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Power and Discourse in the Policymaking Process

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Power and Discourse in the Policymaking Process

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*A thesis submitted for the degree of Doctor Business Administration
(Higher Education Management)*

*University of Bath
School of Management*

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Sean Mackney

Declaration of authorship

I am the author of this thesis, and the work described therein was carried out by myself personally.

Sean Mackney

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Abstract

Power and Discourse in the Policy-Making Process

This thesis contributes to the understanding of how to research the process of policy formulation, how to practice policy influence, and how to create theoretical models to explain how policy formulation occurs. It applies the conceptual frames of Bourdieu and Fairclough's model of three-dimensional critical discourse analysis to analyse the policy discourse and argument relating to English HE policy between 2015 and 2016. The thesis argues that the Government's 2015 Green proposals represented the most radical policy shift in English HE policy for over 20 years, marking the end of the era of New Public Management and the beginning of a new era of HE Privatisation. It shows the significance of context that made that policy shift possible and analyses the effectiveness or otherwise of Government and stakeholder policy actors' discourse to exert power over each other, and the way Government used discourse to see its policy proposals gain acceptance.

There are a number of implications for policy research, practice and theory arising from this research. First, it has shown that the application of discourse technologies in policy writing can increase the levels of influence of that writing, and that Critical Discourse Analysis can be profitably applied as a research methodology to the field of policy studies. Second, this study has demonstrated that a number of new discourse categories developed through this thesis augment its explanatory power when applied to policy discourse. Third, the thesis has adapted Fairclough's Three-Dimensional Model to integrate the role and agency of policy actors in each of the three dimensions. Fourthly, the eighteen precepts of a new theoretical approach to policy analysis, entitled the Fairclough-Bourdieu Framework are defined. This approach combines the models and concepts of Bourdieu and Fairclough, augmented with additional concepts and roles for policy actors developed through this thesis.

Finally, the Fairclough-Bourdieu Framework is conceptually integrated with Kingdon's Multiple Streams Approach to extend the critical reach of one of the leading theories of the policy process. It concludes with recommendations for further research, to enable an even more comprehensive answer to the question 'How is policy made?'

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Doctoral theses are always a labour of love. It has been a fantastic experience producing this thesis but there were many times during its long period of production that I did not believe it would ever be finished. There have been many people who have helped and inspired me along the journey, but I want to thank a few who made a special contribution or sacrifice.

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Sean Mackney, February 2023.

Chapter I: Introduction

This is a study about power, about discourse and about those who use it in the development of the most radical and significant piece of higher education (HE) policy in England in the last 30 years. It is a piece of legislation that many countries are seeking to pass but is also instructive on how really radical policy ideas can be progressed without dilution or reversion to the previous norms. It follows the development of this policy from the launch of the policy ideas in a 2015 Government Higher Education Green Paper, through to the cementing of those ideas in policy proposals put forward in the 2016 Government Higher Education White Paper.

Policy making is not something that is clearly understood, even after seventy years of development as a field of policy studies. Much policy theory is naïve and uncritical, taking arguments in the text as truth and making assumptions about the intentions of those making policy and the purposes of policymaking processes. It does not explore what is not said and why it is not said, it does not examine why policy it is written or what the purpose is of the writer in choosing certain forms of writing over another. This study aims to contribute to the understanding of policymaking through a different approach.

This study seeks to apply critical concepts and methodologies to get under the skin of what happens in the ideational phase of policymaking, not the passage through parliament as it becomes legislation, not the practical matters of implementation and effectiveness, but at the stage of ideas. It will use Pierre Bourdieu's concepts of field, habitus and field doxa, and of symbolic violence, to understand the way that power works in societies and communities, and to uncover the subtle and even sub-conscious workings of power.

Policy ideas are almost always communicated in text. They lead to policies that determine actions: they exert power over others. They are therefore usually the subject of considerable discussion amongst those with an interest in exercising power and those who may be subject to it, who have a stake in it, and who may choose to support or resist. This study examines how text is used and produced, and the people who use it and how they interact through text to advance or resist a policy, focusing on policy actors from Government and the principal policy lobby organisations in UK higher education, the representative and 'mission groups' of Universities UK, GuildHE, University Alliance, Million Plus and The Russell Group. From this study it aims to reveal insights about effective discourse practices in order to inform the practice of policy professionals.

This study will therefore study policy development through the lens of the discourse that articulates and shapes it, through the study of the text, the interactions involved in producing and shaping it and the wider structures of societal and cultural power that condition it. It will use a critical methodology to analyse that discourse, Norman Fairclough's Three Dimensional Model of Critical Discourse Analysis, in concert with Bourdieu's concepts of power and society, and test the suitability of this combined methodology to research a particular moment

in the development of a major piece of policy. It will also propose improvements to the model and methodology that arise from its application to the field of English HE policy discourse. In doing so it hopes to advance the field of critical policy studies and the methodologies that are used to research policy development.

Whilst this study examines only one piece of policy, in one country, at a particular historical moment, it will use this in depth critical study of policy discourse, policymaking and policy actors, to engage with the literature of policy development theory and to reflect on whether policy theory might be advanced, addressing shortcomings of other theories to put forward an augmentation to one of the leading theories of policy development.

In form, the study begins with explaining the rationale for the theoretical concepts in policymaking, power and society, and discourse, that will provide the particular lens for viewing this policy moment. It then appraises alternative methodological approaches consistent with that lens, and sets out why the research methodology is appropriate for the task, clarifying the research questions and locating the study within the bodies of literature of research methodology, policy actor practices and policy theory that it aims to make a contribution to. The next chapter puts the 'policy moment' of study into its historical and political, social and economic context, to aid understanding of the reasons and meaning of policy discourses that form the objects of critical discourse analysis as the substantive, primary research of the study. That analysis begins, in chapter V, with examination of the HE Green Paper in 2015, progresses to explore the responses of different stakeholder policy actors in chapter VI as part of the formal consultation period, and concludes with study of the White Paper in chapter VII.

Through these chapters it will dissect the discourse used through application of the analytical categories of the Fairclough CDA Three Dimensional model, show how power has been exerted, and attempted to be exerted, by different policy actors, and chart the evolution of policy ideas through these discursal exchanges with a view to determining how the White Paper policy proposals were shaped. The final chapter, chapter VIII, aims to synthesise the findings from the study, and distil the contributions it makes to the research, practice and theoretical understanding of policy development, including showing the integration of a theoretical approach, described as the Fairclough-Bourdieu Framework for Policy Analysis, to one of the major theories of the policy process, Kingdon's Multiple Streams Approach.

Appendices, all referenced in the body of the text, have been included to assist with understanding the narrative and the application of the research methods used.

Included is an aide memoir of the principal categories of Fairclough's Three Dimensional Model of CDA; a chronology of relevant events pertaining to the period of study 2015-2016; samples of coding structures adopted for the discourse analysis in the Nvivo research software tool; an example of in depth CDA of one of the key source documents to show the level of investigation informing the conclusions; and finally, a short document, 'Power Discourse - The Policy Wonk's Guide to Influential Policy Writing', that illustrates how theoretical findings from this academic study may be packaged in an alternative form of discourse to influence practice rather than just make academic recommendations about it.

The question 'How is policy made?' appears so short and simple, yet there are few satisfactory answers to it in the research literature. This study aims to provide an answer, to explain how the most radical of policies in English HE was made and in so doing, to provide a model for how others might answer that question, in other contexts, in future research.

Chapter II: Concepts

Introduction

This chapter locates the thesis within the key bodies of literature of relevance to this study, exploring the key conceptual lenses that are to be used. It describes them, gives justification for their application to the research questions and the rationale for their selection over other lenses, and discusses aspects that may be problematic in relation to their application.

These lenses, or frames, provide a way of organizing the observed world in order to understand it. They give guidance both to how things are looked at but also what is looked at. By setting them out here it is intended that the reader is able to both appreciate the focus of the study but also the values and ontology of the author that informs it. This will enable the reader to engage their own critical faculties and be live to opportunities that may come from viewing the actions through an alternative lens.

Three bodies of conceptual literature are of significance and will be explored: 1. That relating to theories of policymaking and the rationale for adopting a critical ontology; 2. That relating to the significance of discourse in the process of policymaking, its use by policy actors and the rationale for using it as a lens to understand the wider process; and 3. That relating to the contribution of historical, social, economic and cultural context to the structuring of actions by policy actors and the rationale for using Pierre Bourdieu's concepts of fields, habitus and symbolic violence as a lens for understanding it.

These three conceptual areas are discussed in turn below, followed by a synthesising discussion which addresses some of the advantages and limitations of adopting these conceptual frames for a study such as this. It will aim to identify, in each of the three areas, opportunities for enhancement or extension of the conceptual frames. These will be explored further in the primary research and described in later chapters.

Understanding the policymaking process

Before exploring the theories of policymaking it is relevant to be clear as to what policy is. Much of the policy literature does not pause to define 'policy' but uses the term when speaking about 'public policy': government policy linked to a particular state, moving quickly to then discuss derivative themes of 'impacts', 'processes', or 'actors' (cf. papers in Fischer, F., Miller and Sidney (2007); (Jessop, 2017, 2018)) or forms of policy, such as Ball's distinction between 'policy as text' and 'policy as discourse' (Ball, 1993).

The term is however worthy of definition as 'policy' can indicate rather different types of agenda, entity or activity, with rather different forms, having relevance and applicability to very different scales of action. Even if a notion of a policy as being a text is taken, this can apply to a group, organization, region or nation, it could function at the level of guiding principles that are difficult to measure, or specific instructions to action in the form of processes or procedures that members of an

organization are expected to follow in order to comply with a policy, such as in how to claim reimbursement for business expenses.

For the purpose of this study, which uses national government higher education policy in one country as its focus, the author uses their own definition of policy which is that it is 'a national level set of objectives, principles, goals and targets that sets direction for the action of government and its agendas, influences the behaviour of a range of stakeholders and produces particular outcomes.'

Analysis of the processes of policymaking is a field that has evolved over the last seventy years, such that there are now a number of widely cited different theoretical frames that have become established in contemporary use. Whether it is the advocacy coalition framework, the multiple streams approach, or the punctuated equilibrium framework, each seeks to provide a lens to understand the way that policy is developed (Sabatier and Weible (2014); Kingdon (2014); Baumgartner (2009)). While these approaches typically now involve analysis that is critical in outlook (a term to be explored below), and a recognition of the importance of argumentation in policy development (Fischer, Frank and Gottweis, 2013) they are not all mutually compatible: it is necessary to choose a frame that best suits the research questions that are being explored. This section reviews the evolution of policy analysis, explains the theoretical framework for chosen for this study and provides a rationale for its selection.

Many reviews of the development of modern notions of policymaking (cf. Fischer, F., Miller and Sidney, 2007; Sabatier and Weible, 2014) trace its origins to the 1950s and the work of Harold Lasswell. Writing in 1951 and heavily engaged in the practice of advising politicians in the USA, Lasswell developed the concept of 'policy sciences' (Lerner and Lasswell, 1951) or to give it its fuller title 'the policy sciences of democracy' and was associated with an approach to policy analysis that represented the orthodoxy throughout the 1960s and 1970s and even continues in some more contemporary analyses (see Petridou, 2014 for a review). Lasswell's approach sought to pursue a study of policymaking in a manner akin to the natural sciences. His view was positivist and objectivist, seeking to reveal the objective truths of policymaking with which to advise politicians and policymakers. Whilst not viewing as problematic his definitions of 'democracy' or the purpose of policy sciences as being to further democracy, he advocated an analysis of policy that was unencumbered by the personal values of the political scientist. Further, he took a behaviouralist approach, believing that a study of individuals and their behaviours and actions could explain how policy was developed as opposed to giving consideration to the wider range of influences, be they societal or institutional. Policy-making was a linear process solving practical problems (Lerner and Lasswell, 1951), pursued through a number of clearly defined stages. The role of the policy scientist was to provide expert advice to the policymakers in order to facilitate better policy – the more efficient solving of selected political problems. Lasswell's approach did not concern itself with competing agendas or vested interests but appeared to assume that policy practice was as technocratic and objective in search of truth as the 'scientific' approach that he prescribed for the analyst.

Lasswell's approach to the study of policy continued to represent the academic orthodoxy throughout the 1960s, with the 'policy science for democracy' agenda

seeing strong connections between policy scientists and policymakers (Farr, 2006). By the 1970s, however, this empirical-deductive approach to the study of policy began to attract some criticism in the literature.

A Critical Policy Analysis

The behaviouralism and individualism of the policy science approach failed to identify the reasons why some questions become policy problems to be addressed and why some questions are not asked at all. As Fischer (in Durnov et al., 2015) notes, policy analysis was used for conservative political goals in the United States in the 1960s and the form of analysis therefore appeared unsatisfactory for those looking for explanations of why only certain types of policy problems and proposed solutions came forward. The focus on 'problem solving' did not recognise the ways that the definition of problems are not objectively defined but shaped through the 'discursive construction of policy problems and the struggle over the definition of problems at various stages of the policy process.' (Barbehon, in Durnov et al. (2015, p.243))

What followed was a more critical perspective on policy analysis. Fischer ((in Durnov et al., 2015, p.9) dates this to Bernstein's 1976 text *The Restructuring of Social and Political Theory* (Bernstein, 1976) that applied Habermas's critical theory to critique the positivistic approach to policy analysis and argued forcefully for the necessity of understanding the structures of power that shaped the context in which 'objective facts' were then defined.

Foucault also provides a critical theoretical foundation for the purpose of policy analysis, articulating an understanding of the power imbued in the notion of 'knowledge' (Foucault, 1991) providing also a significant influence over the development of the concept of 'discourse', as discussed below. Whilst Foucault did not explicitly support a theory for radical political purposes, others built on his notion of discourse to create new philosophy for an emancipatory agenda. Laclau and Mouffe (Laclau, 2001)) for instance combined Foucault's discourse theory and Gramsci's notion of cultural hegemony to set out an agenda for radical democracy in 1985.

The Argumentative Turn in Critical Policy Studies

The more critical approach to policy analysis was extended further through the growth of literature from the 1990s associated with the 'argumentative turn' - a form of 'post-positivism' that sought to address the shortcomings of the techno-empiricism of the post-war period and provide greater insight into the way policy was actually made. It gave emphasis to the importance of language and argumentation in the way that policy was developed and spawned a twenty-year period of 'argumentative' approaches to policy analysis (Fischer, Frank and Gottweis, 2013). This tradition rejected the notion of technical, empirical, value-neutral policymaking, and aimed to go beyond it to look at the way empirical evidence and normative statements are combined and the ways that they are used in the political, dialectical approach of policy development. It recognises the location of policymaking within human interactions mediated through a range of 'symbolically rich social and cultural contexts' (ibid.).

Fischer (in Durnov et al., 2015, p.59) also gives emphasis to the importance of power analysis in policy analysis, understanding policy as the product of an argumentative dialectic, one where an understanding of conflict in deliberation helps to understand the reasons for the outcomes, with the causes of consensus or conflict being located not simply within the empirical questions under consideration but within the wider fields of social and political structures that the policy development process is located within.

Even in argumentative policy analysis, there is however a persistence of the view that policy is about problem-solving, albeit a process in networks of actors in which consensus is sought, mediated through a range of power structures and dynamics. This study will also explore the notion that the construction, problematisation or framing of the problem may in itself be an act of a political actor (whether conscious or unconscious) where the questions under discussion are not those that are in fact being addressed; where the theatre of policy problem-solving is in fact a charade intended to serve an alternative purpose, and consensus between members of a policy community is not the end but the means to the end.

The concept of 'Policy Actors' in the understanding of policy development

This study examines policy actors – those people actively engaged in the processes of policy development – and their discourse. There is a significant body of literature that focuses on the role of policy actors within the policy development process (such as (Jenkins-Smith and Sabatier, 1994) or (Knoepfel, 2007)). If one accepts the possibility of agentive action, that individuals can make a conscious difference to outcomes, interesting perspectives are provided by Kingdon's influential model, the Multiple Streams Framework (Kingdon, 2014) [first published 1995]. Kingdon argues that when three 'streams'- policy, problems and politics- are 'coupled' during a moment of possibility that he describes as a 'policy window', then political outcomes result. In this he emphasizes the importance of what he calls 'policy entrepreneurs': 'advocates who are willing to invest their resources – time, energy, reputation, money – to promote a position in return for anticipated future gain in the form of material, purposive, or solidary benefits.' (2014, p179). Such people, he argues, can be found in many different types of organisations or roles and are normally central to the process of 'moving a subject up on the agenda and into position for enactment.'. These individuals are essential, because of the actions that they take in activating a policy issue. Whilst this study is not concerned primarily with Kingdon's framework itself, his work reinforces the importance of those engaged in policy work, that are referred to in this thesis as 'Policy Actors' in the processes of policy development, and is revisited in the concluding chapter.

Whilst this might suggest an elitist perspective on the policy development process, this is consistent with the study's focus on the discursive practices of professional policy actors and reflects, in the particular policy moment being studied, a judgement on the most influential agents, or actors, at this time. The selection of these actors is discussed in more depth in the following chapter on research methodology. It is not conceptually supposed that agentive policy actors cannot or do not come from a wider, more inclusive, base, however, but the focus is on the

sub-field of English HE policymaking 'experts' in 2015-2016, not the wider range of stakeholders holding the possibility of what Kingdon would describe as 'policy entrepreneurship'.

Fischer, in the introduction to the 'Handbook of Critical Policy Studies' (Durnov et al., 2015, p.7) provides a further explanation for why such a focus on professional policy actors is appropriate for critical policy studies, which usually adopt an emancipatory focus:

'Critics of elitist, technocratic liberalism have often focused on the specter of an oligarchy of experts while proponents have imagined a benign elite. Both views now seem naive. Experts, as Foucault has made clear, are indispensable in societies that are technologically advanced or advancing, but experts always operate within structures and relations of power... Although critical policy studies remains concerned about a ruling elite of experts, it is even more interested in the role experts play in serving or challenging established elites, whose power is at the root of democratic deficits.'

So, whilst a focus on policy actors is recognized as a valid means to understanding policy, it is necessary to consider *how* to study them. The focus on policy actors and their craft is further developed through the work of Gottweis on rhetoric in policymaking (Gottweis, 2007b, a) where he extends argumentative policy analysis to focus on the practice of policy actors in the process of policy development. Drawing on the Socratic principles of logos, pathos and ethos, whereas the objectivist analysis looks only at the application of reason and logic in the argument itself (logos), he shows that successful political communication by policy actors must also use the understanding of emotions of others and what stirs them (pathos) as well as of their personal morality and personality (ethos). In the particular policy moment of study in this paper, the opportunities for policy actors to demonstrate this fully rounded performance come principally through textual discursive exchange around the Green Paper. All three elements will be looked for.

Reintegrating the 'temporal lens' to critical analysis of the policy process

Whilst critical policy studies, in its critique of what Fischer describes as the 'technocratic project' (Fischer, Frank and Forester, 1993) has helped to uncover the ways that the definition of the 'problems' to be 'solved' was not an objective process and that the process of policymaking was one imbued with 'power and political manipulation' (Barbehon in Durnov et al., 2015, p241), it may in the process have downplayed the significance of temporal and cyclical issues in effective explanations of policymaking.

A significant part of the criticism of the 'policy-cycle' view of policymaking, with distinct linear stages, argued that policymaking did not proceed in such a simple sequential fashion (Sabatier and Weible, 2014). This led analysts to move to an approach that viewed the process of policymaking 'independently from any temporal-sequential implications' (Durnov et al., 2015, p.242). In the context of this study, and for the approach to policy development more generally, the discarding of the temporal is problematic. There is a danger that in highlighting the inadequacies of viewing policymaking as an objective process with clear stages, in

recognising the political, this mode of analysis has disregarded the way that the dialectical and discursive process of policy development actually works.

The 'argumentative turn' in policy analysis has proven extremely influential over a long period as Fischer and Gottweis have shown (2013). It is important for such an analytical approach to give consideration to the practical nature of the argument, as opposed to the abstract analysis of policy ideas that are analysed for their use of pathos, ethos, and logos, yet not reintegrated into the practice of the argument itself. In the course of any argument, the agents react to one another and to their discursual utterances, (as well as being shaped of course by the structure of power and society that they operate within). For this study policy actors selected as the subjects set out to influence the course of the policy ideas, to exert power over other policy actors and influence the outcome. It is important therefore that the chronology is understood, so that the evolution of the argument can be documented and the effectiveness of actor discursual techniques assessed.

