

*Quality Assurance of Higher Education in the
UK: Regulatory Change and Market
Competition – the Case of Law*

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***Mantenimiento de la Calidad de la Educación Superior
en el Reino Unido: Cambio de Regulación y
Competencia de Mercado - el caso del Derecho***

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Abstract

Quality Assurance of UK Higher Education, the wider regulation of the sector and of those who teach and research within it has experienced significant change within recent years. The scale of these changes looks set to intensify as the Higher Education and Research Bill makes its way through Parliament. Core themes under-pinning these changes are a Government desire to generate further competition within the sector through the arrival of new providers alongside more detailed sets of information to inform consumer (student) choice. Similar challenges can be witnessed within the legal

education sector as one of the key regulators of the legal profession is currently consulting on far-reaching reforms, designed to diversify the routes towards professional qualification. Although the UK does not have a state certification process for academic staff, increasing attention has been brought to bear on institutions to demonstrate that their staff hold teaching qualifications. Quality assurance activities and processes have taken an increasingly central place within the UK HE landscape over the last 25 years or so. However, the future balance between highly developed quality assurance mechanisms, state-regulation and a competitive open market appears uncertain. Law exemplifies many of the challenges facing the sector as a whole.

1. Introduction

Quality Assurance of UK Higher Education, the wider regulation of the sector and of those who teach and research within it has experienced significant change within recent years. The scale of these changes looks set to intensify as the Higher Education and Research Bill makes its way through Parliament. Core themes under-pinning these changes are a Government desire to generate further competition within the sector through the arrival of new providers alongside more detailed sets of information to inform consumer (student) choice. Risk-based Regulation is also central to the proposed new framework. Similar challenges can be witnessed within the legal education sector as one of the key regulators of the legal profession is currently consulting on far-reaching reforms, designed to diversify the routes towards professional qualification. Throughout all of this, the Quality Assurance Agency has presided over an increased recognition of the importance of enhancing and assuring the quality of higher education within the UK, with increased responsibility placed upon individual institutions to assure quality. Although the UK does not have a state certification process for academic staff, increasing attention has been brought to bear on institutions to demonstrate that their staff hold teaching qualifications (alongside traditional academic credentials of higher degrees in their subject areas). University promotion criteria, however, remain subject to individual institutional policies, albeit with benchmarking through the use of external assessors and referees. Quality assurance activities and processes have taken an increasingly central place within the UK HE landscape over the last 25 years or so. However, the future balance between highly developed quality assurance mechanisms, state-regulation and a competitive open market appears uncertain. Law exemplifies many of the challenges facing the sector as a whole.

PART A: The Higher Education Landscape in UK¹

1. Assessing the Quality of Institutions and their Degrees

a) Existing Arrangement and the Role of the QAA

In 1991 the Government's White Paper on *Higher Education: a new framework* heralded a period of substantial change in the University sector including the assessment of the quality of such institutions and the degrees they awarded. The major plank of the reforms that followed the White Paper was the removal of the binary distinction between universities and polytechnics (subsequently known as 'new' universities or post '92 universities). Arguably a natural result of this change was to bring quality as-

¹ The primary focus of this paper is on England, given the different arrangements under the devolved administrations.

insurance mechanisms within an overarching single scheme.² Following a somewhat protracted period of discussion the Quality Assurance Agency (QAA) came about in mid-1997 (Dearing, 1997). Further deliberations meant that the QAA's review process was not fully rolled out in England and Wales until 2003. By 2009, a Parliamentary Report suggested that views were somewhat mixed as to its efficacy. In evidence to the Select Committee reporting on 'Students and Universities' it was commented that: the "QAA [...] should be refocused to concentrate squarely on standards. At the moment it concentrates on process. It is possible to come out of the QAA with a glowing report but in fact have poor standards" (House of Commons, 2009: para 210). In further evidence an academic said that in her experience the QAA was "another bureaucratic, administrative burden that you learn to play the game of" and that "You do it very well, you show the processes are there, but it does not actually command the respect of the academics delivering the teaching on the ground".(ibid). The Committee agreed and urged reform.

