

**TEACHING QUALITY ASSESSMENT, LEAGUE TABLES AND THE
DECLINE OF ACADEMIC STANDARDS IN BRITISH HIGHER
EDUCATION**

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On Thursday 11 January 1996 a gathering of some of Britain's most senior university executives was convened in London under the chairmanship of the former Principal of the University of Glasgow, Sir William Kerr Fraser. Those invited included Professor Brian (subsequently Sir Brian) Fender, then chief executive of the Higher Education Funding Council for England (HEFCE); Professor David (now Sir David) Watson, then Director of the University of Brighton; and Professor Gareth (later Sir Gareth) Roberts, then Vice-Chancellor of the University of Sheffield and subsequently President of Wolfson College, Oxford. The Joint Planning Group (JPG), as it was called, had no women members but Diana (now Baroness) Warwick, Chief Executive of the Committee of Vice-Chancellors & Principals (now Universities UK) served as one of its joint secretaries. Also present at its meetings was an 'assessor' nominated by the Department for Education & Employment (DfEE). Her job was to make sure that the government's voice was heard at the JPG and that, in spite of the confidential nature of the JPG's proceedings, her masters at the DfEE would be kept fully informed about what was going on.

University staffs and students, by contrast, - and even Members of Parliament - knew and were to know little about what was going on. But what was going on has had the profoundest effect on the management of British universities and on the public perception, nationally and internationally, of the quality and standards of British higher education. For the current multiple confusions - and cynicism - over how this quality is

guaranteed and how those standards are assured, the members of the JPG, meeting privately once a month throughout 1996, bear a major responsibility.

The JPG was convened ostensibly to sort out and streamline the various mechanisms of quality assurance that were then in place in Britain's universities and degree-awarding colleges. In his opening remarks Sir William 'referred to the burden of accountability now placed on higher education institutions'. During the Thatcher years government, in the name of the taxpayer, had demanded to know what the universities were doing with taxpayers' money. This was a reasonable demand, and the universities responded to it reasonably. Realising that a full-blown system of inspection would bring with it the danger of government interference, the Committee of Vice-Chancellors & Principals offered instead a form of self-regulation which, for the time being, the government accepted.

Thus was born 'academic audit'. Teams of auditors - senior academics - went from institution to institution inquiring whether the systems each institution claimed to have in place to assure quality and underpin standards really were in place, and worked. Reports - originally confidential but later public - were compiled, incorporating praise and criticism. In broad terms, academic audit has been a success story, forcing academics to confront issues which most had hardly bothered to think about hitherto: why were they doing what they were doing? how did they know they were doing it well? how could it be done better? Many issues which had lain buried under the ivory towers of academe were brought to the surface at last: the real criteria used for promotion, for example; the right of students to complain about shoddy teaching, and to be taken seriously. As one Vice-Chancellor uncharitably put it, audit asked 'the devil's questions'; but he did not deny that such questions needed to be asked.

But academic auditors did not test quality and they did not pass judgements on standards. Audit reports did not result in a 'score', and could not be used to construct a league table or to inform funding decisions. This was precisely what the reports of Her Majesty's Inspectors (HMIs) did in relation to the polytechnics. The polytechnics had never enjoyed the academic autonomy of the universities; instead, the Council on National Academic Awards supervised their standards and awarded their degrees, while their quality was inspected, and graded, by the HMIs.

In 1992 the Conservative government passed the Further & Higher Education Act. This enabled the polytechnics to acquire the coveted title of university, but required the 'old' universities, along with the 'new', to submit to a regime of inspections of teaching quality. Audit was to continue under the direction of a new body wholly owned by and answerable to the higher education institutions, the Higher Education Quality Council (HEQC), while the inspection of teaching - Teaching Quality Assessment (TQA) - was to be carried out by the Funding Councils established by the 1992 legislation. At first TQA, in England, led to verdicts of Excellent, Satisfactory or Unsatisfactory for each department inspected; but in 1995 these literal gradings were replaced by numerical grades, from 1 ('not approved') to 4, in each of six 'aspects of provision': so a maximum of 24 points could be scored for each inspection.

Strictly speaking the grades were not supposed to be aggregated, but of course everyone did so. The Funding Councils and the DfEE looked to these aggregate scores to judge departments against each other, and many Vice-Chancellors decreed that their university websites would announce points scored out of 24 almost as soon as the inspectors had

given their oral verdicts at the end of each 3-day inspection. For the compilers of the university league tables the scores were manna from heaven.