The sequencing of the policy argument must thus be a consideration, because one actor is not able to react to another without their points in the argument having been uttered. This is an area that has received relatively little attention in the literature. Even in Fischer and Forester's 1993 seminal edited collection of essays 'The Argumentative Turn in Policy Analysis and Planning' the case study chapters exemplifying the case for 'the argumentative turn' (Hajer, 1993; Hoppe, 1993; Jennings, 1993) focus more on conceptual matters and analyses of competing policy themes. They only loosely consider the chronology of policy utterances in 'argument'. Policy narratives are created (Rein and Schön, 1993) without demonstrating that the different arguments put forward were sequenced so as to make influence of subsequent arguments possible, even before examining which of the plethora of utterances were significant in influencing others. There is thus value in a more precise consideration of the chronology of policy utterances to explain how the process of practical argumentation influences policy (if at all). Furthermore, tracing these antecedents of particular concepts, ideas, language, proposals etc., so as to assess what behaviours and techniques are effective and which are not, is an important part of the methodology of Critical Discourse Analysis that has been adopted for this study and which is discussed in depth in the following chapter.

A second temporal consideration relates to the reintegration of the 'policy stages' approach to the critical policy study adopted here. It is also important to note that whilst the community of academic policy analysts may appreciate the nuanced and discursive nature of policy development, and the fallacy of objectivist, value-free policymaking, the policymaking community; the policy actors themselves, may not. The public presentation of the policymaking process analysed in this study emphasises an open, formal and apparently pluralistic process objectively addressing known policy problems through a transparent process of consultation. Its presentation may be part of the structuring and power dynamics itself, yet the fact that policy actors persist in participating in such processes would suggest they believe those processes to have at least some value in the process of policymaking. The process shapes and sequences the policy-influencing activities that actors

follow, legitimising some kinds and some timings of contributions and delegitimising others.

An awareness that the policy-stages approach is a poor basis for an incisive analysis of how and why policy is made should not prevent the analyst from recognising the structuring influence of the policy-stage approach on the policy actors engaged in the process of policymaking.

This study will therefore take a critical, argumentative perspective on the policymaking process but will integrate within the analysis a temporal dimension: an appreciation of timing and sequencing of policy actor exchanges. As it aims to understand what effective agentive policy actor activities are, and to consider the role of policy actors in the process of practical argumentation, the study will map the chronologies of actor exchanges. It will also adopt an approach that takes note of the practical impact of policy staging (the sequencing of policy development activity) in the development of policy, as opposed to considering the policy arguments in abstraction from the realities of policy argumentation.

The significance of discourse in power and policymaking

Having established that this study will take a critical stance to the analysis of policy, it focuses on 'discourse' as its lens for understanding the processes of power within the field of policymaking. The methodology for critical analysis of such discourse is explored in detail in the following chapter, together with the critique of this methodology. At the conceptual level in this chapter, it is relevant to note why discourse analysis represents a valid and valuable concept and lens for the study of policymaking.

Discourse as a concept is used extensively across a number of disciplines, from cultural theory, social-psychology, education, policy, critical theory, sociology, linguistics and many other fields. It is seen to go beyond the notion of text or language to represent language in use and to understand the meaning of words or text. That meaning is shaped significantly by the context of the utterances, and by the purposes to which the language is put to by the user of it. Discourse, of language in use, is therefore also fundamentally about power. As Wodak and Meyer (2001, p10) note:

'Power is about relations of difference, and particularly about the effects of differences in social structures. The constant unity of language and other social matters ensures that language is entwined in social power in a number of ways: language indexes power, expresses power, is involved where there is contention over and a challenge to power. Power does not derive from language, but language can be used to challenge power, to subvert it, to alter distributions of power in the short and long term. Language provides a finely articulated means for differences in power in social hierarchical structures. Very few linguistic forms have not at some stage been pressed into the service of the expression of power by a process of syntactic or textual metaphor.

Thus, discourse is the use of language, through text, speech or other communicative behaviour, to exert power over another. Discourse can be regarded as playing a significant role in mediating reality, giving semiological significance to actions and influencing behaviours (Mills, 2004). We see and communicate the

world through discourse, so it is appropriate to consider the influence of the medium as well as the messages it conveys textually or through syntax. Alternative discourses therefore present different versions of the world. A *critical* approach to the study of discourse does not just accept as they are the observable words and texts but asks why those representations of the world have been presented and why other representations have not been.

In policy analysis the study of policy discourse is well recognised as a valuable lens through which to understand policy within the field of critical policy studies (see Winkel, 2016, p.112, for a review). Maarten Hajer describes it as 'an ensemble of ideas, concepts, and categories through which meaning is given to social and physical phenomena, and which is produced and reproduced through an identifiable set of practices'(cited in Winkel, 2016, p112). In policy practice, as most policy ends up being written as text, a great deal of policy argument is conducted in writing. Even if it is then communicated through speeches or other performances of key policy actors, the study of policy discourse is common. Further there have been many studies that have taken a critical perspective towards the discourse (cf. Jacobs, 2004; Ayers, 2005; Filippakou and Tapper, 2008; Arnott and Ozga, 2010; Leitch and Palmer, 2010; Poole, 2010; Wodak and Fairclough, 2010; Fairclough, I. and Fairclough, 2011; Green and Tucker, 2011; Fairclough, N., 2013; Diem et al., 2014; Lim, 2014).

This study aims to get behind the words themselves: to understand the interplay between structuring structures of the habitus and the agency of policy actors, to consider the semiotic significance of what is not said as well as what is, and to understand if those using forms of discourse do so consciously as part of a dialectic struggle to exert power in policymaking, or if they are shaped by the habitus and take an uncritical approach to text. It engages with the Gramscian concept of hegemony (Gramsci, 1971) to explore how elite power is sustained through discourse. An empiricist approach to analysis of policy texts would fail to reveal these layered meanings within discourse and would add little to understanding how to locate a particular policy moment within its historical context. At a practical level, one of the principal subjects of study in the thesis will be the higher education representative and mission groups – organisations created for the purpose of exerting power and having influence. The use of discourse is an important way that these organisations do their work (O'Connell, 2014) and the way that other governmental policy actors interact with them. The critical understanding of it requires an alertness to how key actors use it and for what purpose. As Bourdieu notes (Bourdieu, 1990a, p.110; 1990b):

'...To appropriate the 'sayings of the tribe' is to appropriate the power to act on the group by appropriating the power the group exerts over itself through its official language. The principle of the magical efficacy of this performative language which makes what it states, magically instituting what it says in constituent statements, does not lie, as some people think, in the language itself, but in the group that authorizes and recognizes it and, with it, authorizes and recognizes itself. '

A critical approach to discourse, consistent with the critical approach to policy study, is therefore adopted for this thesis. While all discourse forms may be of relevance to this study, the focus on discursal exchanges between government

and policy actors representing groupings of universities in the course of three stages of a policy process, means that for this study the most significant forms of discourse are written texts. These will be analysed using the methodology of Critical Discourse Analysis.

Understanding the structuring of policy action: applying Bourdieu

As discussed above, the necessity to look critically at policy development requires an understanding of the wider power structures shaping the behaviours of actors and the discourse they use. For this purpose, the study will use Pierre Bourdieu's concepts of fields, habitus, doxa, and symbolic violence. The literature on policy analysis has often seen Bourdieusian concepts applied in this way (compare Mellquist (2022); Molla (2019); (Gunter and Forrester, 2010) ; Hardy (2009); Lingard, Rawolle and Taylor (2005); Thomson (2005) for a varied range of examples of usage across the international education policy literature). This section describes Bourdieu's concepts and discusses the ways they will be applied in this study.

Fields

Bourdieu characterizes social action as being organized according to different 'fields' in which different actors struggle to appropriate different forms of capital defined as having value by the rules of the field (Bourdieu, 2013).

For the purposes of this study, English Higher education policymaking can be described as a field. The various policy actors, such as government politicians, civil servants and their agents, and the institutional mission groups, play the game of policy development and compete for policy influence, using their different forms of capital, (cultural, social, symbolic, economic). They do so in an environment governed by the rules of policy development (the *nomos*) and adhering, in their practices, to the *doxa* of the field in terms of the making contributions to the policymaking process in accordance with accepted ways of behaving, with accepted forms and topics of questioning, and accepted forms of discourse. As 'players in the game' of policy development, they recognize and strive to maximise their interests, acknowledging what they must invest to promote them (the *illusio*). Their principles and strategies for operating within the field shape and are shaped by the norms of behaviour, or *doxa*. These serve both to sustain their own patterns of behaviour and to protect their interests from attack from others outside the field, the *habitus*. These characteristics can be seen in the ways that policy actors behave and the discourse they use and do not use, in writing and in speech.

Habitus in English HE Policy Development

Bourdieu argues that behaviours of individuals in a field, the things they do and the things that they do not do, are shaped in part by what he calls its 'habitus'. This he describes as:

'...systems of durable, transposable dispositions, structured structures predisposed to function as structuring structures, that is, as principles which generate and organize practices and representations that can be objectively adapted to their outcomes without presupposing a conscious aiming at ends or an express mastery of the operations necessary in order to attain them'

(Bourdieu, 1990b, p.53).

Thus, it is not necessary for actors to be pursuing a conscious goal, or to understand the way that they are structured by the habitus. He goes on:

'...The practical world that is constituted in the relationship with the habitus, acting as a system of cognitive and motivating structures, is a world of already realized ends, procedures to follow, paths to take - and of objects endowed with a 'permanent teleological character', in Husserl's phrase, tools or institutions.'

(ibid, p.54)

Of relevance to this study, he argues that even in environments where there is apparent free choice and unbounded possibility, the habitus functions to see that certain questions never become issues to be solved by policy. Furthermore, in sustaining itself, through absorbing actors into, or developing within, a field, the habitus creates rules for itself, observed as 'common sense' and unquestioned, that serve to ensure that whilst there may be the appearance of plurality of possibilities in policy direction, the methods and norms of the habitus do not allow its fundamentals to be challenged. As Bourdieu says:

'The very conditions of production of the habitus, a virtue made of necessity, mean that the anticipations it generates tend to ignore the restriction to which the validity of calculation of probabilities is subordinated, namely that the experimental conditions should not have been modified,...' (1990b, p.58)

'...One of the fundamental effects of the harmony between practical sense and objectified meaning (sens) is the production of a common-sense world, whose immediate self-evidence is accompanied by the objectivity provided by consensus on the meaning of practices and the world, in other words the harmonization of the agents' experiences and the constant reinforcement each of them receives from expression - individual or collective (in festivals, for example), improvised or programmed (commonplaces, sayings) - of similar or identical experiences. '

And...

'The practices of the members of the same group or, in a differentiated society, the same class, are always more and better harmonized than the agents know or wish,...' (ibid., p.59)

The habitus within a field thus becomes sustained by the accepted practices within that field, bestowing on those able to practice expertly, a power and recognition that enables them to continue to dominate, sustaining the habitus, but also sustaining norms of practice without the conscious knowledge of the actors themselves. Bourdieu talks of actors within a field being imbued by the habitus with 'practical sense'. 'Practical sense, social necessity turned into nature, converted into motor schemes and body automatisms, is what causes practices, in and through what makes them obscure to the eyes of their producers, to be sensible, that is, informed by a common sense. It is because agents never know completely what they are doing that what they do has more sense than they know.' (Bourdieu, 1990a, p.65)

Bourdieu's theoretical concepts of the connection between structure and agency, of conscious or unconscious actors, and of conditions of radical or incremental shift, are also things that will be explored empirically in this study, in the field of English

HE policymaking. The notion of habitus will also help to comprehend the conditions that create and sustain a particular order and the ways that it is sustained. With habitus, Bourdieu leans towards a Foucauldian view of the genealogy of social structuring, emphasising the conformity to the habitus. The interesting factor is the extension of this into HE Privatisation: whether this represents change consistent or inconsistent with the habitus, and the way such changes are brought about.

Does New Public Management in English HE represent an incremental sedimentation of the doxa of the meta-field of neo-liberalism, a habitus that reinvents itself for its teleological purpose in sustaining capitalism? Or is it a staging post towards a state of its final realization, to the extent that there is no notion of 'the public' when ownership and control is ceded to the private sector? Does this view itself represent an over-simplistic focus on the importance of the economic, the 'base', when Gramscian notions of cultural hegemony and Bourdieu's habitus show that other forms of social capital are equally important in sustaining a habitus, where the principles of action followed unthinkingly by supposedly influential actors, serve to sustain the interests of private capital? It may be that the shift from New Public Management to HE Privatisation can be conceptualized as both a radical major event **and** an incremental reinforcement of the habitus, and not necessarily a paradigm to be overturned (in a Kuhnian sense) **or** a feature of a consistent incrementalism.

Relations between fields and field hierarchies

One alternative approach to applying Bourdieu and resolving the dilemma of what produces major or radical societal change is to consider the notion of fields as interacting with each other and of being layered; i.e., with different fields operating at different levels, some within others, as sub-fields of the large fields – with HE policy being a sub-field of 'public policy' for instance. Bourdieu describes fields as 'games' (1990a, p.61) and socialisation into the habitus as being akin to 'what sports players call a feel for the game, [the] practical mastery of the logic or of the immanent necessity of a game - a mastery acquired by experience of the game, and one which works outside conscious control and discourse...'. .

It is possible that games play out at different levels from the micro to the macro, with play on one game board affecting play on another. Thus, it may be possible to use the concept of habitus to describe the groundwork of a macro-level neo-liberal habitus that moves consistently towards a privatisation of everything, whilst at a meso-level see that some aspects of practice within a field serve to frustrate the purposes of the wider field. Watson and Widin (2015, p.659) reach similar conclusions in their analysis of how the field of HE 'is both dominating and dominated within the broader national and international fields of power, and is itself a contested, uneven space.'. Further they too apply Bourdieu's concept of the field to consider the way different mission groups emerge as sub-field of UK HE (ibid., p661)

Watson & Widin (ibid., p.669) conclude that 'fields are interrelated, and major financial, political or external events, such as...the restructuring of funding in the UK sector, can generate fundamental shifts in the logic of practice which lead to periods of major transformation and reordering of legitimate processes.'. This

perspective is shared by Bathmaker (2015) who argues that in English HE, rapid and significant change is the result of an increasing heteronomy of the field and a more porous boundary between fields. It is argued here that, whilst agreeing that fields are interrelated, the conditions of shock that reorder the logics of practice are not easy to shift. They require not just economic conditions at the macro level of the national and global economy but other actions at the micro-level of discourse and policy development.

'The habitus is the principle of a perception of the indices tending to confirm and reinforce it rather than transform it, a matrix generating responses adapted in advance to all objective conditions identical to or homologous with the (past) conditions of its production; it adjusts itself to a probable future which it anticipates and helps to bring about because it reads it directly in the present of the presumed world, the only one it can ever know. It is thus the basis of what Marx (1975: 378) calls 'effective demand' (as opposed to 'demand without effect', based on need and desire), a realistic relation to what is possible, founded on and therefore limited by power. This disposition, always marked by its (social) conditions of acquisition and realization, tends to adjust to the objective chances of satisfying need or desire, inclining agents to 'cut their coats according to their cloth', and so to become the accomplices of the processes that tend to make the probable a reality. '(Bourdieu, 1990b, p.64-65)

Furthermore, in considering the question of paradigm shift or continuity, of why aspects of NPM are dismantled in the creation of HE Privatisation, the concept of fields and field hierarchies are useful. Each field is sustained by its habitus, but the domains of each field will overlap, leading in some cases to conflict in the habituses of each. In other cases, one field can be regarded as a 'sub-field' of another. In such cases it is possible to adopt an analysis that looks at the doxa of each field and explore if the one begins to challenge the other as the habitus of each evolves. The evolution of the habituses of the sub- and meta-fields do not necessarily occur fluidly as a biological whole. Just as the habitus of a field is often regarded as being formed by 'sedimentation' so too might we think also of it being sustained by 'encrustation', creating an outer crust, or solidity, to the norms and elites of a sub-field that sustains it even when it is not aligned with the meta-field. Thus teleologically, in order to realise a goal in a wider field, a sub-field may establish some aspects of its habitus that function counter to the requirements of the wider field.

The conditions that are made possible by sedimentation over time and are sustained by and sustain play in one field and make possible an evolution at the macro level to a more advanced stage of neo-liberalism, in themselves begin to frustrate play in the wider field and must then be broken. For this study, such concepts of field hierarchies, and challenges to or shifts in the habitus, the challenges to the doxa, and the elite actors, will be explored through detailed analysis of the discourse of the principal actors, as discussed in the next chapter.

[The field of English HE policymaking and its doxa](#)

Bourdieu identifies the beliefs and values unquestionably held within a field as its 'doxa'. For in 2015, there are a number of such beliefs that can be seen to be commonly held across the university representative organisations studied in chapter VI and by the principal agents of Government in the field, the HEFCE. These

are important to consider when examining the discourse of both Government and professional policy actors in stakeholder organisations to identify where things are taken as 'common sense' and should thus be subject to closer scrutiny. Significant doxa of the field are:

- A. The participation of those under-represented in HE in relation to their representation in broader society should be widened so that all groups participate equally
- B. It is legitimate for universities to have to justify their contribution to society, economy and community in exchange for the funding they receive
- C. Those providing funding towards something in HE have a legitimate interest in its quality and outcomes and should be able to appeal to a higher power if they have a complaint about a particular university and its offer.
- D. Universities can, and should, aim to positively impact the economy through supporting the creation of new knowledge-intensive organisations and the improvement of productivity and innovation through services to businesses and other organisations
- E. Competition between individuals and institutions is a normal and healthy way of organising, distributing resources and motivating actors

It is also important to note that the field is not a single homogenous, stable, collective of actors but is characterised by and shaped through a 'permanent conflict' (Naidoo, 2004, p.459). Different policy actors pursue different strategies to achieve their aims, taking what Bourdieu describes as different 'position' (Bourdieu, 1993). This has the effect that the field and its rules and doxa are constantly evolving and, at points of radical and significant change As such, they may, in response to a common habitus, take different positions within it . Different actors will also be differently affected by the extent of heteronomy of the field and the degree to which they see benefit in an autonomous or heteronomous positioning for their particular interest group; the product both of structure and agency (Marginson, 2008) Thus the doxa and the different positions taken in respect to the habitus by different stakeholder groups are explored in chapter VI.

Symbolic power and Symbolic violence

Bourdieu's concept of symbolic power, the power to convey meaning, has been significant in explaining power struggle in society, offering a more nuanced perspective to a structural Marxist one that considers only economic power. That is not to say that Bourdieu regards economic power as unimportant. Indeed, with reference to economic power, he *defines symbolic power as:*

'Symbolic power: a subordinate power, is a transformed, i.e. misrecognizable, transfigured and legitimated form of the other forms of power...in particular the labour of dissimulation and transfiguration (in a word, of euphemization) which secures a real transubstantiation of the relations of power by **rendering recognizable and misrecognizable the violence they objectively contain and thus by transforming them into symbolic power, capable of producing real effects without any apparent expenditure of energy.**' [author's emphasis] (Bourdieu, 1991, p.170)

For this study, the notion of symbolic capital is valuable in considering policy development and its discourse. A purely economic consideration of policy actors and their motivations might reduce considerations of the Green Paper proposals to financial considerations of whether an institution or group of institutions represented by a Mission Group were to benefit financially. Mission Groups do not respond entirely in this way. When considering the reasons why they do not; why, in an economic consideration they do not operate in their own self-interest, one might consider not just economic capital that is at play but also symbolic capital. Symbolic capital is the other signifiers, cultural indicators, calls to religion, belief, honour, or the doxa of the field. In this case, the notion of symbolic capital can help understand the calls made in the discourse, the discourse technologies, that bring the policy community, the consumer of the text, 'on-side' by calling to their non-economic as well as their economic priorities. Bourdieu describes this symbolic capital as 'misrecognised economic capital'(Bourdieu, 1990b, p.127). Such is the significance of this symbolic power within society, he argues, 'In an economy which is defined by the refusal to recognise the 'objective' truth of 'economic' practices, that is, the law of 'naked self-interest' and egoistic calculation, even 'economic' capital cannot act unless it succeeds in being recognized through a conversion that can render unrecognizable the true principle of its efficacy.'(Bourdieu, 1990b, p.118)

The concept of 'misrecognition' 'relates to the ways...(that) underlying processes and generating structures of fields are not consciously acknowledged in terms of the social differentiation they perpetuate, often in the name of democracy and equality.' (Grenfell, 1998, p.23) It is an important one in understanding the responses of different policy actors to the habitus of an increasingly heteronomous field. 'The participants do not conceal a practice by dressing it up as something else (in the sense of disguising it), but rather render it invisible through a displacement of understanding and a reconstrual as part of other aspects of the habitus that 'go without saying' (Harker, Mahar and Wilkes, 2016). In the Green Paper for instance, the commitment to 'widening participation' within the text, is a term or notion that in English HE carries a great deal of symbolic capital, with few prepared to speak against it from any part of the political spectrum. Its use, even by Government political actors with a history and interest in sustaining an elite social order and levels of inequality, can cause readers to misrecognize the intentions of Government and welcome its discourse of widening participation as opposed to question it critically. This is true both in responses that are shared across different actors in the field but also in different ways, depending on their position taking in the field.

