down problems or alternative wording or places where it was unclear. So each of these groups was doing this and talking, talking, annotating, annotating, not the text, underneath it, just the Expectation and the Indicators. And for my part it was, became very clear where the weaknesses were.

The breakout sessions were particularly successful, with 97% of respondents stating that they were useful and informative (QAA 1, p.4), as one attendee stated: 'the group exercises were most valuable and the makeup of the groups around the table seemed to have been carefully chosen in advance to include all types of providers' (QAA 1, p.12).

For the Advisory Group members, the consultations allowed them to get a sense of the sector response to the Chapter and interviewees recorded a high level of consistency across the four events, which is also verified in the comments reflected in the consultation event reports (QAA 1, 4).

Around the time of the consultation, the QAA also ran a number of workshops with stakeholder groups to gain further feedback on the Chapter:

> We did some specific workshops with particular groups, so the SEDA conference, we did a conference there, we did a workshop at an NUS conference with student reps, we did a workshop with some e-learning specialists.

This engagement with other stakeholders was picked up by one of the educational developers interviewed:

They've done a lot of consultation. They really did try very, very hard to engage lots of different people from across the sector, and worked well with the NUS on it as well (10).

Attendees at the consultations and the sector more generally were invited to submit a formal response to the Chapter through a Survey Monkey questionnaire. Around 100 responses were received:

> I forget the figure, but I think we had 100 written responses, with varying levels of details of course. But I think we did get reasonable consensus coming through from the consultation responses and from the views of the Advisory Group.

There was concern, voiced by consultation attendees, that the onus was on the individual to complete a formal submission:

> QAA should be confident in capturing all the points made and taking them back – not assuming we will also write it out for you in feedback. It's worrying that the staff in my group weren't confident in being able to do that (QAA 1, p.9).

The outcomes from the consultation events and formal responses were collated by the Specialist Writer and fed into the final meeting discussions.

Final meeting

The Specialist Writer then worked with the data from the consultations and the formal responses and redrafted the Chapter accordingly. The Writer prepared a paper outlining what changes had been made and why based on his reading of the feedback:

> At the end of the consultation period we, near enough eight weeks, we collected together all those formal responses which have been submitted electronically. In this particular case, we didn't do a great deal of analysis, we did read them, we left the analysis to the Specialise Writer and he looked at all the results, pulled together the themes and revised the draft on the basis of what the responses were saying. And then the third meeting of the Advisory Group is to look at that feedback and to look at the revised draft.

> The Specialist Writer then took all the responses away and went through them and identified the key issues in writing from them and the things he thought ought to be changed

> I do remember that in the [third] meeting there was some feeding back. There were, here's the key issues that came up in the consultations and here's how we've addressed them in the draft. And, of course, because people had been in consultations, there weren't big surprises to anyone. I think the group, as a whole, had this sense of wanting to know what the consultation had yielded and wanting to know where we needed to make change. And then we rolled our sleeves up again over the

Expectation and the outcomes, and the Indicators, and we would by then have been dealing with the supporting texts

The final meeting involved agreeing this draft:

The third one was right at the very end, to kind of agree pretty much the final word, the final thrust of the Chapter.

This represented the end of the process for the Advisory Group:

We didn't have much more to do, and we circulated drafts where if people felt strongly could make edits to the supporting text

Most of the Advisory Group members did not envisage further work on the Chapter: 'there were no expectations made for any continuation to the group, certainly not formalised and open, anyway'.

Chapter launch and review

The final draft was then heavily edited by the QAA to ensure consistency of vocabulary with other chapter in the Code, which consultation event attendees had deemed very important (QAA 4, p.11). The Chapter was then signed off by the Code's Steering Group and published in September 2012:

We come to a final draft which, then again, goes through QAA's internal processes and also for each chapter it's signed off […] and we publish it.

The Chapter had a joint launch event in November 2012 along with Chapter B5 on Student Engagement:

It was the first time we'd done this kind of launch event. We did it on the basis of an opportunity to talk about the chapters and actually give delegates a chance to interact with each other and talk about student-focussed ideas.

The publishing of the Chapter did not end the process of its development. The complexity of the development of the whole suite of chapters within the Code meant that checks for consistency are on-going:

Once we've finished all the revisions and updates, we are going to go and look back over the whole thing and see if there's anything that needs harmonising out.

It wouldn't be until all the sections of the Code were finished and indeed until they'd finished revising Part A that they then, the intention was that they stand back and look at fine tuning and getting the language consistent between them all.

The QAA has a published protocol for revisions to the Code (QAA 2). Revisions are classed as factual updates, minor and major revisions. The QAA, or anyone with an interest in UK higher education can highlight the need for a revision and the scale of that revision will be decided based on the nature and scope of the change (QAA 2). A programme for chapter reviews is put in place, but it is likely that the Chapter will also be reviewed earlier than would ordinarily be the case because it is completely new:

> For all the new chapters, there will be a relatively early review, something around two years. Just because, being new, it's got to go back and look at whether they've done what we hoped they would do, since we would normally wait five years for a review.

The Chapter will be a reference point for QAA coordinated reviews from August 2013 onwards

Reflections on the Development Process

Overall, the Advisory Group members reported a very positive experience during the development process:

> Challenging, frustrating at times, but overall a very good, a very good experience.

> I fear I'm presenting a rather Pollyannaish picture, in fact I was, I was impressed. It gave me more faith in policy. Now I don't know whether policy always works this way, I don't think it does. But in this case, it worked.

> I actually thought it was quite smooth. You know, considering it was a new chapter.

Consensus, through informed discussion, resulted in a Chapter that captured the issues of the sector. The next section will look in more detail at the form and format of the Chapter and explore Advisory Group members', consultation event attendees', and educational developers' reactions to its structure, language and content.

The content and structure of the Chapter and educational developer responses to it

Shape of the Chapter

The Chapter shares the same structure as the other Chapters in the Code. This was reflected diagrammatically in the QAA's document on proposed changes to the Academic Infrastructure (QAA 5).

The introductory section leads to the presentation of the Expectation, which sets out what 'all UK higher education providers should expect of themselves and each other, and that the general public

can therefore expect of higher education providers' (QAA 3, p.2) in the area of learning and teaching.

The Expectation is extremely important in the Chapter as it 'expresses the key principle that the higher education community has identified as essential for the assurance of academic standards and quality within the area covered by the Chapter' (Chapter, p.1). Higher education providers should be able to show that they can meet the Expectation through their 'management and organisational processes' (QAA 3, p.2).

The Chapter's Expectation calls for a systematic approach to institutional learning and teaching practices that will enhance students' disciplinary knowledge and transferrable skills. The Expectation is given in full below:

> Higher education providers, working with their staff, students and other stakeholders, articulate and systematically review and enhance provision of learning opportunities and teaching practices, so that every student is enable to develop as an independent learner, study their chosen subject(s) in depth and enhance their capacity for analytical, critical and creative thinking (the Chapter, p.6)

The Expectation was warmly received by the educational developers: 'I liked the notion of an overarching Expectation' (10).

There is a brief introduction to the Chapter, the scope of learning and teaching covered in the Chapter, an overview of what contributes to effective learning and teaching (equality, diversity and equal opportunity; working in partnership; teaching and support for learning), and finally a section on how assessment relates to learning and teaching. The Expectation is supported by a set of nine Indicators of Sound Practice.

Each Indicator is introduced, explained, and supported with an 'indicative list of reference points, guidance and examples of good practice'. The Indicators are there to: 'suggest ways in which higher education providers may wish to demonstrate that they are meeting the Expectation' (QAA 3, p.2). The Indicators cover the following topic areas: strategic approaches to learning and teaching; provision of equal and effective opportunities for learning; teaching and learning informed by reflection, evaluation, professional practice and scholarship; appropriate qualifications for those who teach and/or support students; monitoring the effectiveness of learning and teaching practices; maintaining safe, accessible and reliable learning environments; providing students with clear information; enabling students to understand their responsibilities in the learning process; provision of feedback and opportunities for dialogue to enhance learning. Like the Expectation, the Indicators were well received and there was the correct number of them: 'I don't think you want any more

than that' (6). The Indicators were followed by text, which aimed to provide more detail about the Indicators. One interviewee questioned what added value the text gave: 'it doesn't feel that the document gives you any more detail than what you get in the Indicator. But this itself is a very useful thing to have' (9). Each Indicator ends with reference points, if readers were interested in finding out more about the specific areas: 'they point you to some really good resources […] I think these little boxes are really helpful (10). Where appropriate, links are made to other chapters within the Code. The Chapter ends with an appendix, which sets out the Expectation and the Indicators in list format. A second appendix names the membership of the Advisory Group for the chapter.

The educational developers felt that the Chapter was nicely designed and easy to navigate:

> I quite like them. I think they're very erm I was going to say 'pleasantly' but 'pleasantly''s not the right word, but you know, just the way they are designed, these documents, and the typeface they use, and everything, they're quite accessible (8)

There is also good signposting to other parts of the Code, making it possible to see quality more holistically than before:

> I think they make good links to the other chapters of the Code continuously throughout [...] There is quite good signposting within this chapter of how it interrelates, particularly with the assessment, with the collaborative provision and programme design (10).

> I think there's probably much more awareness of the whole set now, whereas I think in the previous system, people did focus on the appropriate codes of practice for them, without actually seeing that as part of a more coherent whole (1)

The educational developers were not sure, however, that the Chapter would have much impact on learning and teaching practice. The aim was not to change as there are no imperatives in the document, more to sustain good practice:

> Most institutions would be able to meet the expectations of the chapter, without having to do anything unnecessary (1)

This sense that many of the Indicators of Sound Practice were already happening within their institutions was present in other interviews:

> I read this and, you know, a lot of it we are doing, and a lot of it we are probably doing really well (7)

For some this was seen as a good thing, as they felt they were on the right track; for others, it was limiting.

Overall, the feel of the document was more suggestive of quality enhancement than quality assurance:

> It's about quality enhancement as well as quality assurance and I think these documents actually bring that to life a little bit more. While the older documents used to say it, but it was still about assurance. Whereas these, the new Code, actually does help you to understand what they mean by enhancement, and how that plays out (10).

The data supports this. The word 'assurance' (n=9) is used less frequently than 'enhancement' (n=15). The emphasis here is less on regulation and more on self-evaluation. This is apparent in other areas of the Chapter, where higher education providers are invited to, as well as 'assure themselves', 'reflect' and 'consider' their practice:

> Indicators are not designed to be used as a checklist; they are intended to help providers reflect on and develop their regulations, procedures and practices to demonstrate that the Expectations in the Quality Code are being met (the Chapter, p.1).