The subsequent Browne Report (2010), the catalyst for the introduction of considerably higher tuition fees, brought about a new review process and the development of a Quality Code against which the QAA would assess institutions. Furthermore, private colleges would become subject to QAA review and accreditation in order to maintain 'Tier 4 status' – effectively the ability to recruit international students. Nonetheless, concerns still remained about the QAA's processes which remained focussed upon threshold standards rather than quality above that threshold (House of Lords, 2012: para. 131-132). More risk based regulation was seen as the way forward – a lighter touch review for established institutions compared to new providers.

The process

The QAA, independent of the Government and HE sector, seeks to assure the quality and academic standards of higher education institutions in the UK through a system of external review (the Higher Education Review), whilst further recognising good practice and seeking continuous improvement. The UK Quality Code for Higher Education, a code of key expectations and minimum benchmarks (QAA, 2015: 6) that HE institutions are required to meet, is used by the QAA to assure quality. Its stated purpose is to:

- Safeguard the academic standards of UK higher education
- Assure the academic quality of learning opportunities that UK higher education offers
- Promote continuous and systematic improvement in UK higher education
- Ensure that information about UK higher education is fit for purpose, accessible and trustworthy (QAA, 2015: 2).

A review of an institution is carried out by a number of peer reviewers including students who are full members of review teams. The review takes place in two stages.

² For an analysis of this period (Brown, 2004).

The first stage is a desk-based analysis of information provided by the institution, including a self-evaluation document. Students from the institution being reviewed can also participate in the process by making their own submission and meeting the review team. In submitting material for the desk based review relevant national datasets (e.g. www.unistats.com) may inform the submission.

The second stage of the review is a visit to the institution. This provides the opportunity for the review team to meet with students and staff and other relevant players. The duration and scope of the visit is largely determined by the conclusions reached as a result of the desk based exercise. This risk based approach seeks to reflect the *Principles of Better Regulation of Higher Education in the UK* (Better Regulation of Higher Education Group, 2011: p.13, para. 4). The review team will also identify good practice and make recommendations for action where appropriate.

The review process has a core element which applies equally to all institutions and a thematic element. The core focuses on academic standards, quality of learning opportunities, information and enhancement. The thematic element will change depending upon whether a particular area is worthy of specific attention. This might be because of the particular provider or whether the area has been regarded as one requiring further scrutiny more widely within the sector.

Although the QAA does not normally review individual subjects it does produce subject benchmark statements outlining agreed expectations of what a graduate in a particular area ought to know, understand and do on completion of their studies.³ The benchmark statements take into account professional requirements where appropriate and are drawn up by subject specialists and reviewed periodically. Although the role of the benchmark statement might be questioned as a mechanism for assessing quality (Breakey, 2012), they assist in the design, delivery and review of programmes. They provide an element of transparency as to what ought to be achieved. As such, they can be a valuable tool for the plethora of quality assurance mechanisms now operating internally, within institutions, through to individual subject level quality assurance processes. Further, they operate as a signal to external partners that a particular programme may satisfy professional requirements without the need for further review, or removes the need for the full weight of review.

If an institution has experienced two successful reviews (including the last one) then the interval between reviews will be six years. When this is not the case the period is likely to be four years. If the report establishes that the institution 'does not meet UK expectations', or if sufficient progress is not made in dealing with required improvements then an action plan outlining how the improvements will address the specific areas questioned will be necessary. The plan should also address how the internal quality assurance process will be strengthened to identify such problems and address them in future.

³ For the Law Benchmark Statement, see: <http://www.qaa.ac.uk/en/Publications/Documents/SBS-Law-15.pdf>

Threshold academic standards define the minimum standards which institutions must use to award qualifications at a particular level of the relevant framework for higher education qualifications (FHEQ). This national qualifications framework also provides a signal that the quality assurance processes are robust enough to ensure comparability and compatibility of qualifications between the UK and other European states (the 'Bologna' countries) thus easing the movement of students and staff. The so called Bologna Process in higher education is recognised as a 'technical exercise' (QAA, 2010: 3) but has wide ranging practical impact. Individual degree-awarding bodies are responsible for ensuring that UK threshold academic standards are met in their awards by aligning programme learning outcomes with the relevant qualification descriptors in the national frameworks for higher education qualifications.