But if university departments were being inspected and graded as to quality, what need was there for a quite separate inspection of quality assurance mechanisms? In 1995 Professor (now Sir) Graeme Davies, then chief executive of the HEFCE, proposed that audit should only take place where a TQA suggested that something was seriously amiss. At the grass roots there was deep and growing unease at the increasing drain on resources that both audit and TQA demanded. Government, on the other hand, made it clear that TQA must continue, because rumour had it that the universities could not be trusted to police themselves, and because TQA resulted in information which the public could easily assimilate - a list of rankings of the sort which the American public had got used to. Both sides agreed to remit the matter to the JPG. At the end of 1996 the JPG recommended that the HEQC be wound up, and that its audit functions, along with TQA, be given into the hands of a new body, the Quality Assurance Agency (QAA). On this Agency a number of 'independent' directors, plus those nominated by the Funding Councils, would be in a majority.

The CVCP agreed to these proposals. To Vice-Chancellors it seemed no longer to have mattered that self-regulation and academic autonomy were at an end. Vice-Chancellors of the 'new' universities lacked the vision to see themselves primarily as anything other than highly paid managers of vocational training centres; they had never operated under a regime of academic autonomy; most of them understood it little and cared even less. The Vice-Chancellors of the 'old' universities hoped that because of the superior resources they commanded, and the research culture in which they operated, their institutions would continue to do very well under TQA, the results of which were already suggesting a

strong but hardly surprising link between an above-average resource base and 'teaching excellence'.

Both parts of the enlarged higher-education sector accepted that the QAA would examine academic standards as well as teaching quality. Even the 1992 Act had not gone so far as to hand the policing of academic standards over to any external agency. But early on in its deliberations, and at the urging of the DfEE's 'assessor', the JPG had gone on record as agreeing that the proposed new agency would indeed take on board 'the explicit integration of standards issues with quality issues'. And in acquiescing in the proposition that the QAA would police academic standards the CVCP (in effect) sold this all-important pass as well.

In the debates which preceded the establishment of the JPG, a central issue had been the preservation of the academic autonomy of institutions, and their individual responsibility for standards. Repeatedly during these debates, government ministers had given public expression to their professed respect for academic autonomy, academic diversity and academic freedom (see, for instance, the speech by the Secretary of State for Education, Mrs Gillian Shephard, to the CVCP on 2 Dec. 1994, and her letter to the CVCP of 21 Sept. 1995). And in its proposals (*Developing Quality Assurance in Partnership with the Institutions of Higher Education*) to the Secretary of State on the development of quality assurance, the CVCP in July 1995 reminded her that 'Standards are in law solely the responsibility of the institutions individually'. Indeed, it was in 1995 that the HEQC, with the approval of government, had established its Graduate Standards Programme (GSP), charged with the task of producing, from within the sector, descriptors of threshold graduate standards that the sector as a whole could endorse. Meanwhile, the Quality Audit Group of the HEQC was encouraging institutions to define, and publish, the discrete

standards they used for assessment and degree-awarding purposes, so that the public might know what these standards were, and make judgments accordingly. In all this work, the preservation of academic autonomy remained a cardinal principal.

I myself doubt that the government was ever sincere in its desire to endorse this preservation. In my Inaugural Lecture at Middlesex University (29 November 1995) I noted that the HEFCE's own proposals for the development of quality assurance, published in the previous June, had contained an ominous proposition, namely that the HEFCE, either directly or through the proposed single quality assurance agency, would be able 'to undertake aspects of the monitoring of academic standards'. And I added:

One does not have to be a very sophisticated student of public administration to realise that an agency which 'monitors' academic standards will not confine itself for very long to the mere reporting of facts. It will find it exceedingly difficult to restrain itself from commenting upon what it monitors, and then making proposals based upon those comments, and then suggesting sanctions if its proposals are not adopted.

What the JPG proposed was a single quality-assurance agency, ostensibly to 'support institutions in discharging *their responsibility* for the maintenance and enhancement of the quality and standards of their educational provision' (para 6 of the JPG's First Report; my emphasis). It assured those who read its reports that in framing its proposals it sought to respect 'the academic autonomy of institutions and *their individual responsibility for standards*' (para 8a; my emphasis). What has actually emerged is a three-fold process which, taken as a whole, amounts to the most comprehensive assault on academic autonomy since the reign of James II.