The application of symbolic power and the misrecognition by those actors in the field of the economic power it conceals, is central to another of Bourdieu's concepts: that of symbolic violence. Symbolic violence are 'acts of violence that aim to constrain and subordinate, but which are simultaneously highly symbolic because they are achieved indirectly and without overt force.'(Tomlinson, Enders and Naidoo, 2018). For Bourdieu 'the strategies of symbolic violence are often ultimately more economical than pure "economic" violence (Bourdieu, 1977, p.190).

To apply these concepts in the field of English HE in 2015, the place of policy debate that took place around the economic; the debate around the levels of fee that could be charged by providers of education to consumers of it, had proven problematic throughout the previous decade. It nearly saw the end of the Blair Government (with a bill passed by only one vote in the House of Commons) and was totemic in its destruction of the Liberal Democrats in the introduction of tuition fees at £9000 per year for full time students at the start of the Coalition Government with the Conservatives in 2010. Far more likely to succeed would be to exercise economic power through symbolic power, drawing in the complicity of actors familiar with the habitus and doxa of the English HE field, in an act of symbolic, as opposed to economic violence. This could be expressed through the obfuscating potentialities of discourse technologies employed in the Green Paper. Thus, the Green Paper drew on the discourse of widening participation and included a narrative of inclusiveness and 'equality-washing' through the inclusion speculative measures around Shariah Banking, later abandoned. An appreciation of these elements of symbolic capital in the contextualisation of this study will help to analyse the Green Paper's discourse, signalling the potential for symbolic violence offered by the sustaining of a number of themes in the run up to the Green Paper.

One might argue that this gives credence to the view that the NPM period, the field of HE policymaking in England and its habitus, represented part of a continuity of the meta-field (of neo-liberal society and economics) even if the symbolic violence was done at the moment of the Green Paper, drawing on symbolic capital in order to move HE policy to a new paradigm, with new members and doxa. In other words, the symbolic violence done by the social group of neo-liberalists upon the academic or university group was presented as being legitimate and dressed in the clothes of the habitus of NPM policy development, yet it represented a more significant shift in the logic of practice.

The notion of symbolic violence will therefore be used, following close critical study of the discourse of the Green Paper and policy actor responses in later chapters, to conceptualise the discourse of Government and its effects. Chapter VI reviews returns to the question of what 'misrecognitions' were seen amongst the responses from stakeholder groups in order that their necessary complicity to the symbolic violence was secured.

Resolving theoretical dilemmas from a critical ontology

One area that has proven conceptually problematic in relation to the explanatory value of the frames adopted is that of accounting for why and at what point significant, radical, shifts in policy occur: are they the product of an incremental drift or a violent paradigm change? As Hogan and Howlett note (2015, p.11) 'Determining the exact contours of a paradigm and the forces which lead it to be influential, and to change, ...represents a new and ongoing area of research in this field.'

Bourdieu's concepts of frame, habitus and doxa, explain effectively the way that a dominant ideology of neo-liberalism is sedimented into the fabric of society and how its values and discourse become established as unquestioned 'common sense'. The concept of symbolic violence shows how the conditions are readied to

manufacture support for a change that might have been regarded as contrary to the interests of the supporters. What had remained conceptually problematic was how to recognize what is a 'major' or 'radical' policy change, how to explain why such a shift occurs and how to explain how it occurs.

The contention in this study is that the proposals regarding private profit-making within the Green Paper represents such a significant change as to justify the label 'major' or 'radical'. The question is important for it helps to explain how major (as opposed to incremental) policy change occurs or is brought about. But if the change is not actually 'major' the value of the conceptual and methodological conclusions of this study to understanding other policy changes that are regarded as 'radical' or 'major' would be more limited. There are a number of elements to explore.

First, the contention that the Green Paper proposals were radical, whilst evidenced in later chapters, must be recognized as having been formed from within the habitus of the field of academic enquiry in social sciences in an English university. Higher Education in the four nations of the UK has been relatively insulated from the increasing privatization prevalent across the public realm in England. Even for a critical academic this may mean that a change regarded as radical from within the field of English higher education is, when considered as part of the wider field of public-policy, not major or radical: private for-profit organisations have long been permitted access to provide medical services to the NHS, to run prisons, probation services, essential services provided by local authorities, energy, water, communications, infrastructure, railways, military and defence. The taking of profit from providing higher education in this instance may be significant and major for higher education in a UK (and indeed a European) context, yet might more accurately be characterized as an incremental step in the field of public policy.

If it is accepted that the Green Paper does represent a radical change, what conceptual frame can help to explain the reasons for it? Is Bourdieu, a critical orientation on policy study, and an argumentative analysis of policy actors and their discourse, sufficient, or are other frames required to augment the conceptual structuring?

One attempt at theoretical augmentation is to look to incorporate theories of revolutionary or radical change. At a social theory level, Kuhn's concept of paradigm shift (Kuhn, 1962) explains, with reference to scientific communities and paradigms, long periods of stasis and the establishment of a paradigm, followed by a short period of revolutionary upheaval before a new paradigm begins to stabilize. Similarly, from policy theory, Baumgartner and Jones' punctuated equilibrium theory (Baumgartner, 2009) conceptualizes policy change as characterized by long periods of stasis or small incremental change 'punctuated' by short major policy shifts. As Howlett & Rayner (2006, p12) note:

'In the policy realm, punctuated equilibrium describes a situation whereby normal policymaking involves fairly common, routine, non-innovative changes at the margin of existing policies utilizing existing policy processes, institutions, and regimes. Atypical, paradigmatic or non-incremental change then involves new policies which represent a sharp break from how policies were developed, conceived, and implemented in the past but are still rooted in the same general concerns and problems' (author's emphasis)

Kuhn and Baumgartner & Jones' theories do not perhaps add that much to Bourdieusian analysis. They appear consistent with Bourdieu's notion of incremental use of social, economic and cultural capital in the establishment and sustaining of the habitus of a field. Bourdieu appears however to be more effective in demonstrating how at a macro-level, incremental drifts *and* major shifts all typically move in the same neo-liberal direction, structuring and structured by a purpose of sustaining neo-liberal capitalism, taking, rhizome-like, ever stronger and more effective control over all aspects of life.

Indeed, Bourdieu addresses a similar issue in consideration of the circumstances of the civil unrest in the events of May 1968 in France in *Homo Academicus*. For the purpose of this study this deals successfully with both the issue of correctly labelling something as 'radical' change and for that 'revolutionary' period that he refers to as 'The Critical Moment'. He concludes that:

'Those who pay instant attention to the instant, which, drowned in the event and the emotions it arouses, isolates the critical moment, and thus constitutes it as a totality containing within itself its own explanation, introduce thereby a philosophy of history: they tend to presuppose that there are in history moments which are privileged, in some way more historical than others...The scientific *ambition*, on the other hand, aims to reinsert the extraordinary event into the series of ordinary events within which it finds its explanation. It does so in order to further examine how to locate the singularity of what remains a moment like any other in the historical series, as we can clearly see with all threshold phenomena, qualitative leaps where the continuous addition of ordinary events leads to a singular, extraordinary instant.

Being an intersection of several partly autonomous series of events arising in several fields pregnant with their own specific determinants, a crisis like that of May 1968 – and no doubt any crisis – introduces a visible break in relation to what produced it, although we cannot comprehend it without restoring it to its place in the series of preceding events.' (Bourdieu, 1988, pp160-161)

Thus, for this study it is taken as sufficient that the location of the author within a particular habitus is acknowledged, and that whilst many would regard the Green Paper proposals as radical and major, this is less important than revealing the conditions facilitating the change and the agentic actions of policy actors engaged in the 'game' of policy development. Furthermore, the study will continue to apply, without augmentation, a Bourdieusian analysis to explain and understand the way that, across a range of fields and sub-fields, conditions were right for the changes that occurred, and to show how the habitus of the field of HE policy development in England, including the actions of policy actors operating within it, facilitated the development of the change produced, regardless of whether others regard this, as the author does, as a radical change.

Conclusions and conceptual frames for this study

This chapter has located the study within the conceptual literature and set out the reasons for selecting the approach taken. A critical approach will be taken to the study of the policymaking process. It will focus in depth on key policy actors and the discourses they use in the course of a dialectical argumentative process framed for the actors by a staged approach to policy development. In contrast to many studies in the argumentative tradition, attention will be given to the chronology of

discoursal exchanges between these actors in order to understand its contribution to the practice of argumentation.

The close analysis of the discourse of policy actors will be complemented by an appreciation of the fields of practice in the 'game' of policy development and the ways that play by policy actors on one board and in one field will affect that in others, with some fields operating as sub-fields of others. The habitus of the HE policy development field will be uncovered, its doxa documented, and the ways that leading policy actors ('elite' actors that are the subject of the study) sustain the habitus through their behaviours. In understanding the structuring of the field over time, the concept of symbolic violence will be used to help explain the ways that the sedimentation of doxa and power relations in the habitus facilitated a radical shift in English HE policy.

Bourdieu's concept of habitus has been applied to generate critical awareness of the author and the habitus of the field of academic research from which he is located. It is also applied to resolve the theoretical dilemma of how to characterize the 'major event' of the Green Paper, which may have been regarded as paradigm-changing, and locate it within a longer-term historical understanding. This resolution has also aligned issues of structure and agency and recognized an alignment between Bourdieu and Kingdon's Multiple Streams Approach of policy change.

This combination of conceptual frames enables this study to suitably address its research questions. It enables it to navigate the issues of structure and agency and provide a basis for critical understanding of the way that policy is developed, and the way policy actors use discourse to influence policy. The discussion of conceptual frames in this chapter has revealed certain requirements for the study in respect to the research methodologies and methods that will be employed in analysis of the primary data. These are discussed in the next chapter.

Chapter III: Methodology

Introduction

This thesis addresses four research questions and aims to make an academic contribution in three fields: the theory of policy development; the practice of policy actors; and the sociology of policy power relations. The four research questions are:

1. How can critical analysis of discourse be used to understand the process of policymaking?
2. How do policy actors use discourse and to what effect?
3. What factors shape policy formulation and decision-making in public policy?
4. Why was the UK Government able to propose policy reforms embodied in the 2016 White Paper that empowered and advantaged private profit-making providers and why did English public universities not successfully resist?

The study is informed by the theoretical perspectives provided by Bourdieu and the field of critical, argumentative, policy studies. It analyses written discourse in the form of Government policy documents and the formal responses by selected policy actors.

This chapter explains the way that the study makes this contribution; the focus of the analysis; and the methodology and research methods that will be employed. It begins with defining the focus of the study and the way it will be limited in its breadth. This is followed by an explanation and justification of the methodology of Critical Discourse Analysis that will be used to analyse the written discourse of the policy actors. It goes on to explain the method for selection of the written texts and concludes with a review of the literature critiquing the methodological approaches taken and the responses to this critique and methodological adaptations made in the study to address valid areas of concern.

Defining the focus of the study

Whilst findings are to be developed in this study that are intended for wider application in the theory, practice and sociology of public policymaking, these findings are to be exemplified in a narrower set of case studies and context in order to do justice to the complexity of the situation in question. There are six conditions that will limit the scope of the study: field, geography, timespan, policy area, actor subjects selected, and forms of discourse.

The first of these is geography. The study examines policy developed in a single country and governmental jurisdiction: England. A number of researchers have commented on the international trend towards institutional isomorphism in higher education (Hüther and Krücken, 2016), a trend fuelled by international league tables ((O'Connell, 2014) in which UK (and US) universities feature disproportionately. Within the UK, higher education has been a devolved responsibility to the governmental institutions of the four nations of Scotland, Wales, Northern Ireland and England, since the early part of the twenty-first century, yet the English HE system has had the most significant impact on HE

developments across the four nations. It is the largest HE sector (either by student numbers, number of providers or income) within the UK, by a significant margin. As students have had free movement within the UK over where they choose to study, there has also been a market in operation in relation to the recruitment of students, with market conditions significantly influenced by the scale of the English market vis a vis the other three territories. Student mobility and the market for recruitment also arguably applies across the European Union, but the largest flows have been UK to UK (Riddell, 2016, p71) The presence and size of this market for students has produced some institutional isomorphism and an increased significance of the English system over developments in the wider UK, This has been despite the gradual development of distinctive HE policies in Wales and Scotland particularly in relation to fees, and with respect to the market and the role of private profit-making providers, where Scottish and Welsh policy makers have been less keen to make the move to HE Privatisation than those in England.

This study will not attempt to explain the development of devolved UK HE policy in the context of drivers of global isomorphism, but to note only that whilst there are many similarities, the power dynamics within each of the four nations of the UK are sufficiently different to make a detailed study of the UK unwieldy. The English system has been selected therefore, as the most significant internationally and within the UK, most interesting in terms of the radical change in HE policy to be understood, and most developed as a functioning field of public policy in higher education, having been in place far longer than the other devolved systems.

The second focusing limitation for the study relates to the time period to be studied. The study will examine only the discursive policy exchanges between Government and other selected policy actors during the period 2015-2016. The nature of discourse analysis requires close attention to texts and their contexts. The depth of analysis is required to support the findings to be drawn from it. This period covers an extremely important stage of the policy development process – from the first publication by Government of initial policy proposals in the form of a Green Paper, through the responses by policy actors operating within the field of HE policy influence, to the Government's concluding policy proposals in the form of a White Paper of finalized policy. This is the stage in the public process where stakeholders are given greatest public, formal opportunity to provide evidence, ideas and argument. It is a process intended to promote a view of policy development as the posing of questions to pressing policy questions to be 'solved' through the problem-solving efforts of a disinterested but expert community of stakeholders invited to contribute to policy development.

As noted in the previous chapter, the actual way that policy is developed is rarely linear, even if it is presented as such. It would be of academic value to continue to explore the discourse of Government and policy actors as a piece of policy progresses further through the process, from White Paper to drafting of legislation; through legislative debate to confirmation of policy in an Act of Parliament. It may be possible to understand if the nature of discursive exchange changes, as (and if) the dialectic moves from ideational to legal. It may also be possible to reveal alternative policy actor strategies and to analyse how these may be changed by the movement to the alternative sub-fields of Parliamentary debate and civil service

legislative drafting. This is however beyond the scope of this study, which will remain focused on the stage of the policy development process where ideational debate is formally encouraged: the publication of the Green Paper through to the publication of the White Paper.

The third aspect focusing the study is the selection of policy actors that will be the object of analysis. This study will focus on Government policymakers, the national membership organisations representing higher education providers and their key officers. This is a significant narrowing from the totality of those who have a stake in HE policy.

There were over 600 written responses to the Green Paper consultation received by Government, from individuals and organisations, universities, non-higher education bodies including trade unions and students' unions, private sector bodies. Even these do not even represent the totality of people or organisations with an interest in HE policy changes, but those sufficiently attuned with the habitus of HE policy development to feel confident and able to express their views through the formal, written, consultation mechanism. Nor does the focus on Government and the representative bodies of institutions capture the influence of individuals or organisations who may be attuned to the habitus of the sub-field but exert influence over HE policy in other ways and do not choose to participate in the public consultations. Those other methods may involve other forms of discourse within the sub-field, through conversation at private meetings or social events, or other forms of semiological action that contribute to the habitus and indirectly to the shaping of policy (such as political donations or gameplay within a different dominant field, such as HM Government Treasury policy, that may have a structuring effect on the habitus and discourse within the sub-field of HE policymaking. On the Government policy actors, a focus on those known to be associated with the development of policy proposals does not investigate the influence of those whose action is less visible, particularly in the political sphere of cabinet government.

The focus of this study is however on policy actors who specialize in the development or influence of higher education policy and the discourse they use to do so. On the Governmental side this focuses on the politicians and civil servants most closely connected with the drafting and leadership of the policy developments. In respect to other policy actors, it is those organisations representing groups of higher education providers that are the focus of this study. As will be shown later in this chapter, these organisations; so-called 'Mission Groups' and representative bodies, exist to a large part for the purposes of influencing policy development and implementation in the interests of their members. It would be reasonable to expect that these organisations have an influence over the direction of policy, not least because their members pay subscriptions on the expectation that they will do so. As professional HE policy actors, they should be expert in their use of discourse and so present a reasonable way of identifying actors likely to be worthy of study in order to understand what effective discourse is. Given that there are questions about the very possibility of agentive policy action, vis a vis the significance of the habitus and structure, and the potential that contribution to the techno-empirical process of staged policy

development (promoted to policy actors as the way that policy is actually developed) may well not actually have any influence over Government policy, it again seems sensible to focus on actors that might be expected to be able to produce agentive action: to influence policy. The focus on particular policy actors is therefore a further limitation to this study.

The study is also limited in the forms of discourse that it will examine. As noted in the last chapter, the term discourse is used to indicate any spoken or written communication that transmits meaning. There are many different spoken and written communicative acts even from the selected policy actors. In 2016, policy actors in England may contribute using text on a variety of social media platforms, such as Twitter or Facebook, and may write blog publications on special interest professional websites, such as LinkedIn groups or the HE policy hub WonkHE.co.uk. Were it possible to obtain access to them, there is likely to be considerable written discourse in private text messages and emails. Finally, the process of policy drafting and of shaping responses to policy is often shaped by internal papers developed for the purpose of exploring policy options, or position papers and options analyses developed by policy professionals in representative organizations to put before the members, to be selected. Whilst advances in data science such as Natural Language Processing engines, may facilitate rapid basic analysis of large corpora of discourse, the analysis of the totality of written discourse of even the limited number of policy actors examined in this study is beyond the scope of what is feasible.

In relation to discourse as text therefore, the focus of the study has been on the final published texts, either from Government or the Mission Groups and representative bodies, and not the working documents that preceded and shaped the discourse used in the published texts. The study is also interested in the degree to which the 'visible' policy dialectic performed through the published staged policy process, appears influential in shaping policy or not, allowing inferences to be drawn as to the value of participation in such processes. Thus, the informal communications are of less relevance to this particular study. This is not to say that no attention will be paid to discourse beyond the documents of study: the methodology of Critical Discourse Analysis employed will require that inter-textual and inter-discursive connections are mapped and their impacts considered. The discourse can only be properly understood when considered in the social context in which it was produced. It is only that such other forms of discourse do not constitute such a significant contribution to the central research questions.

A final constraint in the focus of the detailed research for this study is in its focus on a particular field: that of HE policy development in England. This will provide the locus for the discourse analysis and actors and the detailed consideration of the evolution of the habitus of this field. As part of this discussion, (in chapter IV), consideration will be given to the field hierarchies and inter-field dynamics, but from the perspective of the field of English HE policy development. This will provide a sufficient understanding of the contours of the field to enable the power dynamics and impact of discourse to be adequately understood.

Critical Discourse Analysis as Methodology

In seeking to identify the most suitable methodology for this study, consideration was given to a number of factors. This study seeks to understand the agency of those actors and the conditions that shape it. It follows a theory of policy development that demonstrates that policymaking is a process of argumentation, where actors will use all kinds of means to exert their view in the argument, yet where it is evident that some questions are never asked and some answers never proposed as solutions. Empiricist studies of policymaking have typically not revealed the real forces shaping policy and proved of poor value to policy practitioners or students (Jann and Wegrich, 2007). Neo-liberal capitalism has continued to extend its reach in the formerly public sphere of higher education over a period of (in the UK) over thirty years, a factor unaccounted for if a singularly narrow study of policy process were conducted. The study also examines discourse. Discourse is not simply text or words, but the way they are used to produce meaning; that which is formed by the social conditions of its production and its relationships with other forms of discourse: past, current and future.

Alternative Methodologies Explored

A number of other methodologies for the study were considered before selecting Critical Discourse Analysis: Critical Policy Ethnography (see Dubois (2015) for a review of the methodological literature), analysis of policymaking through the Multiple Streams Approach (Kingdon, 2014), and a quantitative study of discourse in texts using Quantitative Corpus Linguistics (see Kennedy, G. (1998); Gries (2009); Weisser (2016) . These are critically reviewed below in relation to their suitability to the aims of the study.