Fundamentally, academic quality is concerned with how well the learning opportunities made available to students enable them to achieve their award. It is about making sure that appropriate and effective teaching, support, assessment and learning resources are provided for them. However, academic quality is not the only imperative with higher education regulation. Proposed changes to the Quality Assurance arrangements within the UK need to be located within a broader understanding of the Government's policy objectives for the sector.

b) Higher Education and Research Bill and the Changing Regulatory Landscape

The UK Government set out its plans for a major overhaul of the higher education regulatory landscape in its White Paper (BiS, 2016a), published in May 2016 and set out in detail in the Higher Education and Research Bill. Underpinning the Government's approach is a belief that in "introducing more competition and informed choice into higher education, we will deliver better outcomes and value for students, employers and the taxpayers who underwrite the system" (BiS, 2016:8).

Key Proposals

The Government intends to generate greater competition, through making it easier for new entrants to enter the marketplace, assume degree award making powers and university titles, more quickly than previously. Regulatory simplification is also proposed through the establishment of a new Office for Students to replace a number of existing bodies. In order to assist students in understanding more about their different options for study, a Teaching Excellence Framework (TEF) will be established – and universities' performance within the TEF, will be linked to the ability of institutions to charge higher fee levels. The Research Funding Councils will also now fall within the oversight of a single UK Funding Council. Concerns about the potential separation between research and teaching (and the emphasis upon teaching and student choice within the White Paper) have been exacerbated by a re-structure of Government departments following the appointment of the new Prime Minister, Theresa May in summer 2016. Research policy remains with the Department for Business, and universities' student-focused activities fall within the realms of an expanded Department for Education (UUK, 2016). Full details of the proposals can be found in the White Paper, the Bill itself and associated technical briefings

[<https://www.gov.uk/government/collections/higher-education-and-research-bill#business-cases>]. The key provisions are discussed below.

Risk Based Regulation and New Providers

Under the proposed new regime, the new Office for Students will assume all regulatory powers in relation to teaching related activities within Higher Education (clause 1 of the Bill). The central ambition is to “to replace the current burdensome and fragmented system with a single route to entry, providing a single simpler, clearer way to become a higher education provider” (BIS, 2016a: 24). Although a maintenance of the existing co-regulatory approach has been emphasised (Department for Education, 2016a: 6), the wide-ranging nature of these powers has been criticised by Universities UK (UUK, 2016). In broad terms, the powers include establishing and maintaining ‘baseline regulatory conditions’, ‘post-probation and established provider assurances’, ‘degree-award making powers’, ‘university title’ and, with a range of stakeholders including a Quality Body, sector and student representatives, ‘Governance of baseline quality and standards requirements’, with reference to the expectations of Quality Code and Frameworks for Higher Education Qualifications.’

In order to encourage new entrants to the market, the Bill proposes a series of different tiers of status within HE market. Thus, in the first instance, potential providers seeking to be able access student loans to support potential students⁴ would need to demonstrate that they:

- “Deliver courses that are determined as being higher education, by complying with the Framework for Higher Education Qualifications in England, Wales and Northern Ireland (**FHEQ**)
- Subscribe to the Office of the Independent Adjudicator complaints mechanism (**OIA**);
- Be compliant with Competition and Markets Authority (CMA) consumer law advice for higher education providers;
- Pass an **Entry Review test** and satisfy the Office For Students (OfS) that it meets the following: o existing financial sustainability, management and governance requirements (**FSMG**);
- Existing quality requirements, informed by a visit from the designated quality body (currently QAA), to test against the **expectations of the Quality Code** (e.g. experience of teaching staff, appropriateness of curriculum, mechanisms to assure quality etc).
- Have in place an **Access and Participation Agreement** before it can charge higher fees above the basic amount of up to £6,000, and up to the maximum amount currently up to £9,000.” (Department for Education, 2016b: 1-2)

⁴ This effectively brings them into the realm of public funding and thus state regulation.

For institutions wishing to award their own degrees, the Government envisages that the system will continue to operate broadly as present, with a three year probationary period to assess that not only can the provider continue to meet the conditions required to access student loans, but can additionally meet the standards of higher education without the support of an established provider. It is envisaged that University Title can be awarded after a successful probationary period with degree award making powers and a number of other metrics, including, for example, at least 55% of the students studying undergraduate degrees.