The proposed new quality-assurance process involved self-evaluation by institutions, followed by what were termed 'agency-managed' external subject/programme reviews and 'agency-managed' external institution-wide reviews. By 'agency-managed' the JPG

meant that the management would be undertaken by a new, single quality-assurance agency, headed by a board of directors numbering 14 persons, of whom only four would be nominated by the representative bodies of higher-education institutions; of the remainder, four would be nominated by the funding bodies and six would be 'independent'.

To understand what such a constitution has in practice amounted to, we need to remember that the funding bodies are creatures of the government, and that the funding-body nominees, and the nominees of the HE sector, together appointed the first 'independent' directors. The first 'independent' directors were persons whom the government regarded as *persona grata*. But even had this not been the case, the fact that the future quality assurance of universities was to be overseen by a body which the universities themselves do not control amounts, of itself, to an abandonment of their autonomy, and of their individual responsibility for standards.

At its meeting on 15 February 1996 the JPG heard a plea from John Stoddart, the chairman of the HEQC, that 'the simplest way to establish the new agency would be to re-constitute the HEQC under a new name and with appropriately revised Articles of Association'. On the face of it, this proposal made a great deal of sense. The HE sector itself owned the HEQC; all its work could have been accommodated within the notion of self-regulation. But the government had already made clear its opposition to this notion. 'The issue', the Secretary of the HEFCE pointed out, 'was a political one rather than a technical one'. On 1 March the JPG vetoed Mr Stoddart's proposal, choosing instead to establish a completely new agency not based on any self-regulatory principle. And at its meeting on 4 April, the JPG agreed that the F1EQC 'would be wound up'.

And so it was, almost exactly a year later. In April 1997 the HEQC was wound up, and its functions handed over to the new Quality Assurance Agency. During its first four-and-a-half-years' existence confrontation, controversy and subversion bedevilled the QAA's work. As its chief executive its board of directors rejected the application from the best candidate, Dr (now Professor) Roger Brown, who as head of the HEQC was known to be street-wise about and inherently suspicious of government and who had gone out of his way to make himself user-friendly to the HE sector. Instead the QAA board chose John Randall, formerly Director of Professional Standards and Development at the Law Society. Randall's strong belief in an intrusive, inquisitorial system was reflected in every initiative the QAA undertook. Under Randall the QAA published a veritable armoury of Handbooks, Guidelines, Codes of Practice and Programme Specification Templates, not to mention the National Qualifications Framework. Under Randall the reputation of the Agency, which was never high, sank without respite.

In retrospect, Randall's handling of the row over the alleged dumbing down of academic standards at Thames Valley University, which resulted in the resignation of its Vice-Chancellor, Dr Mike Fitzgerald, may be seen as a major turning point in his relations with the sector. There is, in fact, no evidence that academic standards were dumbed down at TVU; Randall's inspectors certainly never found any such evidence. That they did find evidence of academic mismanagement is however beyond question. Heads of 'new' universities trembled as they read, in the TVU report, damning judgements that could equally have been made of their own institutions, and of them. I can still vividly recall how, as Pro Vice-Chancellor for Quality & Standards at Middlesex University I was asked to prepare an analysis of Middlesex University's quality-assurance systems compared with the QAA's critique of TVU, and was then told to suppress the report once

I had completed it. On the face of it the 'old' universities had nothing to fear. But if Randall had brought down one Vice-Chancellor, might he not bring down others?

Meanwhile, academics operating at the coalface played a merry game with the QAA's entire inspection process. Academics are not fools. They devised cunning strategies for obtaining the best possible inspection outcomes. Departments preparing for inspection were put through dress rehearsals, at which external experts (often inspectors themselves operating on a freelance basis) offered advice and guidance. Staff, students, alumni and employers of alumni were coached as to what to tell the inspectors. A teaching inspection carried out by the QAA was not an inspection against a 'gold standard'. Rather, it was an inspection of the extent to which a department attained the aims and objectives *that it set for itself*. So departmental 'Aims and Objectives' were meticulously drafted so that they only referred to goals that could be comfortably achieved.