> They [higher education providers] consider whether examples and resources used in learning and teaching are drawn from a sufficiently broad range of sources, cultures and viewpoints (the Chapter, p.11).

> In addition to subject-specific content, higher education providers consider the way their strategic approach reflects themes that cross subject boundaries (the Chapter, p.8).

This suggests a movement away from bureaucratic approaches to quality assurance towards more reflective and developmental quality enhancement procedures. It could be that the positive response to the Scottish Enhancement Led Institutional Review (ELIR) over the last decade (Saunders 2014) has encouraged the QAA to adopt more enhancement-led quality assurance mechanisms across the whole of the UK. The on-going nature of quality enhancement is highlighted through the use of the present continuous tense:

> The Expectation in each Chapter is accompanied by a series of Indicators of Sound Practice, and through which providers can demonstrate they are meeting the relevant Expectation (the Chapter, p.1).

In general, the educational developers found the Chapter an accessible and well-written document. They recognised, however, that this would not have been an easy document to write (9, 10).

Word Choice

These difficulties of writing such a document were confirmed by comments within the Advisory Group interviews. Selecting the right words proved a challenge:

> This phrase and this word and that word, to try and get it right. And I remember at one stage, we had something that was so watered down […] so woolly and so, that every, really every word that you're seeing here was debated and discussed

In addition, selecting words that were sufficiently generic to ensure the Chapter was applicable to the diverse higher education sector also proved difficult to do:

> You've got to write things which are adaptable to any particular culture. So the language should be fairly neutral […] it's generic values, owned by the sector, rather than values of the institution.

Running to only twenty-seven pages, the Chapter's writing is, by necessity, concise and to-the-point. The educational developers welcomed this:

> I think it's a remarkable job, actually, to summarise it in a relatively clear and relatively powerful way (5)

> They must invest a lot of time into ensuring this is readable. I didn't think that, there wasn't actually as much as it as I thought there would be (7)

The developers felt that the Chapter was well written, clear and quite self-explanatory. It was deemed to be accessible, and relatively jargon free:

> I think they [the QAA] work very hard to keep their language clear, although, because it's policy language, people are always going to find policy language difficult. But my impression is that it's very consciously written to not be ambiguous and not to use what people perceive as jargon (5).

> I think the language is, it's much better than they were, as separate chapters (10)

> I love the language in it [Q: do you think it's accessible?] Yeah, I do. I mean, I say that as a teaching and learning specialist, so we have to sort of take that into consideration, but I can't see any jargon in there [8]

A frequency analysis shows that if common words (such as 'a', 'the', 'of' etc.) are removed from analysis, the most frequently occurring words are: learning (n=281); education (n=158); higher (n=153); teaching (n=103); students or student (n=88 and n=72); providers (n=83) and staff (n=67). Table 1 offers the numeric frequencies of individual words where n>25.

Individual Word	Frequency	Individual Word	Frequency

learning	281	Code	41
education	158	assessment	40
higher	152	support	39
teaching	103	publications	37
students	88	study	36
providers	83	pages	33
student	72	academic	32
staff	67	InformationAndGuidance	32
chapter	62	development	30
QAA	60	programme	27
quality	58	effective	26
opportunities	49	feedback	26
practice	43	professional	25

Table 1: Frequency list – words in the Learning and Teaching Chapter

These frequencies can be shown visually, through a word cloud. The larger the lettering, the more frequently the word was used within the Chapter (see Figure 2).

Figure 2: word cloud of frequencies in the QAA Quality Code Chapter on Learning and Teaching

The frequency list is not surprising given that this is a chapter devoted to 'learning' and 'teaching', it is written for 'higher education providers', and it impacts on 'staff' and 'students'.

While not dealing specifically with 'assessment' (n=40), it is mentioned frequently, and often in association with 'feedback' (n=26), reflecting the boundary delineated prior to development where only formative assessment was included in the Chapter. The developmental focus of the Chapter is reflected in the use of words such as: 'development' (n=30), 'support' (n=39) and 'opportunities' (n=49).

For these educational developers, there was nothing unusual about this language; it was relatively 'comfortable' (4). Indeed, 'it was talking to me in a language that I could understand' (2). Just because they could understand it did not mean that everyone liked it. One interviewee was not

taken by the language of the Chapter at all, which they described as: 'loose', 'flabby', 'dry' and lacking definitions (9).

Like it or not, for the developers, it was 'bread and butter language' (9); other academics might not be so comfortable with the language:

> I don't know whether it's because I'm comfortable with the language that I find it very accessible, and it might be an idea to try it out on some brand-new members of staff and watch them go 'blip' (6)

> It may be that some of the terminology is more challenging for others who are less familiar with it (2)

> Academic colleagues have a particular reaction to the language in the Quality Code, and you know I think I'm quite accurate, because their lives are different (4)

And this was noted by a member of the Advisory Group, who recognised that the language was more likely to be accessible to those with a quality remit: 'I think a lot of people still find it quite difficult to interpret and if you're not use to quality speak.'

The Chapter is not, however, written to be interpreted by frontline staff; the Chapter is directed at the 'higher education provider'.

The higher education provider

The Chapter makes frequent reference to 'higher education providers' (n=33). The Chapter also uses: 'degree awarding body' (n=8) and 'learning provider' (n=1) to refer to those who deliver higher education. The word 'university' is not used at all within the Chapter, except to show provenance of the Advisory Group Members, nor is the term 'institution'. This is in stark contrast to the Code of Practice (2010) that this Chapter supersedes, where the most frequently occurring subject was 'the awarding institution' (see discussion of this in Smith 2010).

While the Chapter does not define 'higher education provider', the choice of this term reflects the changing nature of higher education. While traditionally, higher education was predominantly situated within the university sector, this is no longer the case. Higher education can be delivered within further education institutions, through partnerships with collaborative partners, within workplace situations, and through private providers. This Chapter has been written for a very diverse sector, guiding all who provide higher education.

One of the advisory group members reflected on the challenges that a decision to use the term 'higher education provider' raised:

> Another thing we struggled with with the indicators was where the responsibility lies. So we debated about, okay, do you say higher education providers do x. But actually the people who do this are not, I mean what is a higher education provider? There's the personage there, there's the actor, the agent. So we talked about departments doing things, we talked about individual staff doing things, and we had quite a little run around the field, if you will, on that issues of who's the agent, who's the subject in these indicators. And in the end, I think we were steered by the [QAA] staff on the group to say, ultimately, we're accrediting institutions, so the institutions are responsible for this and how they do it is their business.

The Chapter clearly sets out what is expected of the higher education provider in terms of creating the conditions for effective learning and teaching through: a learning and teaching infrastructure, systematic and strategic approaches to learning and teaching provision, clear communication with stakeholders, the evaluation of their approaches to learning and teaching, and partnership working (between staff, students and other stakeholders).

The choice of the word 'expectation', which means 'a strong belief that something will happen or be the case', over 'requirement', which means 'a thing that is compulsory; a necessary condition' focuses attention away from the regulatory body towards society and what it looks for from higher education. The tone of the Chapter is not about the higher education provider fulfilling the QAA's requirements, but more about them establishing their position in tertiary education through operating in ways that are deemed acceptable for higher education providers within contemporary higher education. The Chapter maintains this non-regulatory impression throughout. In contrast to the 2010 QAA Code of Practice, which made heavy use of the modal verb 'should' (see Smith 2010), this Chapter makes little use of modal verbs (such as 'must' or 'should') to express necessity. This shift in language was quite deliberate, as one Advisory Group Member points out:

> I suppose one of the big changes in the Quality Code compared to the academic infrastructure is the language that we use in terms of we don't use 'shouldn't', 'must' or, we'll just state 'higher education providers do this' and that was a decision very early on that that was the best way to communicate and that was an internal QAA decision that that would be the style of language we would adopt within the Quality Code.

Whether this was completely successful is debatable; one educational developer still felt: 'it does have that 'this is what you are going to do", which is a bit irritating' (7).

Envisioning higher education through 'timeless truths'

Rather than modal verbs that tell higher education providers what they have to do, the Chapter employs the simple present tense. This creates the impression of 'timeless truths' (Palmer 1985,

p.63), where what is written is presented as something that was true, is true now, and will continue to be true in the future. These truths are taken-for-granted, indisputable and uncontested, and their use supports the reading of the Chapter as an expression for the sector set out by society and not just the QAA, as demonstrated in the following extracts:

> Higher education providers involve students in developing, implementing and monitoring the strategic approach (the Chapter, p.8).

> Higher education providers have in place transparent staff recognition and reward processes, and promotion opportunities for all career paths (the Chapter, p.15).

> Higher education providers maintain physical, virtual and social learning environments that are safe, accessible and reliable for every student, promoting dignity, courtesy and respect in their use (the Chapter, p.18).

The use of the simple present paints a particular picture of higher education which is assumed to be universally accepted due to the consultative nature of its development. In general this picture was accepted by the educational developers and some content areas were actively welcomed, namely: education for sustainability (7); learning spaces (7, 8, 10); assessment for learning (7, 10); links to the Higher Education Academy's UK Professional Standards Framework (UKPSF) (1, 10); inclusivity (2, 3, 10); Personal Development Planning (PDP) (3, 10); and recognising good teaching (8, 10). The content reflected what the developers expected to see in a Chapter on learning and teaching:

> Nothing in here is a surprise, nothing in here is something I have not thought about or don't think is relevant to the student experience (5).

> On my reading of it, there wasn't anything that jumped out at me that was, that didn't work for me, or that I saw as a significant weakness (1)

> It's a document about learning and teaching, isn't it? And it does address what many people, probably including myself, would see as the most important aspects of learning and teaching (7)

If anything, the messages were uninspiring. The content was deemed 'inoffensive' (4), 'bland' (1), 'commonsensical (6), 'not unreasonable' (7) and so familiar: 'to the point that I even felt a little bit bored at times' (8).

This was picked up by one of the advisory group members:

> Educational developers, they will look at that and they will say 'yeah, fine, so what?' Because I suspect most of it is just bread and butter. I can't imagine that there will be many people with real interest in learning that will have significant problems with any of the indicators.

The use of present-tense 'timeless truths' to outline the expectations of the sector regarding learning and teaching for higher education providers might not be exciting, but it is a strong persuasive device, which offers an irrefutable vision of higher education.

