Citation for published version:

Karen Smith, 'Using multidimensional methods to understand the development, interpretation and enactment of quality assurance policy within the educational development community', *Higher Education Research & Development*, Vol. 37 (1): 173-187, January 2018.

DOI:

http://dx.doi.org/10.1080/07294360.2017.1342608

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Using multi-dimensional methods to understand the development, interpretation and enactment of quality assurance policy within the educational development community

Abstract

Policy texts are representations of practice that both reflect and shape the world around them. There is, however, little higher education research that critically analyses the impact of higher education policy on educational developers and educational development practice. Extending methods from critical discourse analysis (CDA) by combining textual analysis of a policy text with in-depth interviews with policymakers and policy users, this article seeks to better understand the process of production, interpretation, and implementation of policy. The article focusses on a leading national UK quality assurance policy in relation to the educational development community in order to uncover how policy is played out in practice. The findings paint a picture of a text that presents a version of higher education that is portrayed linguistically as universally accepted. Yet the methodological approach enables the uncovering of the complexities of the policy process that go beyond the text's words by highlighting the debates that shaped its development and the interpretations of its textual form that subsequently shape its enactment. Looking specifically at the constraints of policy boundaries, word choice, and calls to educational development action (or inaction), the policy text is analysed in light of educational developers' contexts and institutional positioning, surfaced through the research process itself. The article concludes by arguing that the combination of data collection and analysis methods used provide greater insights into how policy is played out in practice than the employment of any one of these methods individually could have achieved.

Key words

Policy development; quality assurance; educational development; critical discourse analysis; learning and teaching.

Introduction

Policy texts are defined as any 'medium or vehicle for carrying and transmitting a policy message' (Ozga, 2000, p.33); such texts can be found at all levels of higher education activity (international, national, institutional, departmental). Policy texts are important because they are 'pre-eminently, statements about practice—the way things could or should be—which rest upon, derive from, statements about the world—about the way things are' (Ball, 1990, p.22). But policies are 'more than text' (Lingard & Sellar, 2013); they are the processes that happen prior to writing the text and what happens after it has been written (Taylor, Rizvi, Lingard & Henry, 1997), courses of action and inaction (Codd, 1998), and 'textual interventions into practice' (Ball, 1994, p.18). The analysis of policy (including its production, interpretation, and implementation) can help us better understand representations of practice, the realities of that practice, and its impact on practitioners.

This research contributes to existing critical educational policy research (see *inter alia*: Young & Diem, 2016; Ball, 1994; Lingard & Sellar, 2013; Ozga, 2000; Taylor, 1997; Weaver-Hightower, 2008) and particularly to critical research relating to educational development (e.g. Bath & Smith, 2004; Lee & McWilliam 2008; Manathunga 2007; Peseta, 2008; Barrow & Grant, 2012). While higher education policy and educational development practice have both been submitted to critical scrutiny, there is little research that specifically critiques higher education policy in relation to educational development and educational developers. This article addresses this gap through the critical analysis of the UK's robustly regulated quality assurance policy arena within the stakeholder community of educational development. The focus is specifically on a UK higher education policy, however the complexities of policy development, interpretation, and enactment that the research uncovers will resonate with other higher education systems.

Quality assurance policy

The assurance of quality and the maintenance of academic standards have been key concerns for UK higher education over the last three decades (Harvey, 2005). Following the Dearing Report (NCIHE, 1997), a proposal to establish a national quality assurance framework was proposed resulting in the establishment of the Quality Assurance Agency (QAA) (Jackson, 2000). In the intervening years, the QAA has developed its approaches to quality assurance. In its current form, the Quality Code (QAA, n.d), which was developed through an open consultative approach, acts as a reference point for all QAA review activity and for quality assurance more generally.

Traditionally, the academic community has distrusted quality processes. Quality assurance is seen as intrusive (Newton, 2000), irrelevant (Cartwright, 2007), reductionist (Laughton, 2003), and symbolic (Cheng, 2011). Critics see quality assurance practices as disconnecting policy from practice (Anderson, 2006) and focussed on quality assurance over enhancement (Lomas, 2007). As the sector regulator, the QAA has received criticism for its role in the perceived erosion of academic autonomy and freedom

(Harvey, 2005) and more recently its fitness for purpose, influence and judgements have been questioned (e.g. Arnot, 2008; Brown & Alderman, 2008; Gove, 2013). The QAA's lack of positional power is likely to have influenced the development and focus of the Quality Code. Currently the QAA's future remains uncertain in light of the UK's new HE Bill (Greatrix, 2016).