As Lord Dearing's *National Committee of Inquiry into Higher Education* concluded in July 1997 (though no one took any notice at the time), universities learnt to play the TQA game. According to statistics compiled by the *Times Higher Education Supplement*, the proportion of departments obtaining an aggregate score of at least 22 points rose from around a third in the 1996-98 round to over two-thirds in 2000-2001. High scores fell like confetti at a wedding. In June 1999 *The Times Higher Education Supplement* revealed that of the 262 subject review reports completed thus far, using the scoring methodology, over half disclosed a score of at least 22 points. In the subsequent round of reviews (1998-2000) over 50 per cent disclosed scores of 22 points or higher. The average departmental score, calculated by the Professional Courses Unit at the University of Lancaster, rose from 20.5 in 1995-96 to 21.8 in 1999.ⁱ 'Old' universities could no

longer look to TQA to differentiate them from the ex-polytechnics. And when high scores were so universal, how could TQA ever be used to inform funding?

The QAA subsequently suggested that these increases in aggregate scores actually reflected real improvements in quality, and the Agency implied that such improvements came about at least in part because of the Agency and its work. I very much doubt that this is in fact what has happened. I suspect, rather, that higher education institutions did indeed simply get better at 'playing the game', and I am afraid that I have to agree that the prophecy contained in Lord Dearing's 1997 report on higher education did indeed come true, namely that in relation to subject review, institutions simply learned how to beat the system.ⁱⁱ Those of us inside the sector knew that before each inspection there was exhausting, exhaustive and rigorous preparation, to the extent that some institutions attempted to 'script' the entire inspection visit - for example by carefully choosing and rehearsing the students whom the inspectors were to meet. Indeed, it is a well known fact that subject review gave rise to a whole new industry - the higher education quality assurance industry - in which individuals and corporate entities (such as the Professional Courses Unit at the University of Lancaster) developed exciting new income streams by acting as consultants to universities and colleges subject to the inspection process. University chief executives liked impressive subject review scores, and they were, literally, prepared to invest heavily to achieve high marks. But what happened after the inspectors had departed? The short answer is that no one ever had the courage to find out.

But high scores were indeed dearly bought. An independent investigation commissioned by the English Funding Council reported in 2000 that the combined demands of the QAA upon the sector amounted to £40 millions [€60 millions] per annum; a single QAA inspection visit cost as much as £250K [€375K]. Even the DfEE had to concede that

there were far better uses to which this money could be put. Without publicity, a number of universities declined to submit themselves to a new round of academic audits. A consortium of old universities threatened to devise its own system of inter-institutional peer review of teaching, the results to be presented to the government, completely bypassing the QAA. The Academic Council of the London School of Economics resolved to withdraw from its 'engagements' with the Agency.

At the end of March 2001 the Labour government was forced to agree that the inspection methodology employed by the QAA was far too intrusive and costly, and called for a reduction of around 40 per cent in the burden of teaching inspections and a concomitant reduction in the QAA's funding. Under intense pressure both from the government and the 'Russell Group' – the UK's Ivy League – the QAA was forced into further concessions. In a consultation document issued at the end of July 2001 the QAA proposed a 'lighter touch', by which many university departments (perhaps as many as 90 per cent in a single institution) would now escape inspection altogether: the major tool of inspection was to be an academic audit every three to five years. The statistical 'series' which TQA promised thus came to an abrupt end. Little wonder that *The [London] Times* and the *Daily Telegraph* – two of the major compilers of university rankings in the UK - bemoaned the government's capitulation. Little wonder, too, that John Randall saw the writing on the wall, and resigned (21 August).

Ultimately, quality in higher education cannot be reduced to a dangerously simplistic rankings list, however appealing rankings may be to certain newspapers and their gullible readers, not to mention university governors whose attention span cannot (it seems) extend beyond a set of numerical performance indicators laid out tabloid-style. Nor can

academic quality be policed without the willing and overwhelming consent of the practitioners. Why did the august members of the JPG not grasp this simple fact?

But there is a supreme irony in the aftermath of these momentous events. Any objective analysis of the history of quality management in British higher education must acknowledge that over the past decade or so since these events quality assurance has become much more intrusive and directive. Institutional autonomy has been – in my judgment – very seriously eroded in the process. Space does not permit me to fully deploy here arguments I have used elsewhere. The current arrangements employed by the QAA involve multiple layers of inspection – at the level of the subject and of the institution – by an army of inspectors (‘auditors’). I am not at all impressed by the argument that since the criteria they use derive in part from the work of subject-specialists, it merely represents and reflects a new type of ‘self-regulation’ through a species of shared autonomy. Autonomy shared is – in my view - autonomy lost. The truth and gravity of this conclusion is in no way lessened or modified by the fact that the universities and colleges have been willing participants in the erosion of the freedoms they once held and still profess to hold so dear.