Contested visions

Not all visions of higher education the Chapter contains are irrefutable; some are contested. For one educational developer, the inclusion of concepts, approaches, and terminology that were not universally accepted was not seen as problematic but 'actually very useful' (5) as it resulted in much needed debates. This was not the case for all the developers interviewed.

The Chapter makes reference to two terms in particular that bristled with some of the educational developers: learning styles and learning outcomes. Through the use of the simple present tense, the Chapter outlines its expectation that higher education providers will recognise that students have different learning styles and that the learning and teaching activities will enable students to achieve the learning outcomes which are assessed through appropriate assessment:

> Higher education providers recognise that students have differing learning styles (the Chapter, p.11).

> Once determined, the learning outcomes for the programme of study map directly to the summative assessment, with the assessment methods being appropriate to offer every student an equal opportunity to demonstrate their achievement of the intended learning outcomes irrespective of how and where the student has studied (the Chapter, p.10)

The choice of wording in these statements presents both learning styles and learning outcomes as accepted and unchallengeable elements of the higher education experience. The Advisory Group recognised, however, that members of the higher education community might well have issues with these concepts as they are not as innocent as this presentation suggests. The Advisory Group member felt, however, that they were sufficiently embedded within contemporary higher education discourse and practice to warrant inclusion:

> The whole question of intended learning outcomes and the extent we referred to those or to something nebulous […] and again we resolved it. But there was certainly a member of the group who made it known that their view was that intended learning outcomes weren't the be all and end all of higher education anyway. It was more a principle objection to the concept rather than how it's linked within the Chapter. But you know, they were accepting that the reason, our reasons for including it were consistent with the rest of practice.

The Advisory Group member was right, though, as some educational developers did take issue with these terms. The lack of recognition of their contested nature (while sometimes understood) was

seen as an issue as readers may not be aware of the critiques of some of the learning and teaching practices proposed:

> The fact that, with learning styles, if you're going to go there, it's controversial, so make that reference. So, I was a bit shocked to see it, given the authors, I was a bit shocked to see it (9)

> I wasn't overly fond of all the stuff on learning outcomes, by the way, I do have a problem with some of those anyway [...] There is stuff about learning styles, and I kind of have, for different reasons, I've got reservations about both but for different reasons. However, I don't blame them for making reference to them (7)

A final area that stimulated debate within the Advisory Group meetings, the consultation events and the educational developer interviews was around the notion of partnership, another contested terms that is discussed in more detail below. The treatment of this contested term differs when compared to those discussed above.

Partnership learning

One of the central themes within the Chapter is that effective learning occurs when there is 'a partnership between the higher education provider, their staff and students, and any stakeholders'. The noun 'partnership' is used n=8 times within the Chapter.

'Partnership' often collocates with 'work' or 'working'. Such partnership learning, it is suggested, 'can empower'. The introduction of the modal verb 'can' adds an element of uncertainty to the phrase. Partnership learning may not be empowering to all students. This use of 'can' makes the benefits of partnership learning less universally accepted than other approaches to learning and teaching described in the Chapter (i.e. learning styles and learning outcomes). This may be due to the fact that partnership learning is still relatively new and therefore less well established.

The Chapter holds that the development of independent learners, which is linked to partnership learning, is a key feature of a higher education:

> A key characteristic of UK higher education is the emphasis placed on students to engage in independent learning, working in partnership with staff and displaying academic behaviour and integrity appropriate to the level of study (the Chapter, p.21).

The use of the term 'independent learner' led to much debate within the Advisory Group and also within the consultation. The concern was that it did not encapsulate the essence of higher education because 'so much of the pre-higher education, further education, and even secondary education seeks to develop independent learners'. This led the Advisory Group to spend some time trying to

ensure that the Expectation had 'more of a focus on higher order skills and ways in which they were important to higher education as distinct from FE or school-level education'.

In order for students to achieve independence in learning, the Chapter states, means: 'there are always some opportunities for students to shape their learning experience' (the Chapter, p.21). The inclusion of the determiner 'some' somewhat limits the commitment made here to co-constructed curricular, as 'some' can be defined as 'at least a small amount or number of'. This use of such language allows the higher education providers to determine the extent to which they engage with partnership learning. This is further established through the ensuing two clauses:

> For some students this may not extend beyond selecting optional modules, undertaking additional reading or practice of relevant skills. For others it may extend to the negotiation of assessment titles or engagement in self-selected research for a dissertation or equivalent practice-based module (the Chapter, p.21).

The result gives the impression that the Chapter does not want to push higher education providers too far in terms of their approach to co-construction, but gives them license to partake if they want to.

In terms of their partnership role, the Chapter is clear about what is expected of staff and students. It is the teacher's role to 'empower learners with confidence to participate, critically and creatively, in the study of their subject area(s)' and that students will 'depend' on interaction with staff and peers to support their learning. This suggests student-centred approaches to learning rather than more teacher-centred models. Higher education providers are expected to create an environment that is conducive to learning and also to ensure that the resulting opportunities for learning and clearly communicated to the students. While higher education providers should provide opportunities for learning: 'the effectiveness with which the learning opportunities are used is a matter for students themselves' (the Chapter, p.4). While the Chapter has been written to safeguard student learning, it is clear within the Chapter that students are expected to work hard. What the Chapter does not discuss is how higher education providers should deal with students who do not make effective use of the learning opportunities (e.g. they do not engage in reflection on assessment or interact with staff and peers to support their learning). This was raised by one educational developer; they were in principle in favour of the 'student as partner' model, but suggested that not every student wanted the partner role and that the Chapter did not really offer guidance on how to encourage students who were not motivated to work in this way:

> It simply assumes that students will be doing things, and although it's all very well seeing students as partners, and on paper it is empowering for students. I think the concern I have with some of these

assumptions is that actually students might want to just get their degrees out of the way as quickly as possible (7).

Attendees at the consultation events also raised concerns about the use of the term 'partner' and 'partnership'. Some of the comments included: '"working in partnership with students" needs more discussion at sector and institutional level'; 'would like to explore the concept of students as partners more' (QAA 1, p.10); and 'perhaps "partnership" is overused' (QAA 4, p.10).

The partnership role also extends into aspects of learning and teaching management through the use of the phrase within the Expectation: 'working with their staff, students and other stakeholders' (the Chapter, p.6) in order to enhance the provision of learning opportunities. This phrase is vague. It is not clear how 'working with' can be interpreted.

This choice, however, was deliberate, as an Advisory Group member noted:

> We ended up saying 'working with staff, students, and other stakeholders, so I think, we know, you can actually see we didn't use the word partnership. We were uncomfortable with partnership. It came out of the consultation process as well that people were uncomfortable with partnership.

While an underpinning approach within the Code, the treatment of the word 'partnership' in the Chapter, with the introduction of determiners and modal verbs, shows some uncertainty in the robustness of the notion and its acceptability across the sector. Other areas of learning and teaching practice received similar treatment.

Uncertain content

The areas where the language is much less confident refer, in particular, to the provision of resources, lecturer development, and professional development planning. There appears to be less certainty about the universality of what is being proposed. This is shown linguistically through the use of the modal verbs 'may' and 'can', which suggest uncertainty (Halliday & Matthiessen 2004,p.147) and the quantifier 'many', which limits a clause's universality:

> Aspects considered may include any or all of the following: working with staff development teams; having online continuing professional development resources and modules for staff; and ensuring the availability of sufficient administrative support (the Chapter, p.14).

> The UKPSF provides a UK-wide benchmark by which higher education providers can demonstrate how they support staff and assure themselves that they are qualified to teach and support learning (the Chapter, p.15).

> Many higher education providers factor into the student learning opportunities offered a process based on personal development planning (PDP) (the Chapter, p.22).

Such uncertainty is quite stark in the discussion of staff development within the Chapter. This is discussed below in more detail.

Staff development

The Chapter is very careful in how it defines 'staff' (n=67), which is used in preference to 'teacher(s)' (n=6) and lecturer, which is not used at all. The definition reads:

> The term 'staff' refers to anyone involved in teaching or supporting student learning. It includes, but is not limited to, academic staff, graduate teaching assistants, specialist learning support staff, library staff and technicians employed by the higher education provider. It also includes staff not employed by the higher education provider but who interact with students studying for one of their awards; for example, through a collaborative arrangement or through supporting placement learning (the Chapter, p.5).

This definition is very broad; it is written to incorporate a wide range of people who support student learning, including those who might not be in the higher education providers' employ (e.g. overseas partner staff or employers). As has been shown, this broad definition places a lot of responsibility on higher education providers as they try and support such a diverse group of people who are supporting their students.

The most frequent reference to staff is in relation to their professional development. The Chapter asks higher education providers to assure themselves that their staff are 'qualified', a participle adjective it uses six times. On four occasions 'qualified' collocates with the adverb 'appropriately', for example: 'Effective student learning is facilitated by interaction with appropriately qualified, supported and developed teaching and support staff' (the Chapter, p.13). It is, however, left to the higher education provider to ascertain whether their staff are appropriately qualified and what that would look like within their particular institution:

> Higher education providers determine what is necessary to demonstrate that a member of staff is qualified to fulfil their role in teaching or supporting learning; whether this means the individual holds a relevant formal qualification will depend on the circumstances (the Chapter, p.14).

While responsibility for implementing the Chapter rests firmly with the higher education provider, the choice of wording around the continuing professional development of their staff makes clear that providers can choose the approaches that are most suitable for their own context:

> Higher education providers assure themselves that everyone involved in teaching or supporting student learning is appropriately qualified, supported and developed (the Chapter, p.14).

> Higher education providers determine what is necessary to demonstrate that a member of staff is qualified to fulfil their role in teaching or supporting learning; whether this means the individual holds a relevant formal qualification will depend on the circumstances (the Chapter, p.14).

> Higher education providers assure themselves of the effectiveness of their approach to staff development and support (the Chapter, p.14).

The Chapter does provide examples of what higher education providers might wish to consider in making this decision (e.g. the staff member's knowledge and skills and experience of facilitating learning). The Chapter does not state that new members of staff have to complete a formal teaching qualification. Indeed, the Chapter is not directive about what new members of staff should do. The Chapter expects that new arrival activities be offered but recommends that staff be 'encouraged' to take part:

> Members of staff new to their teaching or supporting student learning role are encouraged to engage in appropriate induction and mentoring opportunities made available by the higher education provider (the Chapter, p.14).