Quality assurance policy exerts influence (directly and indirectly) on all higher education practitioners; but for one constituency in particular, a focus on quality enhancement is central to their work and how that sits with quality assurance agendas is discussed below.

Educational developer engagement with quality assurance policy

Educational developers have a complex relationship with policy (Smith, 2016). Although educational development is becoming more strategic and change-management focussed (Clegg, 2009), in relation to policy, educational developers have been positioned as 'mediators' situated between institutional policy makers and academic departments (Gosling, 2009, p.11). Educational developers usually interpret and translate policy rather than make it (Debowski, 2011). Quality assurance is not straightforward for educational developers. Movements towards increased quality assurance of higher education has provided opportunities for educational developers to exert national and institutional influence, but have simultaneously complicated educational development work 'merging the monitoring of standards with the development of good practice' (Land, 2004, p.6). Educational developers can easily 'become associated with the culture of compliance' (Rowland, 2002, p.58) and be viewed with the same distrust that hampers the QAA and quality assurance procedures more generally. Challenges of legitimacy, authenticity and identity lie at the heart of much educational developer research (see e.g. Shay, 2012; MacKenzie, McShane & Wilcox, 2007; Di Napoli, Fry, Frenay, Verhesschen & Verburgh, 2010); educational developer engagement with higher education policy is another site of struggle. There is, however, little research that focusses specifically on how educational developers engage with policy texts and policy processes more generally. This article aims to further understanding and to demystify the policy development process, though analysis of a quality assurance policy text and consideration of its development and interpretation by educational developers.

Theoretical and methodological background

This research sits within a transformative paradigm; it includes diverse voices and different realities in the research process, recognises the existence of power differentials, and seeks to bring about change (Mertens, 2007). The study draws on methods from Critical Discourse Analysis (CDA). CDA is a theoretical and methodological approach to studying language and its relationship to power, ideology and inequality. CDA defines language use or discourse as social practice (Fairclough, 2010); discourse is dialectically related to other elements of social practice (e.g. objects, forms of consciousness, values). Discourse is woven into contemporary life within institutional, social, and political structures; it both 'reflects and constructs the social world' (Rogers, 2004, p.5). Individuals internalise these discourses, which 'control

and organise what can be talked about, how it can be talked about and by whom (Hidalgo-Tenorio, 2011, p.186). Discourse is powerful and worthy of critical analysis.

To analyse this kind of language in use, Fairclough (2010, p.133) proposes a three-dimensional framework for discourse and discourse analysis. Here discourse is described through the analysis of a spoken or written text, interpreted through processing analysis (looking at the production, consumption and reproduction of the text), and explained through social analysis. CDA aims to not only describe and interpret discourse in context, but also to explain why and how discourses work (Rogers, 2004, p.2). Key features of analyses in CDA are to reveal taken-for-granted assumptions, challenge dominant views and engender change.

CDA is gaining momentum in higher education research; researchers have explored topics relating to the role and representation of higher education in contemporary society; higher education policy; pedagogic practice; and relationship and identity formation (see overview by Smith, 2013). Much of this research has focussed on the description and composition of different kinds of texts and not on their production, consumption and reproduction (Smith, 2013). What this kind of textual analysis cannot show is the 'meaning making' that happens when texts are interpreted (Fairclough, 2003, p.10) nor the decisions made during the policymaking process. A narrow focus on textual analysis and its reliance on an analyst's interpretation of the text is a criticism levelled at CDA generally (Paltridge, 2012, pp.198-99). The approach adopted here seeks to counter this criticism by going beyond the analysis of a policy text with a systematic, multidimensional and critical analysis of how policies are developed, received, adapted and accepted by a specific community.

Approach to the study

This article draws on the textual analysis of a key national UK policy for learning and teaching: the QAA's Learning and Teaching Chapter from its Quality Code (QAA, n.d.). Initial analysis was framed by Partridge's (2012, pp.77-9) steps for genre analysis, which asks questions relating to the text's setting; its focus, perspective and purpose; its intended audience and the relationship between writers and readers; the expectations, requirements and conventions of the text, assumed background knowledge and values, and its relationship to other texts. Further analysis explored Fairclough's key questions for textual analysis (1989, pp.92-3), focussing on vocabulary (frequency counts and key words in context), grammar (sentence function, actors and modality) and textual structure. Such close reading helps to draw out implied messages that reside in the organisation of a text, its structure and the words it uses (Fairclough, 2010, p.10).