It might of course be argued that such erosion is justified if it results in better quality academic programs delivered to higher standard. So far as the new methodology (inaugurated in 2002) is concerned I see no evidence that this is so. Indeed, such evidence as we have seems to me to point, unequivocally, to the fact that, parallel with a more intrusive inspection regime, and in spite of it, the past half decade or has witnessed a decline in academic standards. Let me give some examples.

Last year Paul Buckland resigned as professor of environmental archaeology at Bournemouth university. He did so in protest at the decision of university authorities that

13 students whom he - and a formal examinations board - had judged to have failed a course should none the less be deemed to have passed it. In so doing, the university authorities appear to have endorsed the view of a senior official that students should have been able to pass the course merely on the basis of lecture notes, without doing the required reading.

Nothing could better illustrate the sorry level to which academic standards have fallen in many British universities in recent years. And it's a problem that affects many other parts of the sector, not just the post-1992 universities of which Bournemouth is one. In the autumn of 2006 it emerged that at the University of Liverpool a drastic reform of the grading process had resulted in the proportion of students achieving first-class honours jumping from 7% (2005) to over 17%. It apparently became possible for Liverpool students to be awarded first-class honours without having actually achieved a first-class mark in any individual component of their degrees.

A year ago I was asked to advise a postgraduate student who had recently completed – unsuccessfully – an MA degree at one of our great Russell Group universities. In order to protect the identity of the student I shall reveal here neither her name nor the name of the university to which she paid several thousand pounds to study for a one-year Master's in Business plus an Asian foreign language component.

The student passed – with flying colours – all the components of this taught MA, save for the foreign language module, which the Board of Examiners deemed she had failed. The student's work for this language component had been adversely affected by medical issues, the nature and impact of which are not in contention. As a matter of fact the regulations for this degree, as set out in the Programme Handbook, make no mention of the necessity of obtaining a pass mark in the language module in order to be awarded the

degree – this seems to have been an unwritten assumption made by the Board of Examiners, but never apparently communicated to the students.

Be that as it may, if a student coming before a Board of Examiners looks as if s/he might be failed the particular degree outright, best practice would dictate that the External Examiner's attention be especially drawn to the case. Certainly, the apparent failure in the language component, as determined by the Internal Examiners, should have been forwarded to the External Examiner for detailed scrutiny and confirmation.

This did not happen in this case, and the reason it did not happen was that the Board of Examiners actually contained no External Examiner with competence in the Asian language concerned. The Board of Examiners contained only one External Examiner, and this lady has willingly and generously confirmed to me, in writing, that she has no expertise in this language, and at no time oversaw either the drafting of the language assessments, or the moderation of the language marks provisionally awarded by the Internal Examiners.

The university was not best pleased (to put it mildly) with my direct approach to the External Examiner, and has now issued instructions to all its External Examiners not to have dealings with any third parties without its prior approval. But as regards the particular student in whose case I had been asked to interest myself, the cat had of course already been let out of the bag. So the university sought – desperately – to cover its tracks in another way. It now claimed that whilst it was perfectly true that the sole External Examiner appointed to oversee standards in this Master's degree had no competence in the language component, an altogether different External – with such competence – had subsequently looked at the student's language script and had confirmed the fail.

I have two problems with this alibi.

The first is that this second External, whilst certainly an expert in the language concerned, had never been formally appointed to scrutinise this MA. The second is that this gentleman is, inter alia, head of a specialist centre at his own institution which has a formal, publicised relationship with the university at which my student acquaintance had pursued her MA studies. Such a relationship must – surely – create a conflict of interest and preclude this gentleman’s appointment as an External Examiner, at any level, at the university at which my student acquaintance was enrolled.

I have recently been reading the QAA audit report on this Russell Group university. Regarding the university’s ‘framework for securing quality and standards,’ the auditors were pleased to confirm that broad confidence can be placed in the soundness of the University's current management of the quality of its programmes.’ The report went on to opine that recent procedural changes ‘support confidence that the future management of the quality of programmes will continue to be sound.’