The lack of explicit guidance on how to support new staff and also the decision to use the word 'appropriate' in relation to learning and teaching offered flexibility in the eyes of some interviewees, while for others it provided 'wiggle room', where institutions did not have to provide formalised lecturer development training to all staff or to develop opportunities for continuing professional development (through schemes accredited by the HEA or their institution). This was a concern raised during the consultation: 'the Indicator concerning teacher training it too important to be left implicit or hidden. We owe it to learners to ensure that all staff have sufficient pedagogic understanding and knowledge to meet their needs' (QAA 1, p.10).

A stronger requirement and reference to specific training would have helped some educational developers justify aspects of their work and foster a more progressive approach to learning and teaching. Advisory group members, however, noted that this was not within the QAA's remit and that flexibility of institutional interpretation was needed:

> There's a strong view that staff should have qualifications to teach. I think they [other Advisory Group members] respected the view that QAA can't mandate that. But we can say you should be appropriately qualified and that, in some cases, will be a teaching qualification, but in some cases it will be many years' experience in industry or something.

> Who gets to decide who's appropriately qualified, are we wanting to come forward to make a statement that a teaching qualification, HEA Fellowship, or something is mandatory for everybody. And I don't think we felt comfortable going that […] So I think what we ended up with I felt satisfied, supported, educational development, but left a lot of flexibility for universities to make those decisions

When making reference to existing staff and their continuing professional development, there is a return to the use of the simple present to reinforce, once again, sector expectations. Here staff:

> Once appointed, and throughout their career, staff engage with opportunities to develop and extend their teaching capabilities and to reflect upon their teaching practice (the Chapter, p.14).

It is the responsibility of the higher education provider to ensure that opportunities for professional development are in place. This includes staff 'in need of additional support to ensure their effectiveness' (the Chapter, p.14). This alludes to incompetent staff, who should receive 'support and mentoring to enable improvement of their skills and competency to an agreed level' (the Chapter, p.14). How to deal with ineffective teaching was also a point of discussion within the Advisory Group meetings. While one member felt that explicit expectations of how to deal with underperformance should be articulated, other group members felt that 'the university sector would not respond favourably to that'. The debate was resolved by placing more emphasis on professional development: 'we talked more in the Code about ensuring staff were appropriately qualified and skilled to do the job'; but, as the same interviewee continued: 'that doesn't mean everyone can teach'.

The Chapter makes specific reference to one framework that higher education providers may wish to use to guide their staff's professional development: the Higher Education Academy's UK Professional Standards Framework (HEA UKPSF). The introduction of the modal verb 'can' suggests possibility; the higher education provider does not need to use this framework, but they might find it helpful for assuring teaching quality:

> The UKPSF provides a UK-wide benchmark by which higher education providers can demonstrate how they support staff and assure themselves that they are qualified to teach and support learning (the Chapter, p.15).

Its inclusion in the Chapter, however, was not a given:

> I guess a handful of other members were also very vocal and supportive about it [HEA UKPSF], but there was one particular individual I remember who questioned why, why that should be in there and didn't necessarily believe it should

For the developers, the very fact of its inclusion in the Chapter represents an endorsement for the Framework's use institutionally – but this was not the Advisory Group's intention:

> By referencing heavily the professional standards framework in document, that sort of leads you to flag it up and say this is a model of practice. It's not the only one, by its acceptance by the UK Guild HE been sector endorsed, which gives us a remit to be able to put it in the Chapter. Then sort of again, that sends people off to look at something else as we're not setting up the framework in the quality code, but we're pointing at one of the models.

Since the continuing professional development of staff plays such a prominent role in the document, it would appear that there is a clear place for the educational development function.

Educational developers' (in)visibility in the Chapter

It is clear that the staff and educational development community is not seen as a key stakeholder in the Chapter. There are no references to the word combinations: 'staff developer', 'educational developer' or 'academic developer'.

Some reference is made to the development role. While the terms 'academic development' and 'educational development' are not mentioned (unless in reference to SEDA), 'staff development' is. The Chapter asserts that it is the responsibility of the higher education provider 'to assure themselves of the effectiveness of their approach to staff development and support'. The Chapter goes on to offer suggestions about what this might look like:

> Aspects considered may include any or all of the following: working with staff development teams; having online continuing professional development resources and modules for staff; and ensuring the availability of sufficient administrative support (the Chapter, p.14).

This introduces the possibility of having 'staff development' teams, whose function is to support staff to enhance learning and teaching. Conversely, the higher education provider could just ensure that there were online materials to support development and sufficient administrative support. It is at the provider's discretion to decide how staff development will be supported.

The term 'professional development' is used more frequently (n=7, 4 of which are in combination with 'continuing'). As has been mentioned above, there is an expectation on staff that they will be engaged in professional development opportunities, for example:

> Staff are encouraged to value their own and others' skills, to recognise that they have a responsibility to identify their own development needs, and to engage in initial and continuing professional development activities (the Chapter, p.14).

Equally, higher education institutions are expected to provide sufficient opportunities for professional development: 'higher education providers make opportunities available for all those involved in teaching and supporting student learning to inform each other's practice and professional development' (the Chapter, p.14). These opportunities should be 'planned strategically' and staff should be given 'protected staff time' for engagement in them (the Chapter, p.14). The HEA UKPSF is offered as a means by which higher education providers can 'demonstrate that their professional development programmes and activities meet expected national professional standards' (the Chapter, p.15).

There is a strong focus on professional development within the Chapter and an expectation that higher education providers will offer an environment and sufficient support for staff to feel that that they can engage. This expectation lends itself well to the kinds of work that the educational development community engages in, although they are only identified on one occasion. The Chapter, then, speaks to and of the educational development community without making explicit reference to them. One developer could see the influence of the educational developers who were part of the Advisory Group in the wording of the Chapter:

> It's written by people who work in the field of education, a lot of them in the field of educational development. Educational developers can read it, but they are probably not the people who are going to act on it (9).

The next section discusses in more detail who the educational developers and Advisory Group members felt would drive this policy forwards and the ways in which they expected to interact with it.

The implementation of the chapter and the challenges it poses

Principal quality drivers

The educational developers were very clear that this was a document that was written for senior management, or 'people who sit on committees' (5) and that it was ultimately management's responsibility to ensure that the messages would be implemented and audited as appropriate:

> My expectation for the document is that it's aimed at senior management, registry offices, those involved in institutional quality assurances as their primary audience, and they are expected to recontextualize that for others in the institution (1).

> It is aimed towards institutional leaders (7)

This was also noted by one of the members of the Advisory Group: 'I think it's down to academic managers very much to kind of join this up'.

The interviewees described top-down structures where aspects of the Chapter would be trickled down through committee structures, strategic teams, learning and teaching fellows, policies and procedures, and educational development activity.

There was still a belief that the Chapter was primarily assurance focussed and was therefore predominantly something that quality assurance staff would deal with:

> I know it will be lovely, lovely colleagues who work in quality (4)

> Quality assurance people in the institution (9)

Within the Advisory Group, it was members of quality teams, within their own home institutions or more generally, who were seen as the main receivers of this policy:

> I suppose in some ways, the primary audience in a way that we talk to are the kind of quality managers […] because they tend to be the people who have got the, a hand on the, policy and regulatory framework.

> Inevitably, it will be the quality office staff and quality managers because they have that particular relationship with QAA

> In my own organisation where this is currently being used is in the quality department first and foremost.

Not everyone was convinced this was the most appropriate place for the policy drive to come from, as evidenced by an Advisory Group member, who had a strong educational development remit: 'much as I respect the staff in our quality assurance office, I have more expertise [in learning and teaching] than they do'.

Educational developers' relationship with quality assurance policies and procedures

The interviewees described very different relationships between themselves and quality staff. Some had very little contact at all and others worked very closely together. Where close working was described, it was apparent that the educational developers felt they had a much greater influence on both the development of local (aligned) policy and its implementation:

> I would say that the Quality Office sort of owns the responsibility for ensuring that the Code is implemented, but the fact that we're working closely with them is for me working very well, and everyone has responsibility that the Code is implemented. But I suppose from a learning and teaching

perspective, it's about developing the right policies and processes to ensure that it is acted on within the institution (10).

For those who did not engage with the quality office, there was a feeling that educational developers interpret policy rather than implement it (9). This seemed to be a missed opportunity as educational developers, as specialists in learning and teaching, have a lot of expertise to offer in the area of learning and teaching policy in particular (7).

Educational developers then have a complicated relationship with policy. They might exert influence in the implementation of policy through university initiatives (2), but few were involved in the development of policy. There was a sense, however, that educational developers should be more involved in policy:

> I think that educational developers should have a more consistent role, maybe in implementation, or before that in interpretation of policy [...] I mean some actually have got quite a clear handle on policy, others don't [...] It would be useful if there was more consistent engagement in policy. Because actually all educational developers, surely, are, obviously, they are users of policy (7)

The same was true regarding educational developers' involvement in quality assurance. For some it was clearly not part of their role: 'we deal with, but don't inform quality' (9), even if they wanted to:

> In educational development, we have a key role in actually making policy happen, they [the quality office] need us. We are meant to work together ad we've tried to work with them quite closely, but that hasn't always been reciprocated (7)

This was a source of frustration for one developer, who felt that their expertise was just not recognised:

> It's just recognising that we can bring something to the table. I think that we, some of us, not all of us, have a lot of experience of different types of institutions, and that there's research in this area. You know a lot of decisions are made on feelings that people have about teaching and learning, rather than on the evidence and that really frustrates me. And so the people whose job it should be to know this stuff, like educational developers, are not in the conversation (9)

Another, however, felt they had learnt a lot from working with colleagues with a quality focus:

> I've always been quite interested in quality [...] Working in that little team [with academic quality colleagues] was brilliant for me. Because although I was thinking about the learning and teaching perspectives, their understanding, and huge expertise in terms of quality and the process was so enlightening for me (10).

The lack of direct involvement within policy by educational developers was also at odds with the Chapter which does speak to the educational development community. This view is supported by a comment from Advisory Group members who highlighted that attempts had been made to broaden the audience for the Chapter:

> It does speak to a slightly different audience as well; I mean one would hope that educational developers and a broader range of academic staff would be engaging with this.

Educational developers were more likely to position themselves between management and academics in relationship to policy:

> I guess it's senior management's role to read this document and identify where the document should be re-expressed within institutional policy frameworks. It would be the role of different areas of the institution such as Registry to then develop that policy or check that the appropriate policies were in place and were appropriately worded, and I would see it as the role of educational developers and academic developers going to take what's in here and re-contextualise that for the academic staff going through their programmes and make sure they understand, at least at a practical level, what's expected (1).