The study then went beyond textual analysis to gain insight into the development, interpretation and enactment of the policy text. Empirical data were collected to enable processing analysis, comprising: five in-depth, semi-structured interviews with members of the Advisory Group (randomly selected from the

twenty-three group members) that were tasked to support the development of the policy, and ten interviews (purposively sampled to reflect a range institutional type, experience, and seniority) with educational developers, whose work is closely aligned to the policy's remit. Interview analysis drew out the themes relevant to the two constituencies. These themes were compared to identify areas of consensus and contestation, and then read in relation to the policy text. In the findings presented below, educational developer interviewees are allocated an individual number and Advisory Group members are unnumbered to preserve anonymity. The final section seeks to bring description and interpretation together by situating the analyses within the wider context of higher education policy development and educational development practice.

Findings

Portrait of a policy

The Learning and Teaching Chapter (the Chapter) is one chapter in the Assuring and Enhancing Academic Standards section of the UK QAA's Quality Code (the Code). The aim of the Code is to help safeguard the academic standards of UK higher education; assure the quality of the learning opportunities that UK higher education offers to students; promote continuous and systematic improvement in UK higher education; and ensure that information about UK higher education is publicly available. The emphasis is on quality assurance, but there is also a strong focus on quality enhancement.

The Chapter deals specifically with the learning opportunities that higher education providers make available to students and on the staff who teach and support learning; *learning and teaching* is referred to n=57 times within the text. The Chapter is aimed at senior higher education managers, especially those with a quality assurance remit; but its focus means that it is pertinent to those who work in academic enhancement, human resources, staff development and student support. Distinct groups of higher education professionals: e.g. quality assurance teams, staff developers, learning technologist, students unions, module leaders, senior management and notably educational developers are not addressed explicitly and only rarely mentioned. More generic references to *staff* (n=73) and *students* (n=177) are there, predominantly in terms of the impact that the expectations will have on them; for staff this is overwhelmingly in relation to their development. Overall, *staff* and *students* are not active agents in this text.

The focus for action rests with *higher education providers* (n=69). The document does not tell higher education providers what they have to do; there are very few modal verbs signifying obligation, such as *must* or *should*. Instead the Chapter describes what expected practices look like. These expected practices are sector-owned due to 'a public consultation with the higher education sector and other stakeholders with an interest in higher education' (QAA, 2012, pp.1-2) and the work of an Advisory Group, comprising sector experts in learning and teaching. Higher education providers are free to choose

how they meet the expectations. The Chapter has one single clear Expectation that is supported by a set of 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 Chapter is written primarily in present tense declarative sentences, for example:

Higher education providers use a range of external and internal information and feedback from diverse sources (the Chapter, p.16).

These syntactical choices reinforce that these are sector-wide (i.e. developed through consultation) expectations; they create the impression of 'timeless truths' (Palmer, 1987, p.63), where what is written is presented as something that was true, is true and will be true in the future. The content relates to key areas of learning and teaching practice: learning and teaching (n=57), assessment (n=41), feedback (n=27), technology (n=13), student engagement (n=10), professional development (n=7), scholarship (n=8) and reflection (n=7). They present a particular vision of higher education which emphasises active student engagement in learning, demonstrated through the description of learning and teaching activities (n=9), learning opportunities (n=38) and partnership (n=11) that support (n=57), enable (n=27), facilitate (n=17), and promote (n=15) learning. As one interviewee noted, this strong student focus is part of a 'general movement, that more general climate' (7); identifying 'working in partnership' as a feature that contributes to 'effective learning and teaching' (the Chapter, p.5) carries assumptions, as the interviewee continued, that 'students will be doing things' within a 'students as partners model' which might not always be the case, especially if students 'may actually want to just get their degrees out of the way as quickly and easily as they can' (7). Equally important, for this interviewee, was the lack of discussion around expectation management particularly in an environment where students are positioned 'as paying customers', which clearly raised issues in relation to the 'teaching process' (7).