This audit was carried out in 2004, at a time when the state of affairs I have described – the absence of any External Examiner with relevant language expertise to scrutinise the language component of a taught MA in Business and an Asian language – already existed. Auditors are busy people, and they clearly overlooked the flawed quality-assurance framework in which this degree operated – or perhaps it was somehow hidden from their view.

How has British higher education got itself into this mess?

Part of the answer lies in the league-table culture that now permeates the sector. The more firsts and upper seconds a university awards, the higher its ranking is likely to be. So each university looks closely at the grading criteria used by its league-table near rivals, and if

they are found to be using more lenient grading schemes, the argument is put about that "peer" institutions must do the same. The upholding of academic standards is thus replaced by a grotesque "bidding" game, in which standards are inevitably sacrificed on the alter of public image - as reflected in newspaper rankings.

The external examiner system ought in theory to act as a check against this. But it doesn't. In the modular degree frameworks in which most universities now operate, the role of the external examiner has been transformed - and reduced - from gatekeeper of standards to compliance manager, trying to ensure that university assessment schemes are uniformly enforced, rather than passing judgment on their fitness for purpose.

But part of the answer also lies in the changing nature of the student body. As UK students come to pay a greater proportion of the real cost of their tuition, they view themselves less as clients or even partners in the learning process and more as customers with needs to be satisfied. They are less interested in the acquisition of knowledge and of the critical skills needed to evaluate it, and more interested merely in acquiring and regurgitating those segments of knowledge necessary to obtain a degree. It is now commonplace for students to complain if they are expected to read more than the "recommended reading" set out in the module syllabus, and some will even protest if they are asked to go into a library and read material of their own choosing, not included in the "course reader" they expect each lecturer to provide. And if material not included in the lectures appears in an examination question, their protests are likely to be louder still.

Standards of English literacy at UK universities are often poor. To compensate for this, lecturers are pressured to "mark positively". This is particularly true in relation to international students, whose full-cost fees are now a lucrative and essential source of much-needed revenue. I have heard it seriously argued that international students who

plagiarise should be treated more leniently than British students, because of "differential cultural norms". It is indeed rare, nowadays, for habitual plagiarists to be expelled from their universities.

Ultimately, however, the blame for the erosion of academic standards lies at the doors of the senior managers and the governing boards to whom they are answerable. When a professor says that a student should fail a course, the wise vice-chancellor will support that decision, and the lay governors will congratulate both for prioritising standards rather than student retention and customer satisfaction.

Teaching Quality Assessment was justified in part because - it was said – it would enable meaningful comparative data to be published about institutional teaching performance. This was – and remains – a nonsense. As Professor Brown and I argued in an American journal last year:ⁱⁱⁱ

- There can never be perfect, or even adequate, information about teaching quality, mainly because there is no agreement across higher education about either what is meant by such quality or how it should be measured.
- Even if there were agreement about defining teaching quality, it would still be necessary to adapt the definition to the interests, learning approaches, and circumstances of ever-increasing numbers and types of students. That is, no one size fits all.
- Even if the definition could be adapted for all the numbers and types of students, it is not easy to see how the necessary information could be provided, in advance, in an economical and accessible form, for each student or potential student.

- Even if this information about teaching quality could be adequately provided to students and potential students, it would not necessarily be the best use of faculty and other resources for either accountability or for quality improvement.

Incidentally, Professor Brown and I went on to observe that these limitations apply with equal force to commercially produced league tables.

So we return to Sir William Kerr Fraser and his Joint Planning Group. It is now clear that its mode of deliberation not only ran counter to any sensible notion of open government. Its minutes (which were never published) show an astonishing ignorance of the grass roots and an astonishing deference to government. At its first meeting Sir William 'challenged the Group to see the task before it as devising machinery which could be in place in 10 years time' and which would 'stand to the credit of the Group.' In fact, the JPG's eventual proposals lasted barely half this time and amounted to a colossal waste of academic energy and public money. This would be funny if it were not so tragic.

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ⁱ *Times Higher Education Supplement*, 11 June 1999, 3.

ⁱⁱ National Committee of Inquiry into Higher Education, *Higher Education in the Learning Society* (London, 1997), Main Report, paragraph 10.68.

ⁱⁱⁱ G. Alderman & R Brown, 'American and British Higher Education: Common Problems, Common Responses,' *College and University Journal*, vol. 82, no 3 (Summer 2007), 19-24