Critical Policy Ethnography

The first of the alternative methodologies considered was Critical Policy Ethnography. It shares with CDA a focus on power relations and an alertness to the activities of elites in domination of others. The methodology involves extensive data collection gathered from close observation of policy actors and interviews with them. It enables the analyst to gain an in depth understanding of the lives of policy actors, their activities, relationships and emotions to construct theoretically-informed narratives of activity. The approach has not been adopted for this study for two reasons, both essentially focused on issues of the inefficiency of the method for addressing the research questions: ethnography gathers rich and extensive data about all aspects of the lives of a small number of subjects, covering all aspects of their life and the environments that they live and work within. This study is focused only on the use of discourse in the professional activities of policy actors and in revealing the forces that shape policy in a stage of a formal process, less on the lives of those policy actors and the full spectrum of their activities. The breadth and richness of the data would mean, in the course of a doctoral thesis, that less time could be spent on the analysis of their discourse or less policy actors could be studied. If conducted a great deal of the data gathered would also be superfluous to the research questions. This would limit the ability to draw theoretical or methodological conclusions from the smaller number of subjects that could be studied and would not of course make a contribution to understanding of how CDA can help to explain the process of policymaking. The second reason is a

practical one: critical policy ethnography involves spending a significant amount of time with the subjects of study. This is a methodology that cannot be accommodated by the study's author with other work commitments. So, whilst ethnography potentially has utility in combination with CDA, the methods for which are discussed in the section at the end of this chapter, the study has not adopted ethnography as its principal methodology and other means for gathering some of the insights of ethnography have been incorporated into the methodology applied.

Multiple Streams Approach

The second methodology considered but not adopted was the use of Kingdon's Multiple Streams Approach, discussed in the last chapter. This widely applied policy analysis methodology (Cairney, P and Jones (2016); Reardon (2018)) creates a classification for identifying the conditions that must be present for something to become a policy issue, to be problematized, and progressed through to implementation. It has the advantage of considering activity in a range of areas simultaneously, and addresses questions of agency effectively, with a focus on 'policy entrepreneurs' that must be present, and a body of further literature (cf. examples in Cairney, Paul (2018); (Cairney, Paul, 2021)) examining their behaviour and the examples of their role in coordinating action across streams. The study could have looked at the same stage of the English HE policy from Green to White papers and considered what activity was occurring in each of the streams. There could be a practical contribution in the form of describing the actions that policy entrepreneurs (actors) undertook, and a theoretical contribution, testing the suitability of MSA for explaining why policy is made and how it is made.

MSA does however have some shortcomings in relation to its applicability for this study. It does not have the same explanatory power for revealing the way structure and the sedimentation of the habitus of policymaking allows very radical changes to occur. It is similarly not as critical, without an explanatory capacity for the consistency of policymaking in neo-liberal directions, with a value-laden assumption that policy actors and politicians are engaged in activity to solve problems through policy, rather than pursuing other agendas only tangentially linked to the policies in question. Finally, the approach assumes the presence and significance of agency, rather than exploring critically the reflexive connection between structure and agency and the conditions that mean actors do not choose to assert their own agency or act in ways that produce homogenous as opposed to heterogenous policy ideas. This methodology has therefore not been applied, but notions and identified actions of policy entrepreneurship will be considered when looking at the specific actions of policy actors. Furthermore, efforts are made to assimilate the Multiple Streams Approach with the methodology applied in this study in the concluding chapter of this thesis.

Quantitative Corpus Linguistics

The final alternative methodology considered was that of Quantitative Corpus Linguistics. Corpus Linguistics has seen significant advances supported by the increased computer processor power and software available to the researcher at their desktop (as opposed to in specialist 'high power' computing facilities). This has produced the ability for researchers to analyse very large bodies of text and use computing power to search for and identify patterns within the text. Concepts such

as keyword counts, collocations of words and verb-form morphology inform detailed explanations of the patterns of language in use and the differences between texts and authors within a corpus (Kennedy, G., 1998). Recent advances in machine learning also allow computer-generated analyses of sentiment and other more sophisticated forms of linguistic analysis, enabling the easy study of large corpora.

One of the questions for consideration in the study is the effectiveness of Government policy discourse in producing behaviours and responses from other policy actors: whether it produces 'hegemonic discourse' that dominates the discourse of others and is reflected in what other non-Governmental policy actors say and write. Whilst the formal and public policy dialectic takes place within the Consultation issued together with the Green Paper, there exists a great deal of policy discourse and dialectic that takes place in other fora. On-line, policy actors generate discourse through frequent communication through both social media channels such as Twitter, LinkedIn and Facebook, as well as through public policy networks (such as WonkHE) and private email discussion groups or correspondence between actors. Discourse in speech is also found at policy conferences and Government consultation events, where the discussions are frequently recorded and so, with speech-to-text transcription, could be machine-readable. National-level policy submissions to consultations are often informed by private papers and discussions within institutions and within collectives of institutions, such as Mission Groups. Taking even a subset of some of this text, it would be possible to run quantitative computer-based analyses of the language in use, to address questions of inter-discursive and inter-textual similarity as well as to gain a very granular understanding of the language of policy debate.

There are drawbacks in the use of Corpus Linguistics for this study, however. The first is that the detailed linguistic analysis of a corpus does little to connect the discourse to actors and to the questions of influence of agency and structure. The objectivist-orientation may be valuable in identifying and describing linguistic differences but may fail to explain these, in a similar way to the shortcomings of policy sciences analysis discussed in the previous chapter. Who or what is exerting power over whom, how and why, are not questions well suited to the close analysis of text within a corpus. Secondly, corpus linguistics' focus is principally on the language itself. It does not help explain the social context for the production of that language. In the course of a study such as this one, the depth of attention to linguistic form would provide little scope for the wider questions about policymaking, power and social structuring that are the focus of this work. Thirdly, quantitative corpus linguistics works effectively on a large corpus, identifying words in use in policy dialogue at a given point in time for instance, but becomes less insightful when the corpus becomes smaller and where the discourse of individual actors and its effectiveness is the focus of discovery. For understanding the consciousness of the actor and their intentions, values and the conditions shaping their discourse, other methods are required, such as interviews with the producers of discourse. In large corpora, there become too many actors to make this practical. Similarly, as both Weisser and Kennedy acknowledge (Kennedy, G. (1998); Weisser (2016)) the opportunity from the use of computers to conduct quantitative

analyses of texts does not negate the need for interpretation and analysis by the researcher in exploring the outputs from the quantitative analyses – for the purposes of this study, the time involved with this process would not have been practical.

Corpus linguistics provides some potential for further research to complement this study, experimenting with an augmentation of it by the newly available opportunities presented by machine learning and corpus-linguistic software, such as 'R', to explore through quantitative analysis the discourse in use in other social and private locations by a much wider range of policy actors. This interesting approach might be seen to be compatible with the more participatory orientation of argumentative critical policy studies (Durnov et al., 2015) as long as it were used in the context of other critical theoretical frameworks. For this study however, a simpler form of linguistic analysis, a closer appreciation of the social forces shaping discourse production, and a triangulation with the views of particular actors is more appropriate to addressing the research questions under consideration.

Whilst none of the methodologies considered as alternatives to CDA have in themselves proved suitable, it is not to say that other combinations of these methodologies could not provide interesting tangential insights into the research questions, particularly when combined with CDA as well. Network ethnography, for instance, which uses social network theory to identify salient and influential network actors and then uses extensive observation and in depth interviewing of those actors to understand how policy networks function (see for example Ball (2016)), might assist in the tracking of the effectiveness of discourse with influential (nodal) networked policy actors, particularly given the prevalence of policy network analysis in policy studies (Ball, 2023). Yet, whilst a number of approaches have some merit, none adequately addresses the research questions set for this study.

To satisfactorily address the research questions requires, as argued above, a critical ontology, as is taken by most current policy analysts. It also requires, as seen in the last chapter, a trans-theoretical approach, drawing on the concepts and theories of Bourdieu, Gramsci, Foucault, Lukes, Laclau and Mouffe, and even Marx and Socrates in accounting for the complexities of power in modern policymaking. It requires too a trans-disciplinary approach: one that draws on different disciplines to unite text and context, agency and structure. An approach that can both explain, as with critical linguistics, what is 'going on' in a text, with its syntax, grammatical form and modalities, but also investigate and account for its impact in the social world, revealing, through sociology, the intent and effect, the exercise of power through institutions, processes, bureaucracies, the actions of elites and the interplay between politicians, civil servants and other policy actors.

In considering the appropriate methodology for this study this led to the selection of Critical Discourse Analysis. The next section explores the methodology in more depth to demonstrate its suitability for the study.

Rationale for selection of CDA as methodology

The term 'critical discourse analysis' describes not a single methodology but a closely related range of methodological frameworks within the tradition of critical realism. These approaches provide tools to understand the relationship between

forms of discourse and the social realities they exist within, and a set of principles to guide the conduct of qualitative social science research. The approach is often used in critiques of the current social order, revealing change and stasis and the reasons for those states, be they the result of agentive action by those with economic, cultural or social capital, or arising from the field logics of the habitus. Eschewing the notion of objectivist ontologies, critical discourse practitioners recognise the political nature of academic writing and research and the fact that the authors of texts are themselves influenced by and products of their own habituses. In recognising it they explicitly acknowledge their own political stances, enabling readers to be suitably critically aware of biases of the author as opposed to seeking to conceal it under a false objectivity. As van Dijk notes 'Unlike much other scholarship, CDA does not deny but explicitly defines and defends its own socio-political position. That is, CDA is biased, and proud of it.' And because it seeks to challenge narratives of domination, it must work particularly hard to demonstrate its scholarly rigour (Van Dijk, 2001, p.96).

Leading practitioners Ruth Wodak and Norman Fairclough (1997) describe an eight-point programme for all critical discourse analysis that illustrates its suitability for this particular study:

'1. CDA addresses social problems; 2. Power relations are discursive; 3. Discourse constitutes society and culture; 4. Discourse does ideological work; 5. Discourse is historical; 6. The link between text and society is mediated; 7. Discourse analysis is interpretative and explanatory; 8. Discourse is a form of social action'

Variants of Critical Discourse Analysis

From within this broad set of principles, different CDA practitioners have adopted slightly different foci leading to a number of variants within the CDA movement and are really best portrayed as different emphases and balance between the multiple disciplines that it is necessary to apply in using CDA.

Scollon (in Wodak, Ruth and Meyer, Michael, 2001) for instance describes Mediated Discourse Analysis, which emphasises the conditions of the formations of social actors that are creating discourse, and so leans towards the Foucauldian traditions of CDA. Wodak (in Wodak, Ruth and Meyer, Michael, 2001) sets out the Discourse-Historical approach, which stresses the historical origins of discourse, and calls for supplementing the in depth textual analysis with more significant ethnographic study to understand the question of agency and intent in relation to the creators and users of discourse. Van Dijk gives greater emphasis to the text linguistics and specialises in the theory and practice of CDA in relation to media discourse and the ways in which discourses embed and sustain prejudice (Van Dijk (1991),(1987)). With those approaches to CDA that emphasise the linguistic end, there are significant continuities with Critical Linguistics and the work of Halliday (1978) and (1994) and Kress (1989) and (1990) which found common cause in setting discourse in the context of the social conditions in which it was created. Another scholar, van Leeuwen, has concentrated in the particular domain of film and television production and the connections between non-verbal as well as verbal semiotic devices. Through this he has broadened his approach to focus less on the discourse but more on 'actors' as the creator and user of discourse in a variety of genres, including news media, radio and music, as well as augmenting theories of

argumentation and rhetoric with the application of Hallidayan functional systematic linguistics ((van Leeuwen in Davies, Caldas-Coulthard and Coulthard, 1999), van Leeuwen (1999)).

Despite the different emphases of these different approaches to CDA, Fairclough cautions against regarding these as separate and distinct schools or identities, and emphasises the need for flexibility between the different variants, with different scholars adopting different approaches depending on their research objects and the discursal and social conditions in a particular case (Fairclough, N., 2010). Van Dijk concurs, stating that in his view ‘Without being eclectic, good scholarship, and especially good CDA, should integrate the best work of many people, famous or not, from different disciplines, countries, cultures and directions of research. In other words, CDA should be essentially diverse and multidisciplinary.’ (Van Dijk, 2001, p96).

The selection of Fairclough’s ‘Three-Dimensional Model of Critical Discourse Analysis’

From this wider set of forms of critical discourse analysis, Fairclough’s three dimensional form of Critical Discourse Analysis (Fairclough, N., 1992a) has been selected for the purposes of this study. First set out in 1992, and developed through a variety of iterations over the following twenty years (Fairclough, N., 1992a; Fairclough, N., 1995; Chouliaraki, Lillie, 1999; Fairclough, N., 2010) this model provides a usable and insightful methodology for analysis. It works with the complexity of locating discourse within the context of social reality, it exposes insight within discursal forms that reveal the exercise of power, and it recognizes and exposes political perspective and values rather than seeks to conceal them. It aligns well with the use of Bourdieu’s conceptual framework for understanding power in society, that this study seeks to apply – an approach taken by Fairclough himself. CDA is a transdisciplinary methodology that seeks to explain not just to describe. It is a reflexive methodology that is critical, alert, overtly political and, it is argued, necessary for fully understanding how power is exercised through discourse in the policymaking process. It is also an honest methodology, transparent about the influence of the values of the researcher and how they might impact the research.

Fairclough formulates his methodology as four stages, ((Chouliaraki, L. and Fairclough, 1999) and Fairclough, N. (2010, p235)):

Stage 1: Focus upon a social wrong, in its semiotic aspect.

Stage 2: Identify obstacles to addressing the social wrong.

Stage 3: Consider whether the social order ‘needs’ the social wrong.

Stage 4: Identify possible ways past the obstacles.

At Stage One, he argues, the critical nature of CDA necessitates that an element of the current social order that the researcher regards as problematic be identified. He proposes this be pursued in two steps: the first the selection of a topic that can productively be investigated through transdisciplinary methods, and the second, the transdisciplinary theorisation of those topics into objects of research.

Stage Two involves asking why the organisation of the social order is as it is, and why specifically the 'social wrong' exists. Here Fairclough defines three steps: the analysis of orders of discourse and other social practice, the selection and categorisation of texts in line with the objects of the research and finally the analyses of texts, including both of their inter-discursive elements and the intra-text linguistic and semiotic dimensions.

The third stage is to consider whether the social order 'needs' the social wrong: is it inherent to the social order and required to sustain it, with change requiring an overturning of the social order, or whether it is not a requirement of the social order and so would be more likely to be able to be changed from within the current social order.

The fourth and final stage proposed by Fairclough is to seek ways past the obstacles. Again, with a focus on semiotics, he proposes that the insights drawn from critical analysis may be put to a positive critique and an identification of the ways that dominant discourse can be contested, criticised and resisted.

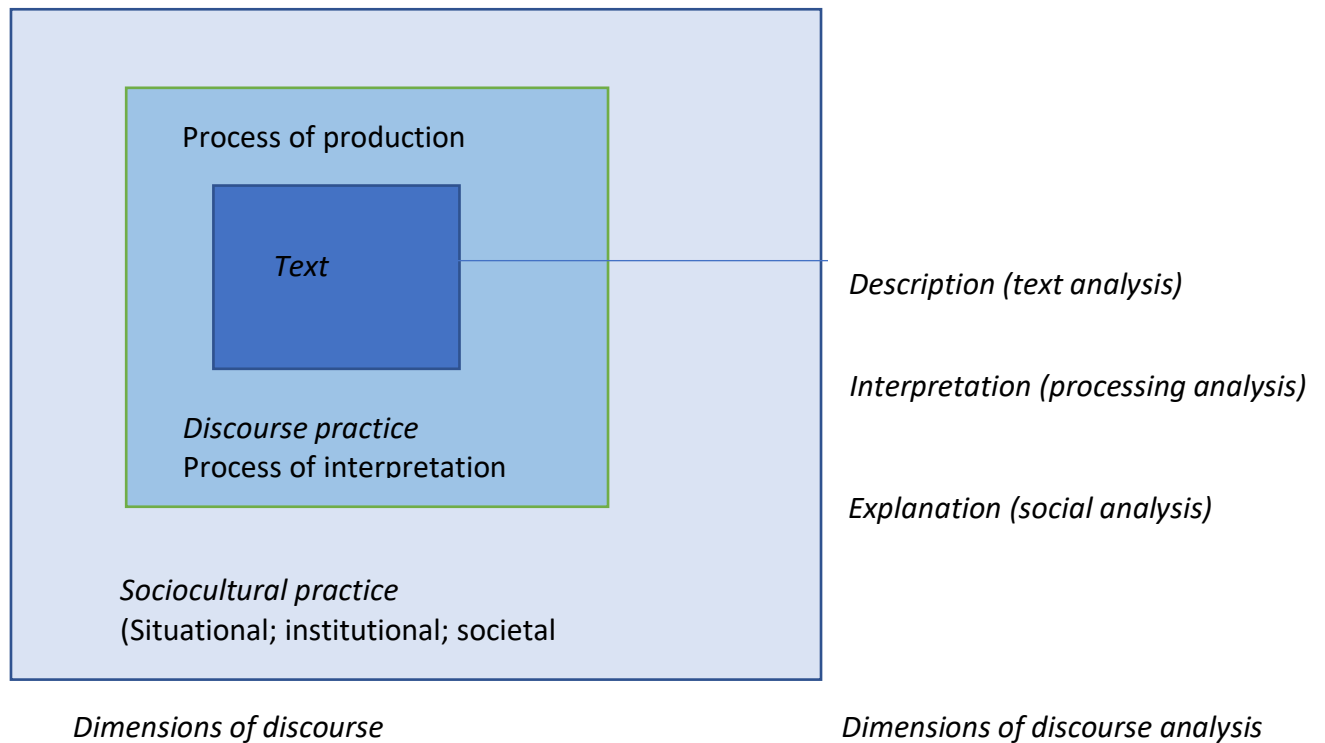
The notion of addressing a 'social wrong' inherent in this approach is problematic and perhaps unnecessary. An evolution of his earlier conception of 'problems' rather than 'wrongs' it serves to attract criticism of the methodology as being ideologically pre-determined and potentially narrows its application to use only by those who feel an interest in agendas of the Left. Whilst (in an era where globalised neo-liberalism is the dominant order) the identification of 'social wrongs' frequently involves the identification of an emancipatory or anti-capitalist agenda, as indeed is the case with examples Fairclough provides, it is argued here that this need not necessarily be the case. As set out below (see section on Critiques of CDA) the critical stance of CDA can be applied to any challenge of the status quo, of the forms, customs and discourse of any field. In a world of layered fields, it is theoretically possible for CDA to be used to reveal power in the discourse within one field dominated by a social-democratic paradigm, when the meta-field is one of a neo-liberal hegemony.

Fairclough himself also recognises the application beyond that of grand emancipatory projects in a discussion of the practicalities of 'doing discourse analysis': 'I have occasionally acted upon the assumption that the reader is about to embark upon a major research project investigating social and discursive change, but as many readers are likely to be using discourse analysis for more modest purposes, they should not be put off by these grandiose assumptions.' (Fairclough, N., 1992a, p225). The author of this study may be using it to uncover the way discourse is used to make a major shift of market economics into higher education but others will still benefit from the insights of CDA in demonstrating how such shifts are made and put the resulting knowledge to work for their own purposes. As Fairclough puts it: 'discourse analysts will be hard-pressed to prevent their well-intentioned interventions being appropriated by those with the power, resources, and the money.' (p240)

Through these stages the Fairclough methodology is pursued through three dimensions; dimensions which connect the macro of societal forces with the micro-level of linguistic textual analysis. For Fairclough, discourse analysis involves

'linguistic description of the language text, interpretation of the relationship between the...discursive processes and the text, and explanation of the relationship between the discursive processes and the social processes.' (Fairclough, N., 2010, p132) These are illustrated by Fairclough's own diagram at figure 1 below. The dimensions should not be taken as linear stages, but require reflexivity in the approach, adjusting provisional perspectives and notions as each dimension is informed by the other two.

Figure 1: Fairclough's Three dimensional model of critical discourse analysis (p133)



Fairclough sets out a clear set of tools that can be applied by researchers following the model:

Analysis of Texts

The first dimension of Fairclough's model is the analysis of the text itself, adopting linguistic analytical techniques and looking critically at where and how power might be being exercised. Texts are, for example, often written so that they cue the reader to use it in particular ways, what Fairclough calls 'interactional control' (Fairclough, N., 1992a). Control in discourse is asserted in other ways: for instance, the style of writing may be argumentative or explanatory, different forms of grammar may be used, and used selectively for different objects of writing.