The Chapter paints a picture of higher education learning and teaching practice which is linguistically represented as universally accepted, though in reality might well not be. Responsibility for the enactment of the policy is institutionalised (via the higher education providers) rather than personalised (through reference to individuals or particular roles). Educational developers are key stakeholders for this policy and their reception of it, in the light of its development, is discussed in the subsequent sections.

Mapping the territory: questions of content and boundaries

As part of a suite of connected QAA policies, all the chapters in the Code have the same structure, as outlined in the protocol for the Code's development:

Each Chapter will be developed to a common format, which makes clear what is expected of all higher education providers. Expectations articulate what all UK higher education providers should expect of themselves and each other, and what the general public can therefore expect of higher education providers (QAA, 2012, p.2).

In practical terms, this means each chapter looks the same. The educational developers interviewed found this format useful and easily navigable: 'just the way they are designed, these documents, and the typeface they use, and everything, they're quite accessible' (8). There is signposting both within the Chapter and across the Code more broadly:

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 (10)

Complying to such a uniform design, while recognising that the Chapter was part of a holistic view of quality in higher education, meant that, inevitably, constraints were placed on the policy development group during the development phase, which were not always well-received: 'we were given some pretty strict parameters to start with. And that felt, I think, confining to many of us.'

Among these parameters were the boundaries of the Chapter: what was to be included and what was not. These boundary decisions led to rich discussions around what one interviewee called the 'borderlands'. The most hotly debated borderland was assessment:

The biggest debate we had had around learning and teaching was around whether it should include assessment and that was quite a big debate.

The rationale for not including assessment was the existence of an assessment chapter already in the Code (Chapter B6). The Advisory Group did not unequivocally accept this separation initially; they recognised the importance of assessment in learning and teaching: 'I think not to look at assessment in the design of learning and teaching is a failure'. The ensuing discussions resulted in negotiations about 'what's in for us and what's out'. Inevitably, the result was a compromise.

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

On reflection, one Advisory Group member felt that this was the best approach, identifying ways to 'tie the two things together as best we can' across the two chapters. The educational developers interviewed did not overly challenge this separation. Indeed one interviewee assumed that the Chapter covered all three since learning, teaching and assessment are frequently discussed as a single entity.

While the Advisory Group debated and challenged the place of assessment in the Chapter, they were more unified in their support to integrate both inclusive practice and technology within the Chapter rather than in distinct and separate chapters, as they had been in previous QAA guidance:

It was really obvious to everyone, I think, quite early on, that [...] we needed to treat, treat this Chapter, have this Chapter reading all kinds of teaching and learning situations, whether it's elearning, 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.

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.

These boundary decisions were challenged by educational developers; for one interviewee particularly, they feared the integration would dilute a very important 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)

The Chapter represents a version of reality that has been crafted through discussion, debate and inevitable compromise. The multidimensional approach to analysis adopted here has shown that the boundary decisions, which are clearly drawn within the final text, were initially less well-defined and were party to some territorial battles. The resulting boundaries impacted differently on the educational developers, reflecting their own interpretations of the mapping of practice.

Crafting the text: the challenge of word choice and contestation

It was not only the content that caused debate during the development process, it was the very words that were chosen. Selecting the right words proved challenging for the Advisory Group:

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, that every, really every word that you're seeing here was debated and discussed

Selecting words that were sufficiently generic to ensure the Chapter was applicable to the diverse higher education sector also proved difficult:

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.

Overall, the educational developer interviewees did feel that the policy developers had done a good job. The Chapter was well-written, clear and self-explanatory:

I think they [the QAA] work very hard to keep their language clear [...] My impression is that it's very consciously written to not be ambiguous and not to use what people perceive as jargon (5).

Yet they did this with the recognition they were 'learning and teaching specialists' (8); the Chapter was their 'bread and butter'. This does not mean that the language was always neutral; some words and phrases were highly contested: two examples are *learning styles* and *learning outcomes*. When these

concepts are introduced into the Chapter, they are done so using the simple present tense (my emboldened emphasis):

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)

This representation again creates the impression of 'timeless truths' (Palmer, 1985, p.63), that are takenfor-granted, indisputable and uncontested; there is no uncertainty in the Chapter about the use of these concepts. This is in marked contrast to how the term *partnership* is introduced (emphasis added):

A partnership between staff and students **can empower** students to develop further as active and independent learners (the Chapter, p.5).