This is not always a comfortable place to be:

> There's also a bit of a paradox. In order to be really successful in our role, we have to work with individuals, and we have to be seen to be flexible and accommodating of them, and to work individually, on a personal basis, and not be seen as the 'arm of management' in inverted comas, whereas actually a lot of what we do, and what we believe in, comes from what is happening in the sector and also espoused by management, but it's not the big stick (8)

Educational developers, then, are the 'bridge' (2, 6) between the two and the translators of policy into practice (4). Developers are able to do this because they are in a 'privileged position' (3):

> We do have the helicopter view of an institution [...] In terms of being aware of policy and the decision makers, I know the people who are making the policy decisions and I know where to find those policies, and I know what directly impacts on me. Any my role in a way is to work with staff so they know what's happening, so they know where it's come from [...] I don't tell them that it's because of the corporate planning key performance indicator – that wouldn't sell. I don't tell them it's because an academic paper went to academic board [...] I interpret it so that if I said they had to do it because it's a top-down initiative, nobody would do it. So I sell it from 'this is important for you' (3).

Sited between senior management and academic practitioners, educational developers felt they were there to support the policy leads identified by management into practice through their educational development work with academic staff.

Frontline academic involvement in policy implementation

The developers were equally clear that the Chapter was not written with frontline academics in mind:

> My experience and my belief is that it would not impinge upon the radar in any shape or form of the typical academic (4)

This interviewee went on to outline why there could well be a lack of engagement with the Chapter:

> It feels superfluous to people. They're already busy. It feels that they're already doing that anyway, now with the Quality Code [...] people are not very interested, they believe that it will improve. But there's enough to do, it doesn't feel exciting, or relevant enough, and this sense that this is other people's jobs (4)

And one interviewee felt this was right; teaching academics' priorities lay elsewhere:

> I think it's completely right when someone comes in as a subject lecturer. That's their priority, the discipline and the students and their immediate colleagues should be their immediate priorities, and I wouldn't expect them to get to grips with many of the things that policy-makers or managers in education have to deal with (5)

While another did not see lack of frontline academic staff engagement as an issue as long as policy was well aligned:

> They might not be aware of it on a day-to-day sense. But I don't think that's necessarily a problem. Especially not if your policies and processes within an institution ensure that you are aligned with it, so that your day-to-day activities automatically are doing this (10).

While the Advisory Group members shared the views that the Chapter was not aimed directly at academic staff, one member did suggest that attempts had been made to include them:

> It's naïve to think that academics routinely pick in the Quality Code and take it to bed with them. But, you know, I would hope that there is something in the Chapter that would not tell them off, but what they would actually say is that's interesting and that fits with my view of the world and they don't see this as a piece of bureaucracy by QAA designed to tie them with tape.

The extent to which this was achieved is debatable, as one educational developer noted, they still felt 'a little tiny bit patronised (7)'.

While the Chapter was not written specifically for either educational developers or frontline academics, the intention was to make the document more accessible and therefore more usable. While recognising that education developers did not often lead or develop policy, they are, as one developer noted: 'obviously, users of policy, even if they don't know it' (7).

Learning and teaching policy in practice

The educational developers laid out a range of ways in which they would use the Chapter within their own educational development work. It is worth noting that the majority of educational developers had not read the Chapter before being invited to participate in the research (though for many it was on their 'to read list' (1)). The research project had led them to think through more deeply how the Chapter could be used and it is likely that this group of educational developers may use the Chapter more proactively as a result of their participation. What follows is how the developers envisaged or were using the Chapter already.

To prepare for quality procedures

One of the clearest, and perhaps the most frequent, uses of the Chapter was in preparation for QAA visits (both for institutional audit and also in preparation for ELIR in Scotland):

> Until there's an audit, I suspect that it may sit on somebody's top shelf (3)

> There's a big focus on QAA issues because we're due a QAA visit. Now, when that visit has taken place [...] it won't have the same kind of impetus that it does at the moment (2)

This was also highlighted by members of the Advisory Group: 'in order to prepare their institution for a review, we need to be able to demonstrate that we've done everything that the Quality Code says'. Advisory Group members also outlined how it could be used in benchmarking and mapping exercises, while one considered how QAA reviewers themselves might engage with the Chapter.

At an institutional level, the Chapter is used to prepare for programme validations:

> The most that they [academic staff] would do if they have to for the purposes of validation (4)

> People use these documents when they need to, so when they're coming up to review and validation, then they will approach them (10)

Through these quality assurance procedures, the Chapter is influencing institutional decision making and also ensuring learning and teaching practices were more transparent.

To support personal professional practice

On a more personal note, the educational developers recounted how the Chapter could be used to support their own practice. Interviewees were also using the Chapter to shape their own teaching practice; they felt it was important to model good practice for their participants:

> As people who are teaching, and teaching recognised university courses, we need to behave in a way which puts this document into practice. So, we need to be doing that, just as the fact that we're academics working within the institution in a learning and teaching role as, secondly as educational developers, we need to be seen to be doing that, in terms of, everyone knows the policy is there, or should do, and therefore we should be leading by example in terms of how it informs our practice (1)

> I'm acting as an academic in terms of that course [Postgraduate Certificate in Higher Education], so I'm subject to those codes the same as everyone else. So helping me think through what I'm doing and whether I'm doing it as I should be (8)

For some, this was not at all difficult as the Chapter closely aligned with their own professional values:

> It supports my values, it supports the work that I'm doing, which means I'm not out of kilter as well (3)

> It really chimes with how I feel about education (8)

The Chapter, then, is a useful resource to frame the educational developers' own professional practice.

As a resource for taught courses

The interviewees also provided examples of how they could (and do) use the Chapter within their own educational development work. It was felt that the Chapter could be drawn upon as a resource within institutional postgraduate certificates in higher education (or equivalent). A number of interviewees talked of how they would share, discuss and critique aspects of the Chapter with their participants. Again, the Chapter adds credence to what is being taught:

> I'll use it in my programme, and we will examine it, we will critique it, and we would talk about language (4)

> I'm sure I will make reference to this in that teaching. It has obvious relevance. It can actually be used to support some of the things you say, and teaching, and it might be useful to get students to read it at some point as an exercise (7)

I saw in it some useful links to be made to some of our postgraduate certificate provisions and that it would be useful within the postgraduate certificate if, at the appropriate junctures, we highlighted the different Indicators within the Chapter and in other chapters, but actually bring in some of the text and say 'this is what the learning and teaching chapter of the Quality Code says about this particular aspect' to provide a bit more knowledge and insight for the academics going through this process into what the Quality Code is and make it a bit more accessible for them, but also to demonstrate that our development that we provide is actually framed and informed by national development quality expectations (1)

As a staff development tool

Aside from new lecturer development, it was envisaged that the Chapter would be used to shape other aspects of educational development. It was seen as a means of starting conversations about academic's own learning and teaching practice:

It was about finding the common ground, and the way that I've done that with people is by being very intuitive and responsive to their subject discipline – get them talking about that because people love talking about their subjects and about their students, and then you can match, so you know the things that are very present in the Quality Code, to what they're doing (4)

And using the document within the quality assurance processes that they were involved in:

I would use the Quality Code as a launch pad, and I'm doing some validations in the next few weeks that I'm chairing. So, I know I'm able to convey to partners in very simple language 'this is what we're looking for' (4)

So, it's there and it's been very useful this week because one subject group was trying to get rid of PDP in their curriculum, in going through revalidation. And I was able to say that it's still there (3)

The uses of the Chapter as a staff development tool, a means to stimulate discussion or a reference document were also recognised by members of the Advisory Group:

This is an opportunity for educational developers to use as a sort of framework, almost, that illustrates practices that could then, and use that as a way of developing teaching practice within their institutions.

We do have some sort of anecdotal feedback that people doing staff development workshops have taken the Chapter and the Indicators and have sort of used them as a 'so what do we do that comes under this' and that has been a very useful approach and they've found it a useful tool to get people thinking.

I think it can be useful to help debates with new members of staff around what is teaching and learning. I mean you can have a debate about teaching and learning and then you can show them the Code and say, okay, to what extent does this match what we've talked about here match the areas of the Code.

I hope educational developers and others working with the Code will find it a useful reference document; but I do not expect it to have a profound impact on the nature of the learning experience for students.

To champion change

The Chapter could also be used to foreground certain aspects of educational development work, which the developers were keen to champion:

They're engaging with the things like the QAA Code because it's legitimising and endorsing the things that they want to do and they want to use e-portfolios and be more creative and all these kinds of things (2)

I thought there were lots of bits of it I could use for institutionally arguing the case for some developments that I want to push forward in the institution (8)

I think what's really nice about it is that it reinforces what we are trying to do on inclusivity, And it gives us a bit more of a stick, in some ways. It's all very well talking about inclusive practice [...] but actually having things written down in here, it just gives you another support mechanism to say 'this is crucial and it's a requirement' (10)

One interviewee was involved in the development of the continuing professional development programmes within their institution that were aligned with the HEA's UKPSF. The reference, in particular, to the HEA UKPSF within the Chapter reinforces this as an important part of the institution's work to promote continuing professional development.

It links so strongly with the UK professional standards, which is perhaps the most dominant thing in my role [...] in my conversations with staff, they are going for Fellowship or Senior Fellowship of the Higher Education Academy, but we talk about 'well what is it that you do', 'why do you do it', and 'how do you know it works'? So, this complements. I'm not asking questions outside the QAA. The QAA are also asking those questions [...] It supports what I am doing, and I know that when we come for the next audit, I can say, hand on heart, we are addressing these things, so it's not frightening and the staff have got the language now to talk about it (3).

This kind of use is something that an Advisory Group member had also envisaged:

I hope it is supported and it is something they can use alongside any other policy initiatives that are developed, alongside the PSF in particular, and anything else that others might produce that fits with this.

To justify the educational development function

The Chapter could also provide an external justification for changes that staff might be more resistant to:

> This could be used as a document to say 'well, you know, the University has to do this, the University has to do it because of national policy, QAA for example, if you want to see an example, have a look at this chapter, you know, we have to do it, sorry' (7)

> When they see a national document saying 'this is how it should be done', it just gives a bit of grunt, I think, to what we're doing here (6)

> You can point them [staff] to this and they say 'this isn't just what we're asking you to do' (10)

> I could use some of that stuff and say 'well actually, the QAA says ...' and some people might actually like that (8)

This use was also recognised by members of the Advisory Group:

> It's useful in the sense that we can say, 'you know, this is important to us, but also, we're going to assessed by the QAA on this, so we need to make sure that these things are happening' […]even internally, within institutions, it can be useful to be able to exert a little bit of QAA leverage.