Key concepts in the close reading of pieces of discourse are the ways in which different subjects are treated differently in the text, subtly influencing the reader in what they take from the text. What 'politeness strategies' are used, to whom and why? Do these differ between discussions of different groups or subjects? (p235) Where is agency located? Who, if anyone, is responsible for producing effects? Are active verbs used to describe the activities of some social actors, or, critically for

Fairclough, are nominalisations used – which he identifies as a particular signal that attempts are being made to manipulate the reader (p236). Similarly, he argues that where there is use of objective modality, this often implies some form of power and shows the commitment of the writer, and so is particularly useful to look for (Chouliaraki, Lilie, 1999, p159).

The meanings ascribed to words in the text are important to a critical reading. Fairclough cautions the researcher to be alert where there are unconventional word meanings used, or changed between pieces of discourse, or alternatively, where certain word meanings are used and reinforced: asserting control over the reader by creating associations and drawing on the connotations associated with particular word meanings.

Analysis of Discourse Practices

The next dimension in the model examines the forms of discourse in a text or speech. Key concepts in this regard for the methodology are ‘inter-discursivity’ and ‘inter-textuality’. The former concept encourages the researcher to identify the similarities in discursive form (such as genre or style) or in the use of particular text content and syntax, between different pieces of discourse and then investigate the chains of inter-connections and their conditions of production. Thus, a piece of discourse may share characteristics in its structural form, its ideation, or its key terminology, with other pieces of discourse that have gone before. Fairclough argues that policy documents are often written to speak to particular audiences that they seek to influence (e.g., specialist policy analysts). As such they will often follow forms, use terms, and structure their interactions with the reader, in ways that are familiar to the target audience (the specialist), facilitating their participation, yet are unfamiliar to the non-specialist (and thus serve to exclude them from the terms of a particular policy debate). Such connections are not bipolar, Fairclough argues, but often form part of inter-textual chains that sustain and extend their discursive forms from text to text (Fairclough, N., 1992a) - a useful concept for this study in the mapping of chronologies of policy actor-argumentation.

Some inter-textuality is ‘manifest’ in making explicit its connections to other texts, authors, or concepts, yet it is important too to look at the way that these are referenced – are they manipulated or presented polemically? Equally, certain discourse genres are expected to follow particular forms, or to follow certain norms of inter-textuality. Analysis should look not just at inter-textual links but the absence of them, when the genre or form may have meant a connection was anticipated. The social conditions of the discourse production should also be considered, providing the critical understanding of the reasons for difference or similarity between pieces of discourse.

Analysis of Social Practices

Finally, Fairclough describes the relationship with ‘social practice’ as his third dimension. Two aspects are identified: the social matrix of discourse; and the orders of discourse and its ideological and political effects. Here is where the impacts of the discourse on non-discursive behaviours – material effects - are revealed through the use of Fairclough’s analytical tools. Does a text seek to

challenge or reinforce social norms? Does it challenge, is it experimental, does it promote new forms of being, set itself in opposition to established distributions of power, or does it strengthen and justify them?

With *orders of discourse* Fairclough identifies three particular discursive forms to look for that indicate particular attempts to influence social action. These attempts are increasingly conscious, (rather than sub-conscious), acts. Discourse production is increasingly professionalised, with specialist authors, in this case policy analysts, using forms of discourse in ways that are known to influence the behaviours of the readers. Fairclough calls these 'discourse technologies' and argues that they are deployed in order to produce particular effects (Fairclough, N., 1992a, p236). It is a critical concept for this study, with its investigation of the effective agentic practices of professional policy actors.

Fairclough expands in 'Critical Discourse Analysis' (2010) on the theme of the increasingly 'technological' use of discourse, first introduced in his 1992 work 'Discourse and Social Change'. He provides two examples in 1992: *democratisation* in discourse, whereby 'conversational discourse [is]...projected into the public sphere.' (1992a, p236), informal or personalised tones are adopted and ideas presented as being the product of open discussion that all have the opportunity to access; and *commodification* in discourse, whereby social relations are presented in forms of market transactions and language, reinforcing and 'sedimenting' a neo-liberal, capitalistic lens through which to view the world. In his later work, the concept is expanded such that it is possible to see, in the hands of agents of the State, such as civil servants and related Government policy actors, how discourse technologies form part of what Rose and Miller (2008) describe as 'assemblages of diverse forces' that contribute to the achievement of government objectives. The critical insight offered by the Fairclough model in this regard is particularly pertinent to this study and an approach that Fairclough himself adopts in analysis of the discourse of the Labour Government in the UK in the 1990s (Fairclough, N., 2000) and of government policy agenda of welfare reform (Fairclough, N., 2010, p186).

Despite the semiology of the diagram of the model shown above, suggesting either starting with Text (at the centre of the diagram) or with Social Practice (working from the outside in), Fairclough actually proposes beginning with consideration of Discourse Practices first, then analysing texts before then considering the social conditions of which the discourse is a part. He is however not particularly concerned over where the researcher starts: the dimensions will often overlap, but he says there is value in his proposed ordering in that it involves movement from interpretation, to description and back to interpretation, and is of particular use when considering process and change, (Fairclough, N., 1992a, p231) as this study aims to do.

The application of Fairclough's Three-Dimensional Model of CDA in Practice

These three dimensions of the Fairclough model: analysis of the social conditions of production, of the text and of the impacts and interactions with social practice will

be applied to the discourses in the thesis as the methodology for investigation. The application of the model in practice: ontological considerations for the researcher and the research methods of CDA in analysis of written discourse is described below.

Transparency in values and ontology

Consistent with Fairclough's advice on the application of CDA, the author is open here about his own values so that the reader can use this in their own critical reading of the thesis. The approach taken is alert to the range of capitals that will be applied in effecting societal change yet looks critically at the way other capitals function as misrepresentations of economic capital which serve to sustain the economic (and social) dominance of an economic elite. This is not regarded as a crude division between the base and superstructure, however. Rather, following Gramsci (Buttigieg, 2006), it takes a position that elites use a variety of techniques to sustain their hegemonic position, which in contemporary times represents the advancing of neo-liberalism. As Bourdieu notes, this may be consciously enacted or sub-consciously sustained by actors with a variety of forms of capital acting within the habitus of a range of overlapping fields.

The epistemological approach adopted for this study also recognizes the potential for political agency, for actors to be conscious players to assert their own power over others. This view is also somewhat derived from the author's personal professional experience, having been engaged as a policy actor in both governmental organisations and bodies representing higher education institutions and having both observed and experienced the potential of conscious use of techniques to exercise power in policymaking.

This personal experience has also functioned as a source of insight in the construction of research questions, as well as a pragmatic means for gaining access to the subjects of the research. Rather than seeing this as being superfluous to the role of researcher, it will be used to support the research process, providing an 'insider view' to inform the questions to ask and methodological approaches to adopt. This perspective on society is one recognised in the literature: It 'assists the qualitative research to gain in-depth contextual information about a case study along with the symbolic practices, meaningful beliefs, and ordinary emotions that inscribe themselves in everyday interactions.' (Roberts, 2014: 4, quoting Geertz 1993 and Guba and Lincoln 1994).

It is recognised that the combination of an appreciation of hegemony and agency has also contributed to the author's selection of CDA to guide the epistemological methodology and to Bourdieu to understand how hegemonic domination is sustained; both consciously and sub-consciously, in addition to the extensive other reasons discussed above and in the previous chapter. The potential of CDA to produce insights into the workings of power and discourse in policymaking for other ideological projects than the overthrow of capitalism, means however that this study does not, as Fairclough prescribes, identify the 'social wrong', but instead aims to use the three-dimensional methodology for purposes where the potential outcomes are more differentiated.

Research methods applied in the study

This study gathers data from two sources: (a) Government policy texts in the form of the HE Green Paper, 2015, and the HE White Paper, 2016; (b) texts from other policy actors produced in response to the Green Paper. The details of all sources are shown in the table below.

This section outlines the methods applied in analysing the written texts, provides the rationale for the choice of sources, and identifies the limitations associated with these methods and the mitigations applied.

Table 1: Policy Texts

Responsible policy organization or actor	Discourse artefact to be analysed
1. UK Government	Green Paper
2. Universities UK	Published response to the Green Paper consultation from Universities UK
3. GuildHE	Published response to the Green Paper consultation from Guild HE
4. The Russell Group	Published response to the Green Paper consultation from The Russell Group
5. University Alliance	Published response to the Green Paper consultation from University Alliance
6. Million Plus	Published response to the Green Paper consultation from Million Plus
7. UK Government	White Paper

Methods for analysis of discourse in texts

Applying the CDA methodology, the method for discourse analysis has involved subjecting ten key texts to a close reading. Elements of discourse have been identified, recorded, and thematically coded, following coding categories derived from the three-dimensions of the CDA method (Fairclough, N., 1992a). An alternative approach would have been to generate coding categories from within the corpus in an open coding approach. As the study seeks to explore the usage of CDA as a methodology for understanding policy, this approach was not adopted.

Descriptions of Fairclough’s properties of text are set out below. The grouping of these into nine analytical properties has been presented below in a table and adapted from Locke’s organisation of Fairclough’s method (Locke, 2004). They form the frame for analysis of the policy texts described above.

Table 2 – Fairclough’s nine properties of text

Analytical property	Description
1. Interactional control	Stylistic and grammatical methods to cue the reader to use the text in particular ways

2. Modality	The strength of endorsement of a particular statement, emphasized (or de-emphasized through modal auxiliary verbs (such as 'could'), adverbs (such as 'possibly' 'certainly'), and tentative or assertive verbs (such as 'may' or 'are')
3. Politeness	The forcefulness of statements, whether assertions, accusations, or declarations. Looking particularly for evidence of where there is an absence of assertion or attack, a 'politeness' designed to avoid engendering a countering response in a written or verbal exchange, seek to signal a technique to sustain the existing social order.
4. Ethos	The way that people signal (or seek to conceal) their own social identity through verbal and non-verbal signifiers
<p>5. Connectives and Argumentation</p> <p>a. Reference</p> <p>b. Substitution and ellipsis</p> <p>c. Conjunction</p> <p>d. Lexical cohesion</p>	<p>The 'cohesion' of a text in the sense of how clauses relate to one another and how arguments are built through elaboration, extension, or advancement. Four techniques are identified:</p> <p>Are personal pronouns and demonstratives used to refer to things earlier or later in a text, signaling acceptance through informality for example.</p> <p>Are words used to substitute for others after a first usage, or ellipses used to signal norms and acceptance</p> <p>Are conjunctions such as 'because', 'and' and 'therefore' used to create continuity in argument and apparent consistency at an ideational level?</p> <p>Are common collocations of words used signaling familiarity or popular synonyms adopted where the extent to which the terms are synonymous might be contested?</p>
<p>6. Transitivity, theme, and nominalization</p> <p>a. Relational</p> <p>b. Action</p>	<p>Features of grammar whereby ideational aspects are coded, implicit or even hidden. Four types of transitivity process are defined:</p> <p>Relational: the way a verb may connect two actors</p>

<p>c. Event</p> <p>d. Mental</p> <p>e. Theme</p> <p>f. Nominalization</p>	<p>Action: close attention to the causality, responsibility, and agency in clauses – are they specific or vague? Is the passive voice used to take actors from the action?</p> <p>Event: In a subject-verb clause, has the intransitive form (e.g., All institutions agreed) been used, suppressing the direct object?</p> <p>Mental: Are cognitive verbs (such as ‘exemplify’, ‘think’, ‘feel’) used? How are they used? Are they used in transitive clauses (such as ‘Challenger institutions feel excluded) giving emphasis and force to rhetorical argument?</p> <p>In addition, Fairclough identifies two other grammatical aspects:</p> <p>Theme: Are some elements of a clause given prominence such that they are presented almost as ‘common-sense’, dulling the critique that they might be otherwise be subject to.</p> <p>Nominalization: Are processes adapted to become nouns or noun phrases facilitating the elision of either the agent or the goal or both? (e.g., ‘Low participation neighbourhoods produced few applications’, rather than ‘Learners from working class wards did not apply to university’)</p>
<p>7. Word meaning</p>	<p>Has the potential of some words to have several different meanings been exploited to stretch and distort its semiotic significance? Have meanings of words been used or manipulated (for example by seeking to describe certain unpopular propositions in the language of terms readily accepted by the discourse receivers), to subtly shift the meaning and produce a reinforcement of acceptance.</p>
<p>8. Wording</p>	<p>Have words been used to describe nouns or objects to provide or suppress emotive charge (such as ‘alternative providers’ rather than ‘private for-profit companies’) to influence the reader’s perceptions? What is the word count of particular words? Are certain words or phrases used extensively, suggesting a desire to normalize them? Are particular words used to reinforce inter-discursive chains between texts?</p>

<p>9. Metaphor</p> <ul style="list-style-type: none"> a. Simile b. Personification c. Metonymy 	<p>The choice of metaphor (simile, metonym, and personification) can be used to influence the way the reader thinks about and acts in relation to a text (e.g., ‘collateral damage’ as opposed to ‘soldiers shot dead by their own side’). They are influential in the persuasiveness of a text and their usage prompts questions of why they have been used, what is the discourse intent?</p>
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When this categorisation is applied to the documents analysed, some pieces of text are illustrative of more than one discursal element and the categories used are not mutually exclusive. For example, a section of text may contain an example of nominalisation in the use of a particular definition, be an example of inter-textuality, having re-used a longer phrase from a previous document, and also contain propositions that form part of an explicit argument.

Once the texts were coded, the discourse revealed in them was analysed using the qualitative research software NVivo (QSRInternational, 2019) to facilitate easy storage, recall and manipulation. A sample of coding applied to the texts is attached at appendix III.

Selection of texts

As it is not possible to analyse the full corpus of policy discourse produced by all policy actors in this particular moment of policy development, it has been necessary to select the texts that were to be analysed. The criteria for selection was drawn from the research questions and the limitation described earlier in this chapter:

The ‘policy moment’, the ideational stage of policy development between Green Paper and White paper, is punctuated by two texts: The Green Paper setting out initial ideas, and the White Paper solidifying these in readiness for the drafting of legislation.

The study focuses on the discourse of selected professional policy actors: those from HE Mission Groups and Representative Bodies and the extent to which they were influenced by the discourse of the Green Paper and the extent to which they exert influence over the discourse of the resulting White Paper. Thus, the remaining texts for analysis are the formal written responses to the Green Paper consultation published by all Mission Groups and Representative Bodies at the time: ‘Representative bodies’ Universities UK and GuildHE and the ‘Mission Groups’ – The Russell Group, University Alliance, and Million Plus.

Access to all seven texts was unproblematic as all are extant, published, texts that are readily available on the internet sites of the various organisations and Government departments.

Other texts were available for analysis that could have been selected. Whilst the Green and White papers represent the obvious, published, phases of the development of the Government position, it may have been possible to seek to access earlier drafts of policy in development both pre-Green paper and pre-White

Paper, through discussion with the civil servants involved (although there is no obligation in the UK under Freedom of Information legislation to release papers relating to 'policy in development'). This would not however have revealed the impacts of policy discourse on other policy actors that is the focus of this study.

From the non-Governmental policy actors there were many other submissions made to Government as part of the consultation on the Green Paper. Perspectives from non-HE institutional stakeholders, (such as students, staff, trade unionists, FE colleges, or awarding bodies) could have been studied and their relative levels of influence on the White Paper considered. Similarly, there were many responses from individual universities and HEIs in addition to those from their Mission Groups and Representative Bodies. These could have been analysed and, as a different study, differences in substance and discourse between university responses and those of their Mission Groups explored. As this study seeks to explore the expert use of discourse by professional policy actors, however, it is argued that a focus on Mission Groups and Representative Bodies is more appropriate, given that in each of the other stakeholder groups, the extent to which responses are written by policy professionals is variable.

Plotting the temporal in argumentative policy discourse

As noted in chapter one, argumentative policy analysis rarely considers the practice of argument between 'arguers' in the process of policy development. The policy moment being studied; following a formal staged approach and being split between the launch of the Green Paper and publication of White Paper, makes this more straightforward for this study than might be the case for less staged engagements or over a longer period of policy development. However, the timing of the different discursual utterances have been identified, so that an assessment can be made as to the extent of discursual connection between texts and the play of the 'argument'. At a high level this follows the structure: Government issues policy proposals; stakeholders publish responses (largely simultaneously); Government considers them then publishes synthesis and White Paper.

Critiques of CDA as methodology

Despite the prevalence and growth of CDA as a methodology in the study of power in a variety of contexts (see for example the literature reviews of its use in education in (Rogers et al. (2005) and (Rogers et al., 2016) it has also had its critics (Widdowson, H.G. (1996); Stubbs (1997); Widdowson, H. (1998); Flowerdew (1999); Price (1999); Tyrwhitt-Drake (1999); Machin (2012). These critiques focus on three principal areas: the failure to maintain sufficient distance from the subject of study; the failure to adopt sufficiently rigorous methodology to justify the certainty of its conclusions; and the failure to fully acknowledge or explain the capacity for agency.

i. Insufficient distance from the subject of study:

The first collection of critiques relate to the argument that CDA practitioners take insufficient distance from the subject of study: creating their own form of hegemonic discourse of academic analysis; and taking from ideology, as opposed to empirical classifications, the definitions of which groups or individuals in society are 'oppressed' and which are the 'oppressors'.

In the first of these, CDA is charged as failing to recognise that CDA academics are themselves shaped by the habitus that they work within. This study attempts to counter this criticism through considerable exploration of the habitus of the field of liberal academic universities to raise the awareness of the author of the conditions that might shape his perspectives. It also attempts to be alert to the possibilities of the way that his own discourse acquisition is shaped by the habitus and that, as Price states, 'Individuals will be bound always to assimilate texts to discursive positions or realities they already occupy.' (Price, 1999, p588).

The second criticism is that CDA analysts create their own hegemonic discourse of academic analysis, which far from lifting the veil for researchers enabling them to see a wider plain of possibilities, creates its own myopia in which every utterance and relationship is seen only as an example of oppression and domination. It argues that such is the rise and dominance of CDA as a methodology, no other approach is seen by CDA practitioners as being sufficiently critical and insightful to reveal the 'reality' of power in society, and so insights are lost. Furthermore, Widdowson claims that the assertion of a moral superiority on the part of CDA practitioners masks what he argues is often a weakness of argument. A closely related argument comes from Price (1999) who proposes that far from demystification of an original piece of discourse, CDA analysis actually serves to constitute new discourse, sustaining CDA's hegemonic discourse of academic analysis, through a redefinition of texts through the lens of CDA.

It can be argued however that CDA, as a transdisciplinary approach, is more alert to the possibilities of insights from other methodologies than many other approaches. Chouliaraki and Fairclough (1999) point to the importance of reflexivity on the part of the researcher and Bucholtz (Bucholtz, 2001) similarly advocates a highly reflexive approach, being prepared 'to look squarely at our own relationship to our research' (2001, p181) considering both the findings but how the researcher feels emotionally about those findings, and exploring the consequences of those feelings. In relation to this study, it can be seen from this chapter that following a CDA approach has not closed off the possibilities presented by other methodologies: indeed, such connections have been actively sought out, as is common in CDA practice. Furthermore, significant efforts have been made to ensure that reflexivity and self-criticism has been adopted.

A third related critique is that CDA makes assumptions as to those who are the oppressors and those who are the oppressed, the hegemon and the dominated, without empirically evidencing that those are the salient dialectics shaping social relations or indeed discourse. It is argued that such characterisations frequently assume that certain groups (e.g., the working class, women, minority groups, left-wing activists) are, in every instance, the oppressed, without exploring and establishing either the material conditions of domination or the complexities of intersections of oppression (such as capitalists who are black or women who are members of political elites). If such relations are assumed, not evidenced, then it is argued that the discourse cannot be said to be reinforcing of a hegemonic structuring of society. This argument has a weakness in that it can be established empirically which groups are materially disadvantaged, or, in discourse analysis, which voices have greatest share of the volume of discourse, which are most cited

in inter-discursive chains etc. Whilst it is true that no one study will explore all possible inter-sections of dominance and oppression, it is possible to demonstrate that the arguments put forward by an argument developed using CDA methodology are rooted in evidence. CDA develops analytical explanations of the power hidden and embedded in discourse. These are then assessed by the community of scholars and practitioners as to whether they resonate as explanations and whether they are replicated in other contexts. They may not be identical in each case, or explain all aspects in every instance, but the identification of salience in the particular moment can give them a strong explanatory power.

- ii. Adopts an insufficiently rigorous methodology to justify the certainty of its conclusions

There are three dimensions to this group of critiques: that the producers and consumers of texts are not consulted; that CDA is 'too selective, partial and qualitative' Machin (2012, p219) and insufficiently structured in its investigations; and that CDA has left-wing emancipatory conclusions built into its methodology.