Quality Assurance, Information and Student Choice

As indicated above, ongoing quality assurance will be a key feature of the functions of the new Office for Students (OfS). In relation to this it will be supported by the establishment of a Quality Assessment Committee (clause 24) which will provide the OfS with advice as to its functions in relation to assessment of, the quality of, and the standards applied to, higher education (cl. 23). Operationally, the OfS will appoint a designated Quality Body, which will be responsible for discharging the two key elements of the quality assessment framework “a) regular and routine monitoring through Annual Provider Review and (b) in-depth review visits where these are considered necessary.” (Department for Education, 2016a: 14). Some of the key indicators in these annual assessments will include: “a. Overall student numbers and, in particular, unplanned or unmanaged over- and under-recruitment patterns, b. Student entry requirements/UCAS tariff data, c. Non-progression and non-completion rates, d. National Student Survey results, e. Number, nature and pattern of student complaints to the OIA, f. Degree and other HE outcomes, including differential outcomes for students with different characteristics, or where there is an unexpected and/or unexplained increase in the number of firsts and 2:1s awarded, g. Graduate employment and, in particular, progression to professional jobs and postgraduate study, h. TEF scores” (Department for Education, 2016a: 15).

The Teaching Excellence Framework (TEF) has been presented as a means by which to re-focus attention on the importance of learning and teaching matters, and in particular on the student experience within a sector within which performance in the Research Excellence Framework (REF) is a significant driver of university strategy and academics’ career planning. However, it has attracted criticism from student bodies (Packham and Jacobs, 2016) because of current plans to link TEF performance with increases in student fees, and scepticism that it will achieve the desired results in terms of research and teaching priorities within institutions (Blackmore, Blackwell and Edmondson, 2016).

In the first year of the operation of TEF (for students commencing their studies in 2017), providers that meet the baseline quality standards will receive ‘meets expectations’ award and will be able to increase their undergraduate fee levels in line with inflation. This will see fees for the vast majority of undergraduate degree programmes increase from £9000 to £9250 p.a. In the second year of TEF, assessments will be made

by review panels including students and academics looking at key criteria across Quality of Learning, Environment and Outcomes. Metrics that may be drawn upon are likely to include National Student Survey results; retention rates of students, and student destinations, including graduate employability. It is envisaged by the Government that the rigour and detail required in TEF assessments will increase over the years, potentially including elements of subject level review (DeE, 2016b), and elements of teaching contact hours and teaching intensity (BIS, 2016a: 44). It is anticipated that there will be three award levels ('meets expectations', 'excellent' and 'outstanding'), but the financial benefit will not vary according to award level. While the Government set out its desire that TEF results would generate reputational as well as financial benefits to institutions, doubts have been raised about the extent to which this is possible in its current shape (Blackmore, Blackwell and Edmondson, 2016).

2. Assessing and Accrediting the Quality of Individual Academics

The UK does not currently operate a formal national framework to ensure the assessment and accreditation of the competence of those who teach and research in its public universities. Thus at the moment, "the proportion of staff holding a teaching qualification in 2013-14 is 38.07 per cent" (HEFCE, July 2015). However, as part of the proposals outlined above, it is envisaged that "quantitative information relating to the qualification, experience and contractual basis of staff who teach" (BIS, 2016b: 30) may be offered by an institution in its contextual submission for its TEF assessment. As part of this shift towards greater recognition of the importance of teaching qualifications as part of the quality assurance of its teaching delivery, universities have been collecting data on the numbers of its staff who hold teaching qualifications as part of their reporting to the Higher Education Statistics Agency (HESA). At the University of Leeds, for example, all new members of staff are required to hold or undertake a teaching qualification.⁵

The Higher Education Academy is "the national body which champions teaching quality in the sector" (www.hea.ac.uk). As part of its aims to increase the quality of those undertaking teaching and learning within Higher Education it has established a qualification [framework](#) of Associate Fellow, Fellow, Senior Fellow and Principal Fellow which is benchmarked against the [UK Professional Standards Framework](#). Fellowship of the HEA is the most common qualification held by those whose qualifications were reported to HESA by their institution – 14% of responses (HEFCE, 2015). In addition, there is a National Teaching Fellow [Scheme](#), designed to recognise excellence regardless of career stage and individual subject prizes, for example the [Law Teacher of the Year](#).