> We know from the learning developers that we've spoken to that they really like this chapters because it gives them something they can use against, umm, but wait for their institutions to say we're not talking complete rubbish, you should take some notice of what we're saying.

The most important use for the Chapter that the educational developers stated, however, was in providing external recognition and justification for their roles and the direction they are taking their work:

> I think it gives me a bit of licence, in a way (7)

> I think it offers them [educational developers] external endorsement of the things that they want to do, because if you think of the sort of people who often work in educational development, they are often, shall we say, touch with something of an evangelical zeal. They want to do these things, and somebody as powerful as the QAA saying 'these are the things that you should be doing', it's quite, it reinforces that (2)

The QAA chapter is not far removed from what I'm doing anyway, and will be used as a resource, and actually help when the staff that I'm reaching are more resistant, it gives another level of 'this is important, and will be important when we go through audit' (3)

I think for an educational development unit, or a body of educational developers in an institution, I think it's quite powerful stuff because it actually says these things that the institution should be doing, therefore it gives us a rationale for existing in the institution, which is something we have to argue for (8)

This justificatory use was also highlighted by the Advisory Group, where one member even suggested that the justification for the educational development function was an undisclosed rationale for some of the decisions that were made:

I think it helps to be able to point to an indicator, a government document that is, that says this is our job. This is not just me standing in the front of this room saying this is a good idea. We are held accountable. But I think it strengthens our authority. It gives a little weight behind us. Muscle behind us […] I think it strengthens, it strengthens our, I think the word was used from time to time, was used or implied but not actually said, was the job security of the people in the room who do educational development. The idea that we built in the importance of educational development into the Code. We were aware that we had an interest in doing so. And when it comes to tight budgetary times as we're facing now […] it helps us make the case within the institution for the importance of keeping the function.

One thing was clear for one interviewee, however, the Chapter was not being used enough:

Thinking about it, and having being forced to think about it, I don't think we use it enough. I don't think we make enough reference to it, I don't think we make ourselves aware of it (8)

Challenges posed by the Chapter

The interviewees noted a number of challenges that the Chapter might pose for their institutions and also their educational development practices.

Support and development for all

The most frequently cited challenge was around the continuous professional development (CPD) of all staff:

We really need to get out heads around CPD and it being an on-going journey [...] but delivering it, you have to look again at how people the day, academics, how people value CPD and then what resources you've got to support people (5)

While one interviewee felt that the terminology was sufficiently vague not to impact on current practice at all, others felt that offering CPD to certain groups of non-standard teachers would pose logistical and resource issues (5):

> I think there's a real challenge in trying to provide training and support for those that are not in control of their own teaching environment [...] the people like PhD students or technical support or other people pulled in for different reasons often do not get the same level of training and support – it might not be as big a chunk of their professional activities and therefore might not be as important for them to get that training and support, but the impact of that on the student experience, it does bother me (1).

In highlighting the need for support and development across the board, the educational developers outlined where institutions might struggle with particular groups. These include: collaborative partners, international staff, non-standard teachers, and all students.

Collaborative partners

The most frequently mentioned group of staff were those who worked for collaborative partners. Whether these are located overseas or within the UK, there were issues about ensuring that they were adequately trained and developed:

> We have a lot of partners, collaborative partners, at home and abroad, and it's dizzying because we have so many (4)

> QA [quality assurance] with your own staff is always quite challenging. QA of your own awards with someone else's staff is even more challenging (2)

> The one thing that I think from my own institution is the greatest challenge from within this document is that it covers all our academic programmes, and as an institution that has a growing overseas delivery, that is a huge challenge, and it's certainly an area that I feel we are not comfortable in meeting the expectations. I think organizing it so that within our own UK-based campuses we are doing what is expected of us is one thing, making sure that everybody put there, especially those who are secondary providers of our education or our programmes, and who we have agreements with, while I'm sure a lot of focus within the institution has been making sure we fit within the chapter on external agreements, I think the aspect of ensuring all the other chapters are adhered to is, I suspect, something that has not been given sufficient consideration (1)

> I think there's a real challenge for any institutional partnership working, and I don't think anywhere has really got it quite right, or is having a discussion about getting it quite right (10)

Interviewees noted that this development needed to be planned early into collaborative ventures and that resources needed to be isolated. Currently, educational development units are not set up to work with these staff (although some interviewees spoke of institutional initiatives that were being piloted and of rather *ad hoc* arrangements with staff members based overseas).

International staff

Other groups of staff were mentioned in a similar way. International staff, who were teaching within the UK, were highlighted as being challenging to support due to the sensitivities of assessing their level of English:

> Another area I see that is the TAs [Teaching Assistants] and postgraduate research students – you get first year PhD students brought in who have English language challenges, and while their English language is sufficient to converse in a lab on a day-to-day basis, it's not sufficient to stand in front of 50-60 undergraduates and teach them. There's a whole area there about trying to think a bit more imaginatively about the support we provide for members of the University in terms of wider provision of English language support (1)

> International staff who don't necessarily have English as their first language may not be able to be as clear as we would like them to be [...] It's one of those sort of taboo subjects that people find it difficult to talk about because these are academic stars, and that's why they're here, but their English severely affects their ability to communicate with their students, and so thinking through that is quite ... and how we support that and how we don't let members of staff down, so whether there should be something that more specifically acknowledges the fact that actually we have non-traditional students, but we have non-traditional staff as well, and we do we support those non-traditional staff, and we stop making it this secret in the corner, and we acknowledge the fact that we've got a real broad bunch of people (8)

It was not always clear who should be offering support to these staff; educational developers often did not have the skills or expertise to support English language development and more student-facing support was not always appropriate.

Non-standard teaching staff

Interviewees also identified the challenges of working with staff on part-time contracts, visiting lecturers, PhD students who teach and staff teaching on higher education programmes within further education colleges:

> It talks about appointment, support and continued professional development, but what about ... that's fine for full-time, permanent contracts, but what about associate lecturers, technicians ... so this is learning and teaching, but what about student support. And the lab assistants, the PhD

students who are running the seminars ... so, sort of, they don't seem to be ... the focus is on full-time academic staff and there's an issue because the student experience is delivered by many people (3)

Visiting lecturers. They do a lot of, I hate the word delivery, but they do a lot of day-to-day contact with students, but don't necessarily have any support or understanding of the bigger infrastructure in which they are working (10)

It was not just the staff who were perceived as difficult to support sufficiently, but also the students.

Supporting and developing 'every' student

Just as the requirement to offer development opportunities to all staff who support student learning, the Chapter also highlights that 'every' student should receive the support that they need.

The term 'student' or 'students' is used n=160 times within the chapter. This is used in preference to 'learner' or 'learners', which appears n=8 times. The Chapter protects the interests of all students and it spends time outlining who they define as students.

This focus on support for all students is strengthened by the use of the adjectives 'every' (n=23) and 'each' (n=1) and the pre-determiner 'all' (n=2). It is recognised that a responsibility to support 'every student' will require the promotion of equality and inclusivity and the Chapter has a strong section on 'equality, diversity and equal opportunity' (the Chapter, p.4), which relates to both staff and students. This section makes reference to: 'diverse requirements, entitlements and backgrounds', 'differing individual requirements', and 'parity in quality of learning opportunities' (the Chapter, p.4).

There is a strong message in the Chapter about the expectations of inclusive and equitable provision within a very diverse higher education sector. It is in relation to discussions of diversity, inclusion, and equality that students are mentioned most frequently. The Chapter is particularly clear that it is the higher education provider which needs to create an inclusive learning environment where students can succeed and that higher education providers will be proactive in providing for varied requirements. The learning environment may be the physical environment (real and virtual) or conditions for learning, where all students can prosper.

Members of the Advisory Group explained the process they went through to get the term 'every student', something that did take the group members 'a while to reach a resolution on':

We talked quite a bit about every student. The notion of every student was a phrase that, we had one woman on the committee who was particularly expert in diversity issues and she was quite vocal, very articulate, so that she was able to press the agenda without being annoying. A very good spokeswoman for diversity. And so some of the language that came out was very much informed by

her expertise in that area […] and that word 'every' appears in a number of places, and that was her contribution. I mean, we all agreed, but I think we wouldn't have gotten there without that expertise.

The focus on 'every' was something that some educational developer interviewees noted might be problematic; cited examples included students on collaborative programmes, research students, distance students, and students who are out on placement. While the interviewees recognised that a lot of support was already in place, they were not always convinced that 'every' student would have the same access to it. Support was inevitably uneven:

> I think it continues to be challenging when I see things like 'learning activities and associated resources provide every student with a need for an effective opportunity' [...] You know, I've never worked anywhere that wasn't incredibly uneven (5)

> A university is a very complex place, and there will be aspects of this which are being practiced very well, and really well in some departments and some schools, but there will be aspects of it which won't be in other schools and departments (7)

Lack of awareness and engagement with quality

A final area of challenge relates to staff attitude and engagement with quality. At a very basic level, staff simply may not be aware of the Code: 'I don't know how many will have commented on the Code, or even realised it's there' (3). For them, as one Advisory Group member remarked, the HEA's UKPSF might play a more prominent role on a day to day basis than the Code.

Equally, staff may be resistant to quality initiatives:

> There can be a knee-jerk reaction about quality enhancement, and you know, we don't like it, people telling us what to do (4)

> There really is a lot of cynicism around the university about these documents, and other practices as well – programme approval, annual programme evaluation and so on [...] How you communicate with staff, because they are, you know, they are fed up with this kind of thing, they are absolutely fed up with it (7)

Quality assurance documents are seen as inherently 'stick' documents: as soon as you mention QAA, people do see compliance (2) and something that can shut down innovation:

> There will be activities that staff do that fall outside of that specification and there's a danger then, that what they do might not be valued, because it doesn't fall within that specification. And that's the flipside of transparency [...] There's definitely a tension there because the more you aim for transparency and consistency, the price that you pay for that is that the innovation becomes more of

a fringe activity. Even if it isn't prohibited, it becomes something that attention isn't focussed on, that doesn't get the same resource (2).

The same issue was recognised by an Advisory Group member:

> I think by the nature of this in QAA, it will probably deter from innovation and creativity and lean more towards quality assurance and systems. It's that tension about whether it ignites enhancement or just reinforces assurance.

The challenge, then, is to make it 'living, you know, breathing' (4) and not just something that engenders superficial engagement:

> Of course a big problem with the whole QAA agenda is that once you set it to task, people give the appearance of doing it, and giving the appearance of doing it takes their time. So, rather than genuinely engaging with the best educational experience they can provide, they put an awful lot of energy into the appearance of it (5).