Widdowson (1998, p142-143) argues that CDA 'never' attempts to consult the producers and consumers of texts, with the intentions of the producers 'vicariously inferred from the analysis itself, by reference to what the analyst assumes in advance to be the writer's ideological position.' and the understanding of the readers. One extension of this critique is actually effective at illustrating the strength of CDA methodology. McFarland (2006) sought to test the critique of the failure to consult the consumers of discourse, and repeated a Fairclough, N. (1992a, p169) study of 'The Baby Book' an advice text for pregnant women, criticised extensively by Widdowson at the time for its failure to speak with the producers or the intended recipients of the text. McFarland supplemented the original CDA approach with interviews with 24 pregnant women. and found that the views were different to those attributed to them by Fairclough. Although cited as evidence of weakness of CDA, I would argue this does not negate the value of Fairclough's approach. It is no surprise that participants, be they pregnant women or professional policy actors, do not adopt the reflexive processes of the analyst, and adopt values, views and behaviours consistent with the habitus in which they operate.

The second methodological critique is that CDA is too selective and partial in the discourse analysed and ascribed with meaning. This selectivity is criticised in relation to the balance of significance ascribed to the macro and the micro, to the social and the individual agent, and typically fall to social theorists arguing that wider social forces are under-represented, and linguists arguing that the complexities of language usage and intent are neglected in the broad-brush CDA methodology. There is debate however amongst the critics of CDA as to what might improve this situation. Some, such as Verschueren (2001), have called for a more systematic and consistent application of a more tightly defined CDA method, although others, such as Bucholtz (2001), have argued that such a project would make research unmanageable as each research project requires a different balance of close discursive analysis and engagement depending on its context, necessitating a diversity of approaches that actually strengthens the CDA framework. A universalist approach would involve collection of large quantities of superfluous

data and make it near impossible to connect language and discourse with the wider social forces, that gives CDA its explanatory power. Rogers et al.'s prescription (2016, p387) for CDA is for researchers to attend to: '(a) the links between the micro and the macro; (b) explaining why certain linguistic resources are analysed and not others, and (c) clear analytic procedures outlining the decision making of the researcher.' All three approaches have been attempted in this study.

Finally, and offered by many critics of CDA as the explanation for the lack of uniform structure and partial and selective approach, CDA is criticised as a methodology that begins with an ideological position that it seeks to support with evidence that is selectively sought out. Widdowson argues that CDA is not a form of analysis but of interpretation in which 'interpretation in support of belief takes precedence over analysis in support of theory' (Widdowson, H. G., 1995, p159). Whilst it is true that many CDA studies adopt an emancipatory agenda, seeking to reveal the way that powerful actors use discourse to secure the domination of those less powerful, this does not in itself undermine the methodological strength of CDA and may also not be regarded as a surprise. Just as it is said that history of war is written by the victors, it is those with greatest resources in society that establish dominance in discourse. Any methodology taking a critical orientation will seek to reveal alternative perspectives to those of the dominant order. The prevalence of studies exploring a working-class or gender perspective is arguably a function of the economic, social and cultural inequalities exhibited in a wide range of capitalist, patriarchal societies across the world (Wilkinson, 2010).

The methodology is equally effective in revealing the discursive dimensions of power associated with other interests. Indeed for this study, some, including probably the Minister for Higher Education, might argue that the dominance of New Public Management could be represented as a form of public policy that sustained social-democratic organisations of society, led to complacent, self-interested quasi-public 'incumbent providers' and suppressed the societal opportunities that might come from unleashing the potential of the forces of private free enterprise, competition, entrepreneurship, and innovation: an arrangement that sustained cultures of dependency in organisations and individuals that fed on the fat of the State's largesse.

In this social order, CDA might be used to reveal a hegemonic discourse of those interested in sustaining a social-democratic State-led order. The dominated interests and organisations in this arrangement could be regarded as private sector educational providers finding barriers to entry to the education sector at every turn, with legal apparatus, regulation, funding arrangements, social status, the civil service, and networks of political and educational policy influence, all contributing to the habitus of a field designed to exclude them. Whilst many might argue that this is right and proper, and that there are domains of social life, such as health and education, that should not be subject to private sector influence, such arguments are rarely made explicitly. They are seen only in the detailed workings of power in the HE system, and subtly sustained through the discourse of the established elites.

The purpose here is not to establish the strength of this argument or its weakness. This chapter is about methodology. The example demonstrates that CDA as methodology, far from having left-wing findings as a tautological conclusion, can be

applied to reveal the operation of power within discourse, whatever the groups or situations that are the objects of investigation. It does require an openness to different forms of domination, but this too, the need to demonstrate a self-critical dimension to research, is a feature of CDA. Combined with the notion of field hierarchies from Bourdieu, it actually provides a mechanism for analysing and assessing the nature of the complexities of intersecting power-relations. Thus, this section and the response to critiques of CDA demonstrate the way that such auto-criticality has been applied in this study and the appropriateness of CDA as a methodology for the effective analysis of discourse and power.

iii. Fails to fully acknowledge the capacity for agency

There are two dimensions to this critique of CDA. The first relates to the already referenced argument, usually made by scholars of linguistics, that CDA is ideological and thus, as ideology is about adherence to universal truths, the CDA methodology favours 'grand narratives' and attributes action to macro, rather than micro-level determinants. Macro-level concepts such as neo-liberalism, class struggle, and social forces are regarded as being the more important in shaping behaviour and discourse and thus the users of the discourse are passive, influenced by the habitus and the meta-level fields to use discourse in ways that are unthinking, automatic. The critique here is that the capacity to act with agency, to understand the potential impacts of particular discourse technologies and to use them deliberately, is not sufficiently acknowledged, and as a consequence, the extent to which such deliberate agentic discourse practices are deployed is not sufficiently rigorously investigated. In this study, this has not been an issue. The study sought to investigate whether policy professionals use of discourse is deliberate or shaped by the habitus, and thus close attention has been paid to the potential of this kind of agentic discourse usage, with the hope that it may be possible to identify which types of discourse were effective in which contexts and inform future policy practice as a result.

A second, more nuanced critique comes from Price (1999) who argues that there is too great attention paid to the study of discourse and not enough to the study of discourse in action. Discourse, she argues, is not a process of acquiring and reproducing stable language forms and practices. Actors produce discourse in the moment, inexplicable in terms of their individual intentions, but produced as a result of the interactions between actors who in the process of discursual exchange, shape a new discourse. Critiquing both Fairclough and Widdowson, Price argues that discourse acquisition, 'must therefore be linked to exploration of the instability disguised by the apparent stability of discourses, rather than to attempts to reproduce specific forms of stability or, in critical approaches, to replace one stable discourse with another, more equitable one.' (p582) As in this study, Price identifies the attribution of change in discourse as problematic, due to the interaction of the agentic actor and the habitus. 'If acquisition depends upon occupying a certain reality – a habitus, perhaps – then the issue of change and acquiring a new discourse remains a real problem. Individuals will be bound always to assimilate texts to discursive positions or realities they already occupy.' (p588).

Price highlights the tension between discourse in the Foucauldian sense of social forces shaping language (Foucault, 2002), and the pragmatism of Widdowson that

characterises discourse as shaped by individual actors who 'choose' a discourse. It is argued here that CDA actually attempts to resolve that tension by recognising that both are involved in the shaping of discourse and the shaping of its use, and that one must remain critical, aware of discourse, its power and its uses, in order to be critical about ones' own usage of it. Price recognises that there is a certain habitus of policy actors, shaping their discourse. But we should, following Fairclough, see that consciousness about discourse and the potential for it to be used ideologically, can be a valuable tool for policy actors. One of the aims of this study is to support policy actors in raising their consciousness in this way.

Mitigations applied in the study

In summary, it has been important to take seriously the critiques of CDA and where they appear to have some salience to mitigate the limitations of the methodology. These mitigations, discussed in the sections above, are summarised below.

1. The researcher has taken a reflexive approach to his own research practice and explored the impacts of conducting research from within particular fields of practice
2. The producers and consumers of discourse have been defined and the study has examined the chronological interplay of discursive attempts to exert power
3. The study is open to the potentials of the structuring of the habitus, the inter-discursive and inter-textual continuities that might sustain it, and to the potential for agency on the part of the professional policy actors that are the subject of the study
4. The methodology has been deployed recognising its potential for revealing how radical policy change of any particular political perspective can be brought about through discourse and not in pursuit of a pre-ordained outcome.
5. Limitations are recognised in relation to the ability to extrapolate from the case to the general levels. The conclusions that have been drawn later in the paper are prepared for the academic and practitioner community for critique and further exploration. As such, as with much inductive reasoning, they are provisional and will be tested as viable explanations through further interrogation by others.

Political Discourse Analysis

One final, significant critique of CDA comes from Norman Fairclough himself. Fairclough, I. and Fairclough (2015) respond to the criticisms of Fairclough's three-dimensional method of CDA (Fairclough, N., 1992a) and put forward a case for augmenting it with an understanding of the practice of argumentation in the attempt to develop a new methodology for the analysis of political discourse. They develop the new approach of 'Political Discourse Analysis' to deconstruct political discourse and its creation of practical argument. They advocate consideration of argument as a dialectical process and one where the inputs of multiple actors often contribute, and set out, as with this study, to provide analysis that will be valuable to political actors in the process of policy development (which is, as we have previously discussed, widely now recognised as an argumentative process). They re-

analyse a speech by Tony Blair as Prime Minister first analysed by Fairclough in 2000 (Fairclough, N., 2000), and identify what they might describe as an argumentative technique: the presentation, in monologue form, of an argument in the form of weighing three options, simulating a dialectical argument. Whilst their attempt to create a new typology and method of analysing political argument is interesting, arguably it blunts the explanatory insight of the original form of Critical Discourse Analysis that it is designed to augment. In the context of this study, this presentation by Blair could better be regarded as a discourse technology deployed to exert power over others. The new PDA takes as its unit the description of the elements of the argument. This provides second order explanatory insight into the power dynamics at play.

This is not to say that the goal is not a worthy one to pursue, but their analysis falls short, as others have also commented (Finlayson, 2013; Hay, 2013). What this study aims to do is to retain the explanatory power of CDA methodology and connect it to the analysis of practical argumentation between policy actors. Fairclough's prior analysis of forms of argumentation is similarly more powerful than the more recent work. Fairclough and Fairclough make some normative assumptions that an application of Bourdieu or indeed of Fairclough's initial CDA method would have avoided - assumptions about the purposes of political discourse in use and the agentive action of the actors. Whilst using similar terms they draw disappointingly mundane conclusions with limited explanatory power. The aspect of argumentation that they aim to connect with CDA is the 'Construction of argument', not the 'practice of argument' as a social process where the interchange and success or failures of attempts to exert power are realised. For these reasons PDA has not been used for this study, although as an example of an alternative approach to address the same problem, and in the provision of examples of types of discourse technologies (such as what they describe as 'persuasive (biased) definitions' it is useful as a comparator.

Methodological Conclusions

This chapter has examined the ways that the methodology and methods have been selected for this study and provided descriptions of their application, including the ways that methodological vulnerabilities have been assessed and partially overcome. In conclusion, this study, within a theoretical framework provided by critical policy theory and Bourdieu's thinking tools, adopts Fairclough's form of Critical Discourse Analysis. It studies discourse in text, enabling the detailed, empirical comparison between texts produced by different professional policy actors, and the opportunity for and evidence of agentive use of discourse. It combines analysis of the context and social structures, with close analysis of discourse in text,.

Important within this conceptual and methodological framework is the social, economic and historical context of the policy process being studied and the discourse being analysed. The next chapter, applying a Bourdieusian analysis, provides that context to the CDA study of text that follows in chapters VI and VII.

Chapter IV: Context

Introduction

This chapter aims to provide a context to locate the primary research of this thesis within. Context is particularly important for critical discourse analyses and of significance to studies that wish to explore the fields within which discourse practices take place and the relationship between fields, such as this one. The thesis gives close examination to the discourse and dialectic relationships of policy actors in a particular field (HE policymaking), in a particular place (England), and time period (between 2015 and 2017).

To aid the understanding of these practices, this chapter will explore the preceding period of politics and policymaking within England. This was a period that saw the steady adoption of what became known as New Public Management in the approach to conceptualising and implementing Government policy. This is explored in the wider field of English public policy as well as the specifics of the sub-field of HE policymaking. The chapter goes on to outline the contemporary practices, structures and relationships of HE policy actors in the period 2015-17, what Bourdieu might describe as the doxa and habitus of the field, as well as to summarise some of the developments immediately preceding the Green Paper of 2015. It concludes with considering what contexts were present that nurtured or gave rise to such a radical policy proposal as the 2015 HE Green Paper.

It is the intention that this critical understanding of context will facilitate later consideration of power dynamics and how conditions are created in which a number of policy actors support changes that might arguably be counter to their own interests, what Bourdieu might frame as the exercise of 'symbolic violence' (Bourdieu, 2013, p148). Similarly, it examines context in order to understand the way that radical policy change occurs. Policy theorists Rein and Schön (1993) have drawn parallels with Thomas Kuhn's work on the philosophy of science (Kuhn, 1962) to help understand how context is significant when policy is made. Far from progressing through incremental shift in the policy consensus, Rein and Schön argue that policy moved forward through a period where policy actors understand and operate by the 'rules of the game', but where there is an accumulating challenge to the precepts and norms (or doxa) of the preceding frame (or paradigm), followed by a period of revolution. Rein and Schön argue that when that consensus breaks down, there occurs a moment 'in which scientific disagreement cuts across paradigms and there is no agreed-upon framework for settling disputes' (Rein and Schön, 1993, p148) which is where radical change occurs. The context to the Green Paper will therefore also be investigated with a view to understanding how and why radical policy change occurs.

Why is context important – Fairclough, CDA and Bourdieu

As was explored in the preceding two chapters, 'context' is important in Fairclough's three-dimensional model of critical discourse analysis, both in conceptual and methodological terms. It is also an aspect of research that some have argued has often been approached with insufficient methodological rigour in

many empirical studies applying CDA (Leitch and Palmer, 2010) in contrast to greater definitional control in relation to 'texts' (Fairclough, N., 1995). The socio-economic conditions of the production of discourse, as well as the linguistic forms of policy discourse itself, are strongly inter-related. Examination of inter-textuality and inter-discursivity, where the precedents of specific language and wider discursive norms used in a policy text are traced, requires an historical perspective, at least in the preceding thirty or forty years, which will be the periods that will have directly shaped the outlook of contemporary political actors studied in this thesis.

This historical perspective is important from a Bourdieusian perspective also – to understand the creeping acculturation, or sedimentation, of the doxa forming the habitus of the elite within fields it is necessary to study the conditions in which that sedimentation took place. To trace the ways in which policy actors that are the subjects of study come to advocate for measures, actions, and in this case policies, that sustain their subjugation, and are counter to their interests, requires consideration of social, economic, political and cultural context. In an era in which actual violence and confrontation in pursuit of political goals is considered high risk and high cost, symbolic violence has become both normalised and better developed as a means for exercising power over others. Critical study of contexts in recent history may shed light on key moments of shift in perspective and illuminate topics for future research in policy and power.

Context must also be understood in terms of an analysis of a current state of power relations at a given point in time. This consideration of the context at a particular moment, such as the publication of the HE Green Paper, facilitates critical understanding of inter-textual and discursive influences beyond the immediate conditions of a text's production. For example, are discursive exchanges around a particular piece of HE policy also influenced by contemporary political agendas, social norms and economic conditions? From a Bourdieusian perspective, the immediate field of English HE policymaking is also influenced by power dynamics in other fields, and the inter-relationships between fields, the hierarchies of the fields, and the unequal distributions of economic, social and symbolic capital that see certain actors hold elite positions across fields and thereby exert power beyond their immediate field of practice (Bourdieu, 2010).

The historical context of public policymaking – the rise of New Public Management in public administration.

To understand the historical context for the HE Green Paper of 2016 it is necessary to trace the application and development of public policymaking and the growth of New Public Management (NPM). This section sets out the features of NPM and their emergence from the 1980s in public policy in the UK and goes on to examine the extent to which those features were present within English HE. It is followed by a more detailed exploration of NPM's development in the period immediately preceding the Green Paper – 2010 to 2015 and the emergence of the doctrine of 'private ownership' as the missing element of NPM in English HE.

New Public Management first came to prominence in the UK in the 1980s as part of 'New Right' thinking influencing the Conservative governments led by Margaret Thatcher. The UK's was seen by many as a 'vanguard state' in the extent and length of its NPM-style reforms (Hood, 2015, p265), an approach subsequently adopted across much of Western Europe. In the UK, NPM accompanied a widespread privatisation of what had previously been publicly owned industries and services. From energy, to dockyards, bus and rail transport to aerospace and telecoms, private for-profit operators were brought in to own and provide what had previously been part of the public sector (Parker (2009), Parker (2012)). Where industries or services had not been privatised, NPM sought to change the management of public sector services to be more like that of the private sector and to blur the distinctions between the public and the private realms that had been the feature of 'Progressive Public Administration' in the late nineteenth and early twentieth centuries (Hood, 1995).

Hood identifies seven 'doctrines' that are present to a greater or lesser degree in NPM systems of public administration: '1. The unbundling of the public services into corporatized units organised by product; 2. More contract-based competitive provision, with internal markets and term contracts; 3. Stress on private-sector styles of management practice; 4. More stress on discipline and frugality in resource use; 5. More emphasis on visible hands-on top management; 6. Explicit formal measurable standards and measures of performance and success; 7. Greater emphasis on output controls (Hood, 1995, p96).

This NPM approach was applied across Europe and across the public sector with many countries introducing it to the realm of higher education (Broucker and De Wit (2015); Bleiklie (2014); Ferlie, Musselin and Andresani (2008); Reed 2002; Enders, J and Westerheijden (2014)), a new paradigm, that broke down the old corporatist certainties of the post-war era. Within HE, it similarly involved a common set of reforms (cf. Hood and Peters (2004); Ferlie, Musselin and Andresani (2008)). Ferlie describes ten (Ferlie, Musselin and Andresani, 2008, p336) including 'market-based' reforms aimed, as Bleiklie et al note (2014), 'at increasing the level of competition among institutions, staff, students, and territories'; output and outcome-based funding and tighter budgetary controls; the adoption of explicit performance management techniques for academic endeavour; the creation of a 'quasi-market' with greater funding for the 'better performing' universities; and changes to the governance and leadership of universities.

Whilst reforms were significant, however, they were not always an entirely clear break from the past, nor did they applied within higher education the full range of characteristics identified in Hood's typology. The more recent literature points to the notion of a purist approach to NPM as being tempered by systems of 'network governance', where stakeholders identified as legitimate were given influence over decision making, adapting more consensual forms of governance and applying them at the micro-level of public sector organisations such as universities Enders, J and Westerheijden (2014), Bleiklie et al. (2011), Bleiklie (2014)).

New Public Management and English Higher Education

To examine the case of the English HE system against Hood's seven characteristics, it can be seen that many were present within English HE by 2015. A short description is provided below for each of the seven 'doctrines'.

1. The unbundling into corporatized units

Higher education was provided by a number of universities and colleges. From 2000 onwards, there were successive reforms, led by the HEFCE, to increase the accountability of institutions, strengthening and defining the responsibilities of their governing bodies, and holding them to account for delivery against identified measures of performance. Under-performing 'units' were supported through intervention by HEFCE with the support of specialist agencies, auditors and accountants, with those suffering financial difficulties encouraged to merge with other larger providers.

The administration of public-policy was similarly undertaken by independent bodies at arms-length from Government, so called Non-Departmental Public Bodies (or NDPBs), but guided by it through an annual 'grant letter' providing guidance to accompany the public money administered by the NDPB, in this case HEFCE. HEFCE itself created its own specialist organisations to support the system and policy goals, such as the Quality Assurance Agency, Higher Education Academy, Foundation Degree Forward, the Equality Challenge Unit, HE Statistics Agency, and Leadership Foundation for HE, sustaining them with public-funding and tasking them with specific objectives and deliverables.

2. More contract-based competitive provision, with internal markets and term contracts

Whilst core funding to universities was provided on the basis of a 'block grant' for teaching and aspects of research, significant discretionary funds for both research, education and organisational change were used by HEFCE to incentivise providers to pursue change initiatives consistent with Government policy and to reward them for the submission of quality proposals in pursuit of specific goals, be those research projects or expansion in education. Providers were forced to bid against each other in frequent competitions, though not against private sector operators. In this period different 'Mission Groups' emerged representing the interests of subscribing member institutions that sought to differentiate themselves from other groups of institutions.