Here the introduction of the modal verb *can* adds an element of uncertainty to the phrase. *Partnership* may not be empowering to all students. This use of *can* makes the benefits of *partnership* less universally accepted than the discussion of *learning styles* and *learning outcomes*, outlined above.

Yet, the uncontested use of both *learning styles* and *learning outcomes* in the final policy text does not reflect the rich discussion around their inclusion that occurred during its development. The Advisory Group recognised that members of the higher education community might take issues with these concepts, as did some Advisory Group members themselves. A decision was made during the development process that these terms were sufficiently 'consistent with the rest of practice' within contemporary UK higher education to warrant inclusion.

The educational developers did indeed take issue with these terms. The lack of recognition of their contested nature was deemed problematic:

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)

The wide potential readership of the Chapter may not be aware of the critiques of some of the learning and teaching practices proposed and might well accept them unequivocally. Educational developers committed to challenge this by proposing to use the Chapter as a point of departure for critical discussion: 'I'll use it in my programme, and we will examine it, we will critique it' (4).

Words are never neutral, yet the presentation of the words in this policy text constructs a particular version of higher education reality as an irrefutable given. As with the previous section, it was through the combination of textual analysis and interviews with policy developers and receivers that light was

shone on the decisions behind the selection of the words that formed the final text and how the educational developers interpreted and then subsequently vowed to challenge those words.

Quantifiers as a call for action

For most of the educational developers interviewed, this Chapter was not especially radical. Interviewees felt that their institutions were already meeting the Chapter's Expectation and the Indicators of Good Practice e.g.: '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).

There were two areas, however, where the introduction of quantifiers, words that give information relating to the quantity or proportion of a noun phrase such as *some*, *any*, *every*, *none* (Burton-Roberts, 1986, p.138), marked the opening up of potential new areas of educational development work. The first relates specifically to opportunities for staff development:

Higher education providers assure themselves that **everyone** involved in teaching or supporting student learning is appropriately qualified, supported and developed (the Chapter, p.15).

Higher education providers make opportunities available for **all** those involved in teaching and supporting student learning (the Chapter, p.15).

The educational developers were confident that they offered sufficient provision for staff at their home campus: 'within our own UK-based campuses we are doing what is expected of us' (1). Non-standard staff (e.g. those who are not permanent and fulltime), including all the 'associate lecturers, technicians [...] and the lab assistants, the PhD students who are running the seminars' (3) and particularly those non-standard staff based overseas were seen as 'a huge challenge' (1) that no institution 'has really got quite right' (10). This was clearly an opportunity for educational developers to make a case to extend their provision; a call to action, and support for the educational development function, that perhaps this Advisory Group member (working within educational development themselves) recognised:

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.

The coupling of *every* with *student* in the Chapter, which occurs on n=25 different occasions, also presented challenges to the educational developers in terms of their provision. Equality is a strong feature of the Chapter and the decision to refer to *every student* so frequently was due to the persuasive argument of one Advisory Group member with an interest in that area:

Some of the language that came out was very much informed by their expertise [...] and that word *every* appears in a number of places, and that was their contribution.

While the educational developers recognised that much support was already in place in their institutions, they were not always convinced that *every* student would have the same access to it:

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)

The educational developers recognised that this might mean developing provision for specific groups of students, including those on collaborative programmes, research students, distance students, and students on placement.

These findings demonstrate how the interpretation of policy texts is context specific. There are different readings of a policy text depending on who is reading it and what position they are reading it from. The educational developer interviews showed how they were able to identify a small number of potential new areas of work, thus solidifying the importance of educational development activity in an area where the developers felt they were, for the most part, already doing a good job meeting expectations but where it was still important for them to justify the educational development function within their institutions.

Seeing the policy process differently

Finally, this project encouraged the interviewed educational developers to think more deeply about how they could and should be more engaged in the policy development process. Some interviewees admitted that they had not read the policy in depth before being invited to interview:

I hadn't read it before. I'd just looked at it before and it was on my list of things to do. I have been meaning to read it and now I have (1).

Another welcomed the opportunity to re-read it in more detail and reflected:

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)

Engagement in this policy-focussed research led the educational developers to reflect on their professional practice and the ways in which they engaged with policy, as highlighted here:

So this made me think, I actually need to go back to some of the literature about educational development [...] It kind of raises some interesting questions about what educational developers do and don't do. And you know, there is a mix, and I think it would be useful if there was a more consistent engagement in policy (7).