Even when staff do authentically engage with policy, there are often so many other competing demands that they face. One interviewee also highlighted that the QAA does not operate within a policy vacuum and that there will always be other policy drivers that impact on (and might well conflict with) the Chapter.

Conflicting and competing demands

The Chapter and the Code more broadly have to compete against other policies and drivers. The interviewees set out some of these: KISS statements (3, 5); REF, Horizon 2020, Vitae (1, 3); NMC (4); CRB, OFSTED (2); Welcome Trust and Royal Society (1); OFFA, HESA, NSS and DLHE (5,3, 6, 7); Professional Bodies (2, 9); HEA (1,2, 3, 4, 5, 8, 10); NUS (10); HEFCE, SFC and Enhancement Themes (7, 6) and Equality legislation (5, 10). The Code does not operate in a vacuum and universities are always 'playing catch up with policy' (2), resulting in:

> Doing that kind of plate spinning thing, you know, where you get one of them going and go off and spin other plates, and then by the time you've done that, the first one's slowing down again (2).

> Your staff have all only got so much capacity, so if you push on assessment, or whatever, or you push on research teaching linkages, you know, that stretches, either a particular bunch of staff, or staff in a particular way and, you know, it may put tension on this bit, which is something else, which has to go in the background (6)

These competing policy drivers result in a university environment which is in a state of continual flux, where institutions happily follow current fashions with little reflexivity of appreciation of history. This can leave staff tired:

> Institutions don't have a memory in the sense that the leadership changes [...] there's no sort of collective memory and so often I find things that have been implemented this time round that weren't terribly successful last time round (2).

> Policy fatigue. There's fatigue and that's obvious [...] There's definitely fatigue, very, very strong. Because an awful lot of people have been here a lot longer than those at the top of the organisation, they've seen it before, but in different words, and they are tired with it. They are very very tired with it (7)

> Thing are often implemented without planning out that evaluation, then by the time you've worked out that there is something that needs tweaking there, you've committed yourself to something else (2)

In an environment of policy initiative overload, the QAA is competing against many other drivers. The success of the Chapter and the Code more generally rests, in part, on the perceived power and influence of the QAA.

Power, influence and the QAA

The educational developers remarked that UK higher education was still divided. Newer universities (e.g. post-1992) were likely to have a different focus to older universities (e.g. Russell Group). Positioning within the sector was deemed to reflect engagement with the QAA and its Quality Code. The more powerful the institution, the less likely they are to engage in a meaningful way:

> But it's often those organisations who you think are battling against the odds who seem to do better ... it's the big organisations and the ones that are ... but that's because you can tell the ones that pay lip service to it and those who really believe it ... you know, that authenticity (4).

> I mean certainly institutions like mine would just go 'fine'. They've already made that kind of threat before, that they'll do that. Their brand is big enough (9)

The power of the QAA was questioned in general. The decreasing power of the Higher Education Funding Council for England (HEFCE) in shaping learning and teaching, given the reduction in the teaching grant to institutions, was mentioned. This, they felt, was likely to impact on the power of the QAA:

> Given that the burden of fees is shifting to students from HEFCE, then the influence of QAA, to some extent, certainly financially, might be decreased because the income that is coming through block

grants is decreasing, as more of it is coming directly from the students, so at one point, perhaps, in the past, where QAA controlled all of your income stream [...] I'm not saying it isn't powerful because clearly it is influential, but in real terms, we know the pragmatics of this and many students won't read QAA reports (2).

As there was a perceived decrease in the power of the QAA, one interviewee raised the issue of competition between the QAA and the HEA, and where this might lead quality assurance in the future:

I think some people were perhaps a little funny about the lines between the HEA and the QAA because I think QAA, people perceive QAA should just be writing policy and not good practice, and that's the HEA domain [...] I mean the HEA and the QAA both have different funding streams, they are obviously competing to a degree, but also need to work together. So I understand where that slight challenge might come from, but I think these codes have helped up understand what is meant by enhancement. And it takes us nearer to the Scottish model of quality assurance and enhancement, which is a good thing (10)

Members of the Advisory Group also discussed the relationship between the QAA and the HEA:

QAA and the Academy have an uneasy relationship, we would say, not in, like as organisations we work extremely well together, but the sector struggles to see where one finishes and the other doesn't

We were very keen to make clear to everyone the HEA's role […] we're very clear, you know, we're about quality and standards, we're not about pedagogy. The Quality Code is not about pedagogy. But obviously, the two meet at some point in a kind of grey area, I suppose.

There was a feeling that this Chapter had been written so as not to upset anyone, given the QAA's precarious position:

They're [QAA] not willing to upset anyone, And I think that the tenuousness of their funding is causing them to have that [...] They're worried about how they are going to survive if they are not liked [...] The QAA is doing itself a disservice, a fundamental one and it's not rising to it and it feels subservient to the sector (9)

The same interviewee showed their frustration that the QAA 'had missed a trick' and that in the post-REF window, universities might be more willing to devote time to learning and teaching but that the QAA, in this Chapter, had not made calls for learning and teaching enhancement strong enough.

This viewpoint was shared by a number of other (Advisory Group and Educational Developer) interviewees who questioned the impact that it would have on the sector:

> I don't think it will have much of an impact […] I do not expect it to have a profound impact on the nature of the learning experience of students.

> It's quite an infuriating document. The more I think about it, it's er, this is the next five years then, yeah, nothing is going to change. That's five years of having the same conversations, and the same limitations, and the same frustrations (9)

> It didn't strike me as being a particularly revolutionary document (2)

The Chapter poses a number of challenges for institutions in terms of its implementation. It is, however, perhaps engagement with quality generally, awareness of the Code specifically, and the perceived power of the QAA that will impact most greatly on the extent to which learning and teaching is authentically improved by this policy. Given educational developers focus on learning and teaching, this is likely to have repercussions (potentially positive and negative) for them. These are discussed below in the concluding remarks.

Concluding remarks

The Chapter is a document of its time; it reflects the current UK learning and teaching context. The development process, with expertise from diverse Advisory Group members and open consultation events, appeared to work well and was commended by those who took part in the process. The Advisory Group interviews provided insight into the development process and highlighted the challenges that the group members faced in crafting a policy that would be applicable across a diverse higher education sector. While there was debate and discussion about the specifics of language, definitions, and the boundaries of the Chapter, there was generally overall agreement about the actual content of the Chapter and its expectations of the sector. There is little in the Chapter that is unexpected; it is a safe document. Indeed, the educational developers' perception of the Chapter was that most of the Indicators were already being carried out in most higher education providers. Although some challenges for implementation were identified, they reflected, for the most part, issues of scale and coverage rather than an absence of provision. The Chapter is, then, unlikely to impact significantly on learning and teaching practices, but equally it is not likely to upset anyone greatly.

Given the criticism the QAA has received over recent years (Macleod 2001; Brown & Alderman 2008; BBC 2010), the perceived diminishing power of HEFCE, and by extension the QAA, and the ambiguity

regarding the difference between the QAA and the HEA (Filippakou & Tapper 2008), it is perhaps not surprising that the QAA chose, at this time, to develop a Chapter that the higher education sector could not easily argue against. The subtle use of tenses within the Chapter itself reinforces this message as the QAA is very clear that this Chapter has been written for and by the higher education sector. The Expectation and the Indicators of Sound Practice are expressed in the present tense; they are statements of fact about learning and teaching practice that, being sector-driven, are indisputable. Gone are the modal verbs that express requirement and obligation, the tone has shifted to one of collective responsibility for ensuring a quality higher education experience across the sector. These shifts reflect broader movements in approaches to quality assurance, whereby earlier regulatory, accountability-focussed approaches are replaced by more collegial, enhancement-led mechanisms (Singh 2010).

In terms of educational developers and their relationship with this Chapter, the textual analysis of the Chapter shows that it is clearly a document that speaks to them. Its keywords support its learning and teaching focus and the inclusion of reference to scholarship, reflection, and continuing professional development reflect the work of many educational developers. The emphasis on enhancement over assurance situates the Chapter within the developers' natural sphere of influence. Indeed, Advisory Group members even suggested that there had been a, albeit not openly discussed, decision to write the educational development function into the Chapter by the educational developers who sat on the Advisory Board.

The educational developers who were interviewed for this study were, in the main, comfortable with the Chapter and with the direction it was suggesting for learning and teaching. The Chapter spoke to them in a language that they understood and they could feel the influence of the educational developers who were part of the Chapter's development advisory group. The textual analysis also showed, however, that this document was not written explicitly for them; as a body, educational developers are not mentioned at all. They are conspicuous in their absence. As CDA reminds us that what is absent or suppressed within a text is as important as what is there (Machin & Mayr 2012, p.38). Given that this Chapter is clearly of relevance for the educational development community, and was written (at least in part) by its own members, it is worth considering why educational developers were lexically absent.

It could be that the Advisory Group members realised that to make explicit reference to educational development work within quality assurance documentation would not help educational developers in their work with frontline academics as staff perceptions of quality are still overwhelmingly negative (Newton 2000; Cartwright 2007). Educational developers' institutional positioning is

already uncomfortable (see for example: Clegg 2009; Manathunga 2007; Green & Little 2013); and these troubles of positioning were re-expressed in the educational developer interviews conducted for this study. To connect educational development work so clearly with the practice of quality assurance could hamper rather than help developers in their day-to-day activities (Land 2004); educational developers often actively distance themselves from quality assurance work and from senior management more generally, emphasising their enhancement function and thus avoiding being perceived as 'a tool of oppressive, and ignorant, management' (Gibbs 2013, p.12). Instead, the relationship between educational development and quality assurance is implied within the Chapter, educational developers are unnamed and their work in terms of staff development is flexibly framed. For some of the educational developers interviewed, their absence from the policy text was unproblematic. They could see where their presence was inferred and wrote themselves back into the text, enjoying the freedom and flexibility that being unnamed offered. For others, however, a lack of explicit mention left them feeling vulnerable, unsupported, undervalued and often underutilised.