3. Private sector styles of management

These measures were pursued by HEFCE through its agency the Leadership Foundation for HE that promoted and funded new developments in leadership and management as well as provided training directly in 'modern' management and leadership approaches. Universities were also invited to bid for grant funding for organisational change initiatives that experimented with performance-related pay within universities. Within universities the structures of power were reorganised around managerial lines and hierarchies, from the Vice Chancellor and CEO to second tier Deputy- and Pro-Vice Chancellors, and third 'tier' Deans expected to implement organisational strategy.

4. Frugality and discipline in resource use

This was applied both through the auditing of HEFCE and the funding it distributed by the National Audit Office, but also through the continual measurement and reform in the use of funding distributed to universities. The HEFCE commissioned reports on efficiency and financial sustainability within the sector, using it to both tweak the methods it used for the distribution of public funds but also to promote and mandate particular forms of accounting practices by universities in assessing the 'Full Economic Costs' of all aspects of a university's operations.

5. More emphasis on visible hands-on top management

By 2015 many university vice chancellors had added 'Chief Executive' to their job titles, reinforcing the message that they were responsible not just for the academic leadership of the organisation but for its business success. Relationships between Vice Chancellors were important in forming alliances, doing business deals, and in influencing Government. The Chief Executive of HEFCE, always a previous Vice Chancellor since its creation in 1992, held considerable personal power, was accountable to ministers and influential with the vice chancellors who led the different 'production units' of universities. Boards of non-executive directors on University 'Councils' held the CEO to account and were strengthened through formal recognition by HEFCE as part of the system of governance and accountability. Academic senates, formerly representing all members of the academy, were typically reformed to 'balance' those interests with University leadership and management as well as students, and their powers curtailed in favour of the CEO and Board.

6. Explicit formal measurable standards and measures of performance and success

The period from 2000 saw the extensive use of standardised reporting and measurement of success in English HE, driven by HEFCE. Standard Performance Indicators were defined and published for all providers, the National Student Survey showed student ratings of their experiences, and a sector body the HE Public Information Steering Group sought to steer a consensus around appropriate standardised measures of success, with a further agency, 'Unistats', creating and publishing for public consumption data, derived from and reported to the HE Statistics Agency. All university research output was measured, through five-yearly Research Assessment Exercises (latterly Research Excellence Frameworks) that influenced significant proportions of Government research funding. League tables proliferated within the UK but also internationally, prompting many universities to measure their performance, and often the remuneration of their Vice Chancellors, by international league table position.

7. Greater emphasis on output controls

Whilst this was used extensively in relation to project funding for which universities were required to bid, by 2015 it also featured as part of the way that both funding for research and for education were starting to be measured. Within the periodic assessment of research quality, the Research Assessment Exercise and Research Excellence Framework, the concept of 'research impact' was introduced, with 'high impact' research with wide commercial and societal impact being rewarded far more generously than the mere intellectual originality of it. In education,

Government commissioned research linking universities, courses and HM Revenue and Customs tax data to produce what became from 2016 the Longitudinal Education Outcomes dataset to measure income differentials over the decade following graduation for undergraduates at English HE providers.

Reshaping the habitus for HE privatisation: academic capitalism and the 'great university gamble' in English HE

Another feature of the period of HE development in the thirty years preceding the Green Paper was the adoption of a set of practice logics known as 'academic capitalism' within universities in the UK and US. First coined by Hackett in 1990 (Hackett, 1990) it came to prominence with the publication of the seminal work by Slaughter and Leslie in 1999 (Slaughter, S.A., 1999) a concept developed further by both Slaughter and Rhoades (2004), and a number of other scholars (Münch, 2014; Jessop, 2017, 2018; Fredricks-Lowman, 2020; Croucher, 2022; Beyer and Schmitz, 2023). The term was taken to define the ways that academic faculty and universities adopted market-like behaviours such as competing for funds from external sources. More philosophically it was argued by Slaughter and Rhoades (2004) that it moved universities from a 'public good knowledge regime' to an 'academic capitalist knowledge regime'. Fredricks-Lowman draws out the trend of universities to become more 'entrepreneurial' as a response to a globalised capitalist knowledge economy, defining entrepreneurial universities as being those 'that increasingly focus on revenue generation through the production of knowledge (e.g., innovative research, patents, marketable teaching materials) and academic are expected to contribute to the economic and social growth of their respective institutions.' (2020, p.23). Aligned closely to the application of NPM practice logics reviewed above, the literature also stresses the impacts of this upon academic faculty. Beyer and Schmidt for example demonstrating how the quasi-market measures and competition-focus impacts, and symbolically dominates, the academics working within universities (Beyer and Schmitz, 2023). Croucher also demonstrates, with empirical work interviewing staff members of Australian universities, how these views and values have become engrained internationally in notions of how to manage implement policy, manage universities and distribute resources.

The academic capitalism literature is mostly concerned, however, with the governance, and management of universities, the identifies and roles of academics employed within them and their activities to generate funds through entrepreneurial activities for reinvestment in the university and so says little in relation to the moves, at governmental level, to privatise higher education itself. While Jessop (2017) comes closer in his analysis identifying stages in the development of academic capitalism and entrepreneurial universities, his analysis is still examining the behaviours of principally public-universities and their role as financialised businesses, operating globally to maximise profits for reinvestment.

This changing experience of the expectations and practices of universities and academics, identified in the academic capitalism literature, is thus not directly related to the topic of this thesis, although it is important in demonstrating how such notions of market-orientations of universities and their staff are normalised

into the habitus of the wider field of higher education, and the expectation that universities will be connected with and contribute to the wider society and economy of which they are a part. This shifts the boundaries of the field and the beliefs about what is acceptable and unacceptable. As was discussed in chapter III and is considered in more depth in chapter VI, these doxa of the field make it easier for policy actors representing universities to become complicit in the symbolic violence done to their organisations, and in the economic violence that symbolic power conceals.

The significance of the Green Paper is its shift to *HE privatisation*. HE Privatisation is defined here as the opportunity, facilitated by Government, for private organisations and individuals to take financial profits from the delivery of HE.

The UK Government was also active in the period 2010 to 2015 in introducing measures that prepared the ground for the moment of radical change through a range of legal and regulatory measures that prepared English HE for privatisation. McGettigan (2013) in 'The great university gamble : money, markets and the future of higher education', shows through a detailed empirical work, how the 2010 Coalition Government began the process of preparing English HE for privatisation. Published in 2013 he predicted that the forthcoming HE Bill 'will be technical and presented as an attempt to rationalise arcane legislation. It will, however, be about new forms of privatisation, in particular, facilitating the entry of private equity into a sector that appears ripe for value extraction.' (ibid., p.viii). The intention was to use austerity following the financial crisis as an opportunity 'to create a wholly different *system* with markets determining what is offered...Faced with competition from profit-distributing entities with rich backers,' he argued 'it is not clear whether maintaining charitable status will be viable in the long run for most [universities].'(ibid., p5). Government went as far, in the period 2010-2013 as it was able to without legislation to do seven things:

1. Marketisation or external privatisation, whereby new operations with different corporate forms are allowed to enter the state system to increase competition
2. Commodification – the presentation of HE as solely a private benefit to the individual consumer
3. Independence from regulation [for private providers accessing the student loan book]
4. Internal privatisation – replacing public funding by *private* tuition fee income
5. The outsourcing of jobs and activities to the private sector
6. Changes to the corporate form and governance structures of universities
7. The entry of private capital and investment into the sector through buyout and joint ventures with established institutions

(adapted from McGettigan, 2013, p9)

Thus, in a set of very practical measures, Government acted to lay the foundations for privatisation, informed by a number of meetings with

representatives of private equity firms and education multinationals, with twelve meetings occurring with a number of such organisations in 2011 alone. The rhetoric of conservative politicians in this period, most notably David Willetts, Higher Education Minister and architect of the privatisation plans, acted, as with academic capitalism, to ready the field with a new set of discourse that stretched the concepts and doxa of the field. The practical measures taken also went further however, to stir the interest of private investors in the opportunity for profit-taking that was about to open up in English HE.

English Higher Education and NPM: The Missing Element

Clearly, many of the features of NPM were present in English HE in 2015. There was one critical dimension however that had not been implemented in the way that had been seen with NPM applied in other parts of the public sector. This related to competition between public and private for-profit organisations in the provision of HE. Indeed, it was not pursued with any great vigour within HE in the UK or elsewhere in Europe. Whilst Ferlie describes 'the encouragement of private sector providers to enter the markets' and the acceptability of 'market exit of failed public providers' as features of the classic UK-led NPM techniques (Ferlie, Musselin and Andresani, 2008, p335), there is little evidence of this in HE in the UK or much of the rest of Europe, in contrast perhaps to developments in other sectors such as health or utilities. The private company form of organisation, people management and leadership may have been fetishized in HE NPM reforms, but ownership appeared sacrosanct.

It was not expected that universities would be privately owned nor generate profits to pay dividends to shareholders: shareholders who might invest in business opportunities in the HE sector for the financial return and not necessarily for the social purpose of the organisations and would take their profits to spend elsewhere. Instead, NPM in HE was less about free markets and more about management techniques and governance at the meso-and micro-levels, between and within universities, and in encouraging competition between public sector players, not an expectation to overturn them. Reforms were 'market-oriented', or focused on efficiency in management and drivers to change behaviour – the tools of the market applied to steer and distribute funders from the State within a public sector (Enders, J and Westerheijden (2014, p180); Ferlie, Musselin and Andresani (2008, p328); Naidoo and Williams (2015)).

Such was the popularity of NPM as a public policy method, it outgrew its New Right roots and was applied by centre-Left governments across Europe (Hood and Peters, 2004, p271). Here was a way of delivering public services for parties across the political spectrum of left and right. In the UK, whilst NPM may have been more 'hard' than the contrasting 'softer' network governance models elsewhere (Enders, J and Westerheijden, 2014, p291), it was still the basis for a consensus on public policy that had endured for three decades; thirty years of incremental adaptation and development that established a new public policy orthodoxy, of quasi-market mechanisms and tools, applied within public-sector organisations in the HE realm.

This orthodoxy faced a fundamental challenge in the UK in 2010 with the approach pursued by a Conservative-led government dependent on its coalition partners, the Liberal Democrats, to be able to govern. Up to that point there had been an evolving political consensus of HE in England in relation to it having some responsibility for serving the public good. It was the predominant policy philosophy: from the seminal Dearing Report (Dearing, 1997); to the Labour Government's Higher Ambitions White Paper (BIS, 2009); and even the Browne Review of Higher Education (BIS, 2010) that heralded the arrival of a new fee regime, this approach endured. There was consensus too over how to achieve this: through the quasi-market mechanism of NPM, as Naidoo and Williams (2015) shows. In English HE, in contrast to NPM in other sectors and services in the UK, this was not exposure to the free market itself, not an agenda of private ownership.

In both university education and in schooling to the age of sixteen, whilst there were private providers of education permitted to practise, they could not be in receipt of public funding. Private schools had long been a feature of the education system in England and, other than through generous tax-breaks on account of their charitable status, they received no direct public funds. 'Academisation' of schools, under both Labour and Conservative governments, had applied NPM in accordance with the Ferlie model, permitting charitable organisations (but not profit-making ones) to provide school education. Such was the political significance of schools and universities, however, giving private sector operators the opportunity to provide school or university education was never attempted. Interestingly however, in further education (FE), for 16-18 year olds and adult learning, private operators had been permitted to compete with public sector providers to deliver education, training and apprenticeships funded by public money (BIS, 2016d). Uncovering the reasons for this is worthy of a separate research study in itself but is not the focus of this thesis. For those minded to extend the privatisation agenda into higher education, however, there were precedents, but not ones that had allowed profit making from the hallowed domains of schools and universities.

The completion of the NPM Project or challenge to it?

From 2010, a markedly different approach to public policy in HE began to be pursued. The majority Conservative coalition government began to establish a different way of delivering those aspects of public services which, since the start of the privatisation experiment in the 1980s, had remained in public ownership. Using the economic shock of the global banking crisis of 2007 to justify a period of austerity, and 'small state' public policies, private ownership was extended across previously public-sector domains. Attempts were made in different parts of government in different ways, such as with the privatisation of primary care services such that GP practices became profit-making companies. It might be argued that the end destination was clear but that it had been possible to progress it at different speeds in different parts of the public sector.

Higher education was one of those sectors to which this ideological project was applied. The vision for this policy was set out in the Government Higher Education White Paper of 2011 'Higher Education: Students at the Heart of the System' (BIS, 2011). The 2011 White Paper attracted particular headlines for its extension of

individual funding contribution and fees first introduced and then increased by the Blair-led Labour Government. There were also some further NPM methods proposed, but the significant policy discontinuity was in relation to private ownership. Private sector access was required (BIS, 2011, p46-53). The Coalition partners could not agree on the legislative framework necessary to implement the reforms effectively. The majority Conservatives were tempered by the influence of the Liberal Democrats members of the Government. The Liberal Democrats were sensitive to the subject of HE reform because of the party's abandonment on entering government of a pledge not to increase student fees charged to undergraduates. They were also uncertain about this break with the established norms of public policymaking, with a proposal that had featured in neither their manifesto nor that of their Coalition partner (Watson, D., 2015, p11).

It was not until the Conservative Party was re-elected with a single-party government in 2015, that, freed from the ideological constraints of coalition, the vision could be put into practice. Jo Johnson, the new HE minister, spoke in 2015 of there being 'considerable unfinished business' (Johnson, 2015) in relation to the vision set out in the 2011 White Paper (BIS, 2011) and of the need to 'bust this system right open' (Goodman, 2015). It was an approach that transcended developments in the field dynamics of wider politics with changes to the Prime Minister (from Cameron to Theresa May after the 2016 referendum) not altering the policy intent. Such was the commitment to the agenda, both the minister (Johnson) and the policy direction remained unchanged.

Conditions within the field of English Higher Education: New Public Management under stress

From 2010 onwards, tensions began to emerge in the functioning of the NPM orthodoxies in English HE policy. As has been seen, quasi-market management techniques were well established within the English HE system, yet there were still vestiges of old Progressive Public Administration (PPA) approaches to governance and public policy. In the field of quality assurance, much of the discussion from 2000 onward had been around Hood's NPM 'doctrine 4' (frugality and discipline in resource use) leading to accounting-driven assessments of the bureaucratic costs of methodologies to assessing quality of HE, with the goal to minimize such costs through the auditing of policy proposals through 'Regulatory Impact Assessments'. The approaches to reducing the costs of quality assurance drew on PPA notions of trust in established institutions, (universities), replete with trusted professionals (academics), who shared common values in the pursuit of continuous quality improvement, or at very least the maintenance of high academic standards.

Prior to the Coalition and Cameron Governments, private providers were largely charitable, and funds were kept in the UK public sector – they moved a little, between institutions, those institutions were more or less equal in their distribution of incomes through salary differentials, but there was limited private leakage. That changed, to the extent now that foreign companies now operate in the UK and export profits elsewhere, including tax havens.

As Government reduced controls on private sector providers, facilitating greater access to public funding through student loan income, a new breed of operator appeared on the scene in high numbers. Backed with private investment capital, their priorities were, necessarily, to maximise returns to their shareholders and owners. In this scenario, woolly, value-derived notions of consensus around quality as a shared goal, were challenged by profit-seeking enterprises which sought the boundaries of market regulation and quality control as the means to efficient operation and profit maximization. Where these boundaries were ill defined, it is perhaps unsurprising that many operators transgressed the notions of what was formerly regarded as acceptable, producing what was recognized as poor value for public investment (Morse, A, 2014; Morse, Amyas, 2017) and calls for revisions to the frameworks for quality assurance operated by HEFCE and its agent the QAA (HE-Commission (2013);Grove (2014)).

Other aspects of NPM came under stress in this period. Hood (1995) argues that a breakdown of trust in politicians led to the doctrine of creating separate corporatized units for each element of public sector delivery (doctrine 1) – as with HEFCE for HE in England for example. This led to an autonomy and independent powerbase for that unit, both pursuing policy orthodoxies, such as the value of widening participation, and methodologies (such as evidence-based practice and wider NPM techniques). With a strongly ideological drive from the governments of 2010 onwards challenging these orthodoxies in outcomes (though not in discourse), tensions emerged between the Minister and the NPM agency of HEFCE, increasing calls for reform or abolition of the organization itself. Broucker, De Wit and Verhoeven (2018) identify this tension as one of the ‘flaws’ of NPM within HE. They describe the tension as ‘the divergence between what policymakers want to achieve and the effects they create through the managers who have to implement that policy’ (p233). They argue for an alternative conception ‘beyond NPM’ to embrace the concept of ‘Public Value’ in a new model for HE, taking a wider view of the contributions of HE to society, and combining NPM with greater stakeholder engagement. This is more akin to the position NPM in English HE had evolved to, prior to the privatizing reforms from 2010 onwards that culminated in the 2015 Green Paper.

A more inciteful explanation comes from Bourdieu’s view of how tensions can emerge within a field and between one field and its supra-level field. It can be seen that HEFCE was the lead agent of Government in the facilitation of New Public Management (NPM) and academic capitalism. In contrast to the organisation it replaced, the University Grants Committee (UGC), HEFCE, from its creation in 1992 took a distinctly NPM approach to producing change in the sector, seeking to influence the way it was governed, funded, and managed. It sought to define the purposes of HE and to influence its practices from sector-level configurations to individual practices of individuals. Where the UGC had existed largely to distribute to universities the funds that it was felt they required, HEFCE developed over time a distinctly more dirigiste approach, supporting a broadly neo-liberal NPM agenda across HE and using economic, cultural and social capital to achieve its aims.

As Government sought to shift at a meta-level field an agenda towards privatisation from 2010 onwards, HEFCE, steeped in the habitus and doxa of the HE field that it

was used to exercising its powers to sustain, did not adhere to a new set of practice logics being asserted by Government seeking to produce a shift to a new paradigm. The powerful and useful body of an NPM era, that had taken the sector from an institutional autonomy insulated from the demands of wider economy and society, to see HE as central to all public good seeking activities, was now an impediment to a new era and needed to be removed.

English Higher Education in 2015 - A Context for Paradigm Change

To conclude, the hegemonic dominance of the New Public Management model in public policy, and English HE policy more particularly, is important as context for this thesis. First, because, given the length of time it was applied, over thirty years, it was all that most policy actors had known as the established ways of doing things for the whole of their careers. To understand New Public Management is to understand a significant part of the habitus of English HE policymaking in 2015. As Bourdieu states, it establishes '...the unconscious principles of the ethos which, being the product of a learning process dominated by a determinate type of objective regularities, determines "reasonable" and "unreasonable" conduct for every agent subjected to those regularities.' (Bourdieu, 2013, p77).

Second, the recent historical context to the HE Green Paper of 2015, defines the discourse, policy arguments and key texts that were prevalent at the time, with NPM defining both the policy questions that were not asked as well as those that were. Finally, it is important because the stresses that appeared within the system from 2010 onwards developed a consensus, from a number of competing perspectives, that significant change was necessary, even if there was no clear consensus over the direction of that change.

Conditions were primed for acceptance of radical change, with apparent support from stakeholders that might be identified as at risk of losing in a new paradigm and who thus might have been expected to be in opposition. Whilst a direct assault on, (or violence towards) the economic interests of these stakeholders, might not stand a great chance of success, application of symbolic power, using the values, discourse and what Bourdieu might describe as 'symbolic violence', may be able to produce the final, often-unrealised, goal of the neo-liberal project – the extension of private profit-making to the field of education - higher education.

Chapter V: The Green Paper

Introduction

This chapter is the synthesis of issues arising from the use of CDA to analyse the Government policy document 'Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice', referred to hereafter as 'The Green Paper'. The detailed analysis and annotation of the paper, analysing in depth the discourse point by point, is attached at appendix two as an example of the depth and methods employed. This chapter itself seeks to draw out the key themes from that analysis in relation to the use of policy discourse technologies, illustrated through examples of discourse used in the text. This approach to documenting the outcome of CDA analysis is typical of CDA literature (see for example Fairclough, N. (1993), in his analysis of marketized discourse in recruitment advertisements by universities).

The structure of this chapter is as follows: First there is a short synthesis of the narrative of the Green Paper, the 'surface text'. Whilst the focus of this paper is on the discourse and the 'hidden text', some appreciation of the context and content is helpful and illustrates the extent to which CDA methods can give a deeper understanding of a piece of discourse than if read without it. Furthermore, the relationship between the discourse and the social conditions of its creation, and the relationship between texts and between discourses (inter-textuality and inter-discursivity) are key to the CDA method. The methodology and methods of CDA of written discourse are then recapped, followed by an analysis of the different types of discourse in use, organised according to Fairclough's typology.