Promotion processes within the UK to some degree reflects differences in university mission, notwithstanding the 1992 Act (Parker, 2008). Thus, promotion within the former polytechnic (post-92), university sector tends to be based primarily upon appointment to a particular job role, with particular responsibilities associated with that function - for example, a Principal Lecturer with responsible for particular undergraduate programmes. The older, pre-92 universities focus primarily on recognising individual performance through a typical progression of Lecturer (Assistant Professor), Seni-

⁵ <http://www.sddu.leeds.ac.uk/learning-teaching/credit-bearing-courses-2016-2017/>

or Lecturer (Associate Professor), Reader and Professor. Criteria will typically include criteria to recognise performance across research, learning and teaching and academic administration or leadership. Research has tended to dominate the criteria for performance and in recent years, a number of institutions (including the University of Leeds) have revised promotion criteria (and job roles) in order to take account of educationally focussed activities and emphasis (Leeds, 2016). There remain concerns about the experiences of women, particularly in terms of reward and remuneration within HE, for example, nationally we find only 23% Female Professors (HESA, 2016). Steps are being taken within the sector. For example, the [Athena Swan](#) programme has been extended beyond its initial STEM (Science, Technology, Engineering and Mathematics) remit to address gender and equality issues amongst staff and students within the Arts, Humanities and Social Sciences.⁶

Part B: HE's Relationship with Professional Bodies (The case of Law)

The new regulatory and quality assurance framework proposed by the Government makes clear the continuing importance of the relationship with Professional and Statutory Regulatory Bodies (PSRB) (DfE, 2016a: 19). The legal education sector of England and Wales is, however, facing the somewhat unusual situation of a PSRB wishing (in formal terms) to detach its qualification framework from the higher education sector with which it was previously associated.

The relationship between legal education and the legal profession has been difficult at times in its history (Cownie and Cocks, 2009), often characterised by the degree of the control over the academic degree that the profession should hold. Thus, in 2010, the City of London Law Society (CLLS) sought broader influence on the qualifying law degree through its insistence that 'the content, quality and level of assessment of QLDs is in urgent need of review' with a new syllabus perhaps involving 'company law' (2010: 5). The debate has moved significantly on since the publication of the Legal Education and Training Review ([LETR](#), which concluded in broad terms that the current system worked well (2013: ix), but made a series of recommendations relating to diversity, information for entrants and greater clarity around qualifications frameworks. In response to this review, the legal regulators, with the Solicitors Regulation Authority ([SRA](#)) at the vanguard, have undertaken work on a series of wide-ranging reforms of legal education and training.

The [December 2015 SRA Consultation](#) generated significant negative responses from a wide range of interested stakeholders. Central to the SRA's December 2015 proposals was that qualification as a solicitor should be assessed by a Solicitors Qualifying Examination (SQE). This is likely to be split into two parts (Knowledge and Skills). Although there was ambiguity in the December 2015 consultation, subsequent statements from the SRA have indicated that a work-based period of assessed learning (comparable to the existing training contract) will be required. The SQE (Part 1) is proposed to be an online computer based assessment, set at graduate level (albeit without graduate benchmarking) and to be offered without exemptions (e.g. on the basis of prior study or qualification) or entry requirements (e.g. a degree). Significant drivers (and here we

⁶ The London School of Economics has announced plans to address pay inequalities (Havergal, 2016)

see, similar language to that adopted in the national HE landscape) are to increase the numbers of new providers and increase the availability of information to students about the performance of those providers to students. The SRA is currently consulting further on the concerns raised in the initial responses and will offer a further set of proposals in November 2016.

3. Conclusion

The UK Higher Education landscape has seen significant change in years. Central to this change has been a recognition, at all levels, of the need to strengthen teaching quality and associated assurance mechanisms. Quality assurance is now a significant activity at all UK universities and is a fundamental element in the overall strength of the sector. Nevertheless, the Higher Education and Research Bill proposes significant changes in the wider regulatory and quality assurance landscape. To some extent, the various proxies for quality that will be assessed will require individual universities to continue to focus efforts not only in delivering excellence in learning and teaching, but in developing robust measures to demonstrate the quality of their provision. The wider marketplace may also face disruption with new providers to the marketplace and concerns have been raised by Universities UK about the potential for the new framework to threaten the crucial relationship between research and teaching in a University's mission. The language of competition, multiple pathways and consumer choice is also seen within the legal education sector, with continued uncertainty ahead.

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