The research project itself, with its expectation that the interviewees engage with the policy text as part of the interview process, might well, inadvertently, have transformed educational development practices.

Concluding remarks

In many respects the policy text chosen for analysis was uncontroversial. Or at least it was for the stakeholder group chosen to discuss it with. Other groups might well have interpreted and enacted the

policy differently and different conversations would have ensued, reflecting the situatedness of policy and practice. Both policy and practice need a context. Here the policy selected for critical analysis comprises a text about learning and teaching that was shared with experts in learning and teaching. This focus sits well within the remit of contemporary educational development work (Debowski, 2011). The involvement of educational developers as members of the Advisory Group in the development process might also explain why the text generally works well for educational developers and speaks their language.

While the QAA's approach to the development of the Chapter as a sector-led activity, drawing on expertise within the sector through the specialist Advisory Board, reflects developments in stakeholder involvement in public policy development (e.g. Riege & Lindsay, 2006), it also suggests a lack of confidence in its own authority. There appears to be a conscious movement away from the regulatory language that featured in earlier QAA policies (Smith, 2010). This decision to change the tone of the policy might well be in response to criticisms from academics over the QAA's desire to control their practices (Harvey, 2005). QAA control was, however, exercised more subtly through the structuring and formatting of the Chapter, where the necessity to shape the document in uniform ways and to include and not include specific content went against some of the policy developers' recommendations. The tight constraints regarding the Chapter design and its contents renders some of the Advisory Group's engagement symbolic rather than substantive. While its input undoubtedly shaped aspects of the policy text, the restrictions imposed on the Advisory Group raise questions about the extent to which the Chapter was truly sector-owned.

The choice of language in the Chapter presents a picture of learning and teaching in higher education, which emphasises inclusivity, partnership, and support for learning. Yet not all depictions presented in the Chapter were uncontested. The decision to position students as partners, rather than consumers, within higher education might well help to counter the rhetoric of consumerism (NUS, 2012; Healey, Flint & Harrington, 2016), but does not recognise the significant challenges that the reality of a consumerist and marketised higher education poses for many working and studying within higher education (e.g. Molesworth, Scullion & Nixon, 2011; Bunce, Baird & Jones, 2016). Additionally, the educational developers highlighted two problematic concepts – *learning outcomes* and *learning styles* – both of which have been extensively critiqued (e.g. Hussey & Smith, 2002; Coffield, Moseley, Hall & Ecclestone, 2004). While the vision of higher education represented in the Chapter might well be reflect sector practice, this does not mean that the practice needs to be accepted uncritically. There are examples within the data that show that these educational developers were not 'passive recipients' (Newton, 2000, p.162) of the new policy, instead they intended to use the policy as a means to stimulate critical debate and discussion, therefore distancing themselves from the quality assurance roles that often sit uncomfortably with an educational developer identity (Land, 2004).

Equally there were examples where the Chapter was used for the educational developers' gain. Like the QAA, educational developers often struggle for legitimacy and credibility institutionally (Clegg, 2009) and for some developers, the Chapter opened up areas of work for them, which helped to diversify and legitimise their role, important in a field of work that is notoriously insecure (Debowski, 2011). Members of the Advisory Group, who held educational development roles, used their position to write the educational development function into the policy text. Finally, engagement in this research, with its requirement to reflect on the Chapter, led to discussion around educational developers' engagement with policy, in terms not only of its implementation, but also its development. Here the educational developers were reflecting on the remit of their role and their current and potential future positioning in relation of policy. This hints at the claim made by Chivers (2003) that in-depth interviewing, around aspects of work, can have a profound impact on professional practice.

It is through the deployment of a multidimensional approach to the analysis of policy that the inherent complexity of the policy process has been highlighted. Policy texts are representations of reality, but they are not static words on a page. Policy texts are encoded and decoded in complex ways (Ball, 1993). To understand policy, you need to get closer to the policy process and the power struggles, contestation, compromise, resistance, acceptance and adaptation that it involves. The approach outlined here, with its combination of textual analysis and interviews with policy developers and policy users, provides greater insight into the how policy interfaces with practice than the employment of any one of these methods individually could have achieved.

Acknowledgements

I acknowledge the support of the Staff and Educational Development Association, whose Research Legacy Grant made this work possible. This article is dedicated to Cecilia Mpamhanga, who was there throughout.

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