The educational developer's role in relation to policy is to translate and often make more palatable the policy messages that senior management want to implement, to use Manthunga's terminology functioning as 'university management's learning and teaching foot soldiers' (2007, p.26). When faced with resistance, the Chapter is often used as a screen to protect the educational developers from the backlash of academic staff who are faced with yet another initiative, the external driver that removes the responsibility of introducing unpopular change from their shoulders. The developers did not reflect, in these interviews, on their own position with regards to the changes they were pushing forwards, but it was clear that the Chapter offered them much needed external recognition, clout and influence. While educational developers were often tasked by senior management to implement aspects of learning and teaching policy, their role in the development of institutional policy emanating from national policy and the associated quality processes and procedures was more tenuous and a source of frustration for some developers. There was a sense that educational developer expertise was not being harnessed with regards to policy. There were accounts of the use of soft educational development influence through corridor conversations and email exchanges with senior management, but examples of strategic, planned involvement in the development of institutional learning and teaching policy, implementation plans and on-going evaluation were much less frequent. There was one notable exception where educational developers and quality assurance staff worked together to develop a student experience strategy under the leadership of a senior manager responsible for the Student Experience. So, as Debowski (2014) notes, educational developers are critical in facilitating the translation of national policy

intentions into practice, but they can only do this with the help of a strong sponsor as developers themselves do not wield sufficient power to bring about institution-wide change.

The educational developer interviews show, overwhelmingly, that the Chapter's primary use is justificatory. The Chapter helps them to justify their expertise in learning and teaching through the mapping of their own practice against its Indicators and they use the Chapter when they feel that it will be to their own benefit. The Chapter enables the developers to legitimise areas of work and the educational development function more generally by providing external recognition, rationale and licence. The Chapter also provides educational developers with a reason to pursue new areas of work that fall within the educational developer's remit but had not been resourced and provided an external impetus for channelling monies towards educational development practice. The Chapter offered a seemingly necessary institutional rationale for their role.

The findings from this study show that while the Chapter reflects the prevailing learning and teaching culture within the UK and that the educational developers interviewed in this study were relatively comfortable with the policy messages that it contained, the Chapter was most frequently seen as a means of justifying their role, their practice and providing job security for people who are 'watching their backs and wondering how others perceive them, and how they will continue to work in higher education' (Bath & Smith 2004, p.10). This is perhaps unavoidable in a discipline that is still trying to assert and establish itself (Shay 2012). These educational developers could not be described as policy driven, though many of them recognised that they could and should have more input and influence in learning and teaching policy development and the quality processes that flow from them. They clearly have the expertise to make valuable contributions in this area.

This research project sought to explore the extent to which educational development practice shapes and is shaped by higher education policy. The findings show, inevitably, a complex interplay of contributing factors. It is clear that the educational development community, through their involvement in the Advisory Groups and within consultation events, did shape the Chapter and that they were able to write into the policy the educational development function, something the educational developers themselves recognised. The resulting Chapter, however, is primarily a reflection of current learning and teaching practices. Rather than shaping future educational development practice, the Chapter will help to sustain it. This, it seems, is necessary for a field that succumbs to frequent re-structuring and re-organising (Gosling 2008) and remains vulnerable to the 'vagaries of strategic managers' (Clegg 2009,p.408). When policy has a merely justificatory role in practice, however, it is hard to see how engagement with it will open up new opportunities and areas for educational development work.

In order to truly shape educational development practice, educational developers need to be bolder in their relationship with policy and take a more prominent role in not only the interpretation of policy, but also its development, implementation and evaluation. It is perhaps the time to take up Lee and McWilliam's call to imagine 'a new leaderly disposition in the field' and to be 'players' rather than 'pawns' in the 'higher education board game' (Lee & McWilliam 2008, p.75). As this study has shown through its use of CDA, engagement with policy means an inevitable engagement with language and the constitutive power of written text. Educational developers have long recognised the impact of linguistics on higher education practice (see, for example: Smith 2008; Smith 2010; Wareing 2004; Mautner 2005) and now need to ensure within the texts they themselves produce, the language is not a barrier to engagement (Green 2010). Educational developers need to be 'players' in the re-interpretation of the term 'quality', playing their own role in the movement form quality assurance to quality enhancement and ensuring that the quality enhancement does not 'become little more than a new model of quality assurance simply camouflaged by a different descriptive label' (Filippakou & Tapper 2008, p.93).

A partnership model of educational development (Debowski 2014), where development and quality are more closely associated in what Gosling and D'Andrea (2001) call 'quality development', could be the means by which educational developers can influence learning and teaching policy; such a model worked particularly well for one of the educational developers in this study. Through collaboration with quality assurance colleagues, senior management, and other academics on policies, procedures and practices, educational developers will be able to draw on their expertise in learning and teaching to enhance academic practice but also shape quality assurance procedures, which are becoming more enhancement led, and more naturally within the scope of educational development, as quality systems mature (Harvey & Newton 2007).

Reflections on the research project

I found this a fascinating study to undertake and I thank SEDA for making this possible. The funding that I received meant that I was able to carry out an in-depth study into an area of my own practice, within my own community, using a research methodology which I wanted to explore and develop further. Without SEDA's support, this research would not have been done.

I was heartened by the response I received to calls for participation in the project. Both the Advisory Group and the Educational Developers were keen to engage in the study. It is worth noting, however, that a number of the educational developers I interviewed admitted that they had not read the Chapter until they knew that they were to be interviewed. During their interviews, these developers were able to recognise how they could use the Chapter to the benefit of their own

practice. The research project itself, then, might well have shaped educational development practices.

While the project is obviously limited by its size (fifteen interviews and one single policy), the data collection methods used resulted in very rich data and that richness is reflected in this report. I feel that there is still potential for further analysis and for follow-up discussion papers and research articles.

This project would also benefit from further on-going research. At the time of the interviews, the Chapter was still relatively new. It would be insightful to carry out follow-on research to see how the Chapter was actually being used in educational development practice (rather than some of the imagined uses that were proposed).

I found the Advisory Group member interviews particularly useful and interesting to conduct. They allowed me to see first-hand the challenges that policy development poses. Although I have been involved in the development of policy at institutional level and have also written about some of those experiences (e.g. Clegg & Smith 2010), it is sometimes too easy to see a policy just as a piece of dead text and not to see the debates, discussions, and disagreements that went into its development. In the same vein, the educational developer interviews gave insight into how those words were interpreted into action through educational developer activity.

Finally, the project allowed me experiment with some data curation and reference management tools. The ScoopIt site that I set up collated together internet sources related to my search terms of educational development and higher education policy. The site looks nice, but I did find it difficult to find websites that related specifically to this topic. It is perhaps too specialised. ScoopIt works best when it relates to a broader topic area, where more content is available online, for example Learning and Teaching. The Mendeley Group I found more useful. Mendeley is the reference management system that I use anyway and it was not extra work for me to copy relevant articles to this group. When I was notified of new members to this Group, it inspired me to seek out further references and maintain the list.

Recommendations following this study

This study raises a number of recommendations. Firstly for educational developers:

- Educational developers should seek to engage with policy development at a national level. This study has shown that the educational development community has a strong role to play and can exert influence nationally.

- Within their own institutions, educational developers should be more confident in their learning and teaching expertise and should ensure that they share their experience in the relevant fora. This may well involve seeking out collaborations with quality colleagues and being bolder in their involvement in policy development and implementation.

- Educational developers should not be afraid of using national policy to justify areas of their work they wish to champion; this approach worked for the developers interviewed here.

- As an educational developer myself, I have benefitted from the in-depth understanding of the development and implementation of the Chapter. Educational developers should seek to continually engage more critically with learning and teaching policy and procedures in order to better understand them, and change them if necessary.

For the QAA:

- The Advisory Group and Consultation model works well during the development phase and it increased awareness of the Chapter and its rationale. The QAA should also explore ways to understand how the Chapter is interpreted and used. A policy is a living document and should be part of an on-going discussion.

- The QAA should continue to seek out ways to enhance engagement and awareness of the Chapter. The QAA's website (with podcasts, interviews, reports, etc.) helps, as does the development approach. The QAA should also consider the influence of external research; some of the developers would not have read the Chapter had they not been a participant in a research project. Involvement in the research gave them the opportunity to reflect on how they could use the Chapter in their own practice.

In terms of the research approach:

- With its focus on a text, its development, its interpretation and the socio-cultural conditions that impact on former, CDA offers a comprehensive approach for researching contemporary higher education policy and practice. More higher education research should investigate the benefits of CDA for their work.

- There is, however, a sense that you cannot really understand how a policy text is used without some kind of ethnographic study. This research highlights the need for more in-depth, longitudinal and ethnographic studies (such as Newton 2003).

And finally for SEDA:

- SEDA should consider offering more of these larger grants. While it is clear that small amounts of funding can impact positively on practice (Smith 2012), the larger grants allow for more in-depth research and open up a funding source for educational developers that is simply just not there for them due to their often non-academic status.

Dissemination and plans for future work

I took the project to the International Consortium of Educational Developers Conference in Stockholm, Sweden in June 2014. A copy of my slides can be found in Appendix 1. The paper, which looked specifically on educational developer identity and their educational developers' relationship with policy, was well attended and received good feedback and comments. I intend to develop this conference paper into an academic article and submit to the *International Journal for Academic Development*.

I also want to develop a second article that draws together the textual, processing and social analysis, by focussing specifically on one key phrase or word such as 'appropriately qualified', 'every student', or 'partnership'. I believe this kind of work would highlight the complexity of both policy development and its subsequent interpretation and implementation. This article I would seek to publish in a journal such as: *Higher Education* or *Discourse: Studies in Cultural Politics in Education*.

It may be possible to also develop a third article which focusses on the research method that has been adopted here, namely CDA. As noted above, CDA is burgeoning method in higher education research (see: Smith 2013), but little attempts to analyse all dimensions of discourse (i.e. text, the process of production, the process of interpretation, and sociocultural practice). This project is relatively unique in this regard. A potential outlet might be the *International Journal of Research and Method in Education*.

During the project, I participated in a Future Learn MOOC on *Corpus Linguistics: Method, Analysis, Interpretation* from the University of Lancaster. This MOOC highlighted to me the potential power of corpus linguistics for CDA. I feel that further analysis could be done on the text of the Chapter and the Code more generally using concordances, collocates and keyness (Baker 2006). This an approach to analysis I intend to explore further.

I have not yet presented this work at a SEDA conference. I feel that I would be able to write a paper from this research that would meet the theme of the 2015 Spring Conference: *Internationalising the Curriculum: What does this mean? How can we achieve it?* This research drew to the fore the challenge of supporting staff from collaborative partnership, and this is an area I could propose for a paper.

Finally, I intend to maintain the Mendeley Group*: Higher Education Policy and the Shaping of Educational Development Practice*. This group now has a small number of members and followers (mostly doctoral students) and I have found this a useful way of collecting references.

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