The value of the methodology is then considered, in the light of the experience of applying it, and suggestions made as to additional categories that might augment and strengthen the Fairclough model, together with examples of their usage. The chapter then sets out reflections on the use of Fairclough's Three Dimensional Model for understanding the Green Paper, including a precis of the augmentations proposed to it. It concludes with a 'CDA-reading' of the Green Paper to compare with the 'surface-text' reading.

The Green Paper – a synthesis of the narrative of the surface text

The Green Paper starts by stating that Higher Education is 'one of our country's greatest strengths' (BIS, 2015, p.10) but argues the sector needs to evolve if it is to continue to fulfil its potential. Across over one hundred pages of text, the document analyses the issues and problems Government believes require new policies to address and goes on to make proposals for changes in a number of different areas. The paper is a consultation document asking for responses to a number of questions about the policy proposals put forward. After policy proposals are put forward in four 'Parts', consultation questions are summarised and restated, with information for readers on how they can respond and how their data will be used. Four appendices follow the main document: an equality analysis; a statement of the principles adopted to direct the management of the consultation

and details of how to comment or complain about the way it has been carried out; a form for respondents to complete to reply to the consultation; and a list of the organisations or individuals consulted in the development of the Green Paper proposals.

The Green Paper sets out its rationale for change and then makes detailed cases and explanations for new policy in four areas:

- A. Teaching Excellence, Quality and Social Mobility
- B. The higher education sector
- C. Simplifying the higher education architecture; and
- D. Reducing complexity and bureaucracy in research funding

The arguments that provide the rationale for policy change are summarised briefly here:

- Productivity in the UK suffers because graduates add less value than Government believes they could;
- Better information is needed to inform the choices of student customers in the market for an HE experience;
- The incentives for HE providers to improve the quality of teaching are too weak; and
- The extent to which HE boosts social mobility is too limited.

The Paper explains that under the 2010 Equalities Act the authoring Government department is required to give due regard to equality issues, which it states it has done and finds no negative impacts. Further, it explains the Green Paper's compliance with 'The Family Test' that was introduced in 2014 to bring an 'explicit family perspective' to all policy, stating that having assessed this, the paper has no significant effect on any of the defined family perspectives. It concludes with a note on the scope of the consultation, and clarifies some wording and definitions used.

Forms of discourse employed in the Green Paper: Methodology and method reminder

This section will analyse the discourse of the Green Paper using Fairclough's three-dimensional CDA methodology. The methodology and method employed has been discussed at length in an earlier chapter. To recap, the discourse from the Green Paper is analysed through the nine principal categories of discourse technology identified by Fairclough and detailed in the table in appendix one: interactional control; modality; politeness; ethos; connectives and argumentation; transitivity, theme, and nominalisation; word meaning; wording; and metaphor. Where relevant, sub-categories are also used: connectives and argumentation is sub-divided into reference, substitution and ellipses, conjunction, and lexical cohesion; Transitivity into relational, action, event, and mental; and metaphor into simile, personification, and metonym.

This section uses this analysis to discuss the Green Paper through consideration of the use of the different CDA categories of discourse, to reveal the different ways that the authors have used discourse technologies to achieve their aims. Examples

are provided to illustrate the basis for the conclusions drawn, rather than a catalogue of every coded instance. In the course of the analysis a number of additional types of discourse technologies were identified that do not appear within Fairclough's CDA methodology but which, it is argued, are a valuable enhancement to that methodology in understanding and analysing policy discourse. These will be discussed in this section and applied and refined in examination of the other policy documents produced by both Government and non-Government policy actors.

The Green Paper has been coded against the Fairclough CDA categories, as well as the potentially new types of discourse technologies identified through the analysis, with each phrase, sentence or paragraph being coded against multiple categories where they apply. The proprietary software for qualitative analysis, NVivo, has been used, using the latest version available at the time, which was NVivo v12 for Mac. Annotations and notes were added to each coded section discussing the particular issues associated with the selected piece of discourse. Over three-hundred and forty such notes were made. Together, this provides an in-depth discussion of all identified pieces of individual discourse in the Paper, running to in excess of 25,000 words. This analysis, organised in a linear fashion, from the coding of the first to the last pages, is provided at appendix two in order to demonstrate the source analyses that inform the synthesis shown in this section.

Originally, as the main focus of the thesis has been on the privatisation of higher education and the use of discourse in the Green Paper to achieve it, it was not intended to analyse the final 'part' of the Green Paper, concerned as it was with some matters relating to research funding and administration. Having coded the rest of the document, however, it became apparent that there was a 'meta-narrative' in the document, where different parts were counter-posed against each other, with each serving a purpose in what is argued is the primary purpose of the Paper – to support the privatisation of taught HE. In this context, it was felt appropriate to analyse and code this final section to understand its contribution to the whole.

Whether by accident or design, the Green Paper is remarkably coherent, almost in its entirety, and as such represents a good example of quality policy discourse. There are few examples of policy initiatives included that do not make a contribution to the principal narrative, including the final part relating to research. The technical annexes: the equality analysis, consultation principles, consultation response form; and list of individuals/organisations consulted have not been coded. They clearly have some impact in terms of interactional control however and relate strongly to the CDA themes of inter-discursive chains, inter-textuality, and Bourdieu's notion of fields, habitus, and field hierarchies. These are discussed later in the section. In contrast to other forms of discourse analysis, the messaging in the surface text has not been coded, as this thesis is concerned with the hidden text 'revealed' by CDA techniques.

In the conclusion to this section, an alternative reading of the Green Paper is presented, based on what has been learned from the CDA analysis, to contrast with the 'surface' reading presented in the preceding section.

A close analysis of the discourse using Fairclough's three-dimensional model of Critical Discourse Analysis

This section illustrates the use of different discourse technologies, using the nine principal categories of the three-dimensional method: interactional control; modality; politeness; ethos; connections and argumentation; transitivity, theme, and nominalisation; word meaning; wording; and metaphor. In addition, examples of inter-discursive links and inter-textual chains and discussions are highlighted and discussed below.

Interactional control

Interactional control in relation to the policy proposals starts with the designation of the paper as a 'Green Paper' – a form of UK Government 'Command Paper' that signals a paper that will contain a number of ideas for consultation, as opposed to firm policy initiatives or proposals for legislation which would be classed as a White Paper (UK_Parliament, 2021) which typically follows sequentially after responses to the Green Paper have been considered. This signals to readers that responses are invited and that there is some room for influencing Government policy, where proposals are 'still at a formative stage' (Public Information Office, 2010). Policy consultations are on the one level themselves openly an exercise in interactional control: they typically set out a number of policy proposals and ask questions relating to the proposals that have been put forward.

It should not however be assumed that this openness extends to inviting free, unfettered comment from all parties. Green Papers, such as this one, can exercise interactional control in a number of ways: first, through signalling at the start of the document who the document is likely to be of interest to – implicitly discouraging those who are not mentioned from reading on; second, a policy document may inhibit responses through the use of technical language that is comprehensible only to those policy experts, working within a particular field who understand both the form of discourse, the language and its place in inter-discursive chains (discussed below); thirdly, the posing of questions exerts interactional control through framing and steering the responses. Questions may be open: such as

Question 8: Do you agree with the proposed approach to differentiation and award as TEF develops over time? Please give reasons for your answer. (p29)

An approach that can also be continued within the body of the text:

This consultation is not prescriptive about the metrics that could be used– this will be the subject of a technical consultation to follow. But we would welcome your views on the broad principles outlined in this chapter. (p31)

It may guide towards particular logical conclusions such as :

Do you agree with the proposed deregulatory measures? Please give reasons for your answer, including how the proposals would change the burden on providers. Please quantify the benefits and/or costs where possible. (p68)

Here, the question and its framing leads the respondent to particular conclusions. The changes are described as 'deregulatory measures'. Having made the case in the preceding paragraphs for the value of the proposals in reducing burden and having

framed the discussion of the costs of the pre-existing system with a (claimed but not evidenced) reference to HE sector compliance with the Freedom of Information Act costing £10m, the question then asks about those specific dimensions of the proposals.

It may address questions at a different level to the level expected from the policy proposal, apparently asking questions about a proposal but diverting attention towards the implementation and operationalisation of the policy or policy principle, as opposed to the higher-order question of whether the policy is appropriate or desirable, such as here:

Where relevant, should an approved Access Agreement be a pre-requisite for a TEF award? What other mechanism might be used for different types of providers? (p22)

where the question raised is an open one, caveated, which invites clarification from users. 'Where relevant...'The text assumes the agreement of the reader with the ethos of the question and signals a willingness to receive suggestions as to how to do it - supposedly the purpose of a Green Paper. From a policy power perspective however, it draws attention and time to the question - a question over which there is little controversy at a principle level, inviting attention to the operational level that is of lesser policy consequence.

Or here where the question asks about 'the proposed approach', i.e., the method - rather than the principle - of financial incentives, avoiding that more fundamental question:

Do you agree with the proposed approach to incentives for the different types of provider? Please give reasons for your answers. (p30)

Interactional control may be exercised through an absence of a question (as the most extreme form of interactional control) such as this:

Do you agree with the proposals on...

b) the incentives that should be open to alternative providers for the first year of the TEF (p25)

Here the paper does not actually specify what the incentives will be for alternative providers - there is a vagueness, with reference to later sections in the paper despite the question being posed at that stage. The question is framed not seeking a response to whether incentives *should* be open to alternative providers but asks about *which type* of incentives should be provided. It asserts in the form of the question that incentives are things 'that should be open to alternative providers...'.
Modality

'Modality' refers to the strength of endorsement of a particular statement, through modal auxiliary verbs, adverbs and tentative or assertive verbs. Unsurprisingly, the modality changes throughout the document depending on the desired effect – whether to emphasise or de-emphasise – so a simple count across the whole document reveals little without the context of their usage, but attention to the fact of their usage is valuable in critically considering why the author is using emphasis

or otherwise at a particular point in the text. The qualifying adverbs and auxiliary verbs are subtle but significant.

There are many examples of their usage in the Green Paper:

The proposals set out in Part B are designed to remove the unnecessary barriers that prevent high quality providers from entering the sector and expanding their provision, while ensuring value for the taxpayer (p14)

Here the document is clear that there *are* 'unnecessary' barriers as opposed to the less assertive 'any unnecessary barriers'. The relationship between value for money and removing barriers to entry is subtly established, suggesting that the two are connected, when evidence at that point (from a report published by the Public Accounts Committee (Public_Accounts_Committee, 2015)) showed that the new providers offered the very poorest value for the taxpayer.

Or here, where, in a familiar theme throughout the document, overt criticism of research-intensive universities is avoided:

The TEF should bring better balance to providers' competing priorities, including stimulating greater linkages between teaching and research (where they don't already exist) within institutions (p20)

This statement is arguably designed to make a number of readers conclude 'they don't mean us; we are not going to need to change' by the qualifying sub-clause in parentheses because all can claim that there are connections between teaching and research.

Or in chapter 2: Assessment process, outcomes and incentives relating to the TEF, the dominant modality for the propositions in the section suggests a low level of concern for the way that the policy might be implemented: 'Our preference is...', 'We think...', 'We are proposing...', 'We envisage...'.

Qualifying auxiliary verbs are also worthy of note in demonstrating apparent inconsistencies in the cohesion of the document:

Ensuring that a provider is financially sustainable is an important safeguard for students and for public funding – but a balance needs to be struck between student protection and the three-year track record that may be delaying entry. One option would be to reduce the three-year track record to two years, but this would allow for a very limited view of sustainability over time and would give considerably less confidence. This might be more acceptable if accompanied by some form of guarantee of student protection as a condition of designation, both financial and in terms of how students would complete their course. (p51)

It is interesting to note that in relation to the financial sustainability of private providers, the proposals are far more cautious and less ideological, without an assertive statement of the value of new providers entering the market quickly, as in other paragraphs. It may be that in respect to financial liabilities, the influence of Treasury, concerned over the potential costs to Government for having to compensate or cover the recovery costs of failed private providers, tempered the discourse and the substance of the proposals as a condition of agreement of the policy.

De-emphasis is also used to make major changes seem less significant:

To ensure the system architecture works efficiently and effectively, we propose that the Secretary of State will have the following statutory powers and duties. The majority of these are existing powers, or mirror the powers and role of the Secretary of State in relation to HEFCE in the current system. (p64)

This paragraph de-emphasises the significance of the 'proposed statutory duties and powers of the Secretary of State' with the second sentence 'The majority of these are existing powers, or mirror the powers and role of the Secretary of State in relation to HEFCE in the current system.' Two words are key: 'majority' and 'mirror'. It is not generally the number count of powers that are important but the significance of the reach of a designated power. Similarly, the term 'mirror' is vague, allowing space for changes of emphasis.

Linguistic modalities can also be used to signal a genuine lack of policy intent, to placate influential stakeholders, such as in this section on research funding:

The Government has already asked Sir Paul Nurse to undertake a review of the Research Councils and this review has not yet concluded. Sir Paul's review is considering how the Councils can evolve to support research in the most effective ways – reflecting the requirements to secure excellence, promote collaboration and agility, and in ways that best contribute to sustainable growth. We are not pre-empting Sir Paul's review in this document, but recognise that the proposals in this consultation would affect the future design of the research system. Sir Paul's recommendations will be a critical input alongside responses to this consultation. (p70)

The paragraph is almost deferential in its policy aspirations. It references a review of Research Councils, mentioning the chair of that review by name and subsequently referring to him as 'Sir Paul' on three occasions. It clarifies that Government is 'not pre-empting' this review, which will itself be 'critical' in deciding what goes into the White Paper.

Politeness

Closely related to consideration of modality of verbs, 'politeness' examines the forcefulness of statements. This can signal particular strength of feeling which can be asserted, or to signal a subservience or openness to challenge. In both cases, CDA would suggest there is value in looking at which powerful stakeholders are being placated, where 'politeness' is used to avoid engendering a forceful counter response in the consultation from a stakeholder with power. There are two forms of this to draw attention to in the Green Paper: the first relates to the level of assertiveness in the statements in different sections: in a first example, in the sections on the TEF and widening access, views are sought and suggestions welcomed. In the contrasting second instance, in the proposals about the benefits of new providers entering the market, there are bold statements and assertions of advantages without evidence. In the section on research funding (where the intention is arguably to strongly signal that no change is intended) the tone is different again and almost subservient, with extensive referencing, attention drawn to independent bodies supporting the Government's position and the repeated referencing of an individual chair of a review running concurrently with the Green Paper publication (Sir Paul Nurse).

Contrasting approaches to using discourse to signal different levels of assertiveness are also evident. For example, low assertiveness is demonstrated when discussing equality, widening participation and the form of the TEF:

'We will consult on criteria in the technical consultation but purely as an example of what might be considered, we could look at criteria such as:' (p32)

'We are not being prescriptive here about the additional evidence providers might want to offer and will consult further in the technical consultation but these might include:' (p34)

'What are your views on the potential equality impacts of the proposals, and other plans, that are set out in this consultation?'(p16)

'Question 6: Do you agree with the proposed approach, including timing, assessment panels and process? Please give reasons for your answer.' (p29)

High Assertiveness is evident in discourse around new providers, including in the avoidance of issues for discussion in the questions posed:

'Do you agree with the proposed risk-based approach to eligibility for DAPs and university title? Please give reasons for your answer. b) What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs?'(p50)

Discourse is also used to signal subservience:

'The Government has already asked Sir Paul Nurse to undertake a review of the Research Councils and this review...Sir Paul's review is considering...We are not pre-empting Sir Paul's review in this document...Sir Paul's recommendations will be a critical input alongside responses to this consultation. ' (p70)

As noted above, the paragraph is almost deferential in its policy aspirations, not proffering any policy proposals until the review led by 'Sir Paul' is concluded.

A further example relates to the discourse signalling that reforms are not intended to impact significantly upon the fortunes of research-intensive universities. This probably relates again to the power of that grouping of universities within the wider field of public policy and the desire not to stir opposition from it, but also an interest to not produce unwelcomed changes in those university institutions that members of the Government cabinet had strongest links with – a matter explored further later in this thesis. Again, examples of this are shown here:

'There are a number of possible options for the future design of the research landscape. These range from delivering the dual support funding system through separate bodies as at present (with another body taking on HEFCE's research role) to delivering dual support through an overarching body that brings together Research Council functions with management of institutional research funding for England. If there were separate bodies we would expect much closer strategic and operational co-operation between them. In the case of an overarching body, we would place conditions on the funding (for example separating each stream) which would ensure the integrity of the dual funding system. Reducing back office costs and administration would apply under any option, building on the programme of work that is already underway in this area, led by Research Councils UK. Our decision will be guided by the findings of Sir Paul Nurse's review and the responses to this consultation. '(p71)

Government would appear, in the concluding paragraph of this chapter, to be keen to stress what little it intends to do in relation to research. The message is that it is creating continuity in research activities while making adjustments in teaching that will affect non-research-intensive institutions which will be the subject of increased competition. 'Sir Paul Nurse' is referenced again, as is the commitment to other pre-existing ways of working and institutions within the landscape.

Similarly in the section that follows it, on the Research Excellence Framework, there is no reference to the proposed Teaching Excellence Framework (the TEF). This might be surprising given the arguments earlier in the Paper about mirroring the REF with the new TEF, as might have been the intention if a coherent whole were intended for the HE system. Whilst it was probably written by a different set of authors and consultees, it does perhaps reinforce the view that the purpose of 'Part D' was to assure powerful research-intensive universities that the reforms as a whole will not damage those things they care about, and the purpose of Part A was not to be a long-term feature of the HE landscape but to divert attention away from the radical funding reforms in part C.

Earlier in the document, in the section on boosting social mobility, the discourse reveals the acceptance of a view that is most favourable to research-intensive institutions:

'While we want to maintain – and even improve – the strong standing of leading UK universities in global league tables, this must not be the sole measure of success for our higher education system. We must also ensure that we drive up the quality of teaching, and the associated outcomes, in the providers across our higher education system who are actually responsible for boosting social mobility for the vast majority of tomorrow's graduates.' (p13)

Global league tables measure research quality and impact. The paragraph is effectively saying therefore that: our research universities do very well here, and despite not being a good proxy for value in teaching, are probably actually really a very good proxy, because 'we must also ensure that we drive up the quality of teaching...in the providers across our higher education system who are actually responsible for boosting mobility for the vast majority of tomorrow's graduates'. So, the providers who educate the majority, are not in the world rankings, and are by implication in need of having their quality improved.

Ethos

Ethos relates, in CDA analysis, to the way that authors signal or conceal their own social identity and values. Within the Green Paper there is considerable usage of 'virtue-signalling', or seeking to identify policy proposals with values or positions about the purpose of higher education that many respondents would agree with. It is argued that the purpose of this signalling is to engender an emotional reaction in respondents to the proposals, so that they regard them as being in keeping with their own values, while avoiding making concrete policy proposals that might actually further those agenda. In the first example below the demonstration of ethos is more obvious – a commitment to widening participation and social mobility which anticipated readers of the Green Paper are likely to be supportive of:

Widening participation in higher education is a priority for this Government and will help to drive social mobility. This Government believes that anyone with the talent and potential should be able to benefit from higher education. (p36)

A more sophisticated usage is later in the Paper, where the surface text gives the name and focus of the new HE regulator:

‘At the centre of the reforms to the system architecture is the creation of a student champion in the form of an Office for Students (OfS). This chapter sets out the Government’s plans for the OfS, including its purpose, duties and powers, and legal form.’(p62)

Here, the author is ethos signalling through the words chosen to name an organisation exercising power within the system. As such it should be scrutinised as to whether there is congruence between title and function, or alternatively, whether the title has been chosen to convey a message and *conceal* the real intent.

Connections and Argumentation

The form of argumentation in the Green Paper is typical of Government policy consultations in England. There is a strong logical form for the paper as a whole, as can be seen by the summary of the surface text arguments in the section above. Other than with a few aspects of what might be described as ‘pork-barrel policymaking’, where minor, almost unrelated aspects of policy are dropped rather incongruously into a bigger piece of policy, there is a strong coherence to the document. A reading of the whole document demonstrates the significance of all sections to the argument as a whole. Fairclough’s recommendation to look at the structure of the argumentation reveals a significance to the final Part of the document, in the discursal sub-text, which it may otherwise have been possible to overlook. Where a document follows a strong logical argumentative form, where each section builds on the next after the strategic intent is set out in the introduction, it would be surprising if the last Part were unrelated. It appears unrelated on the surface text: it is about research funding regulation and proposes no significant policy changes. When considering the power dialectics between actors within the sector, it takes on a greater significance – to placate the powerful research-intensive universities – the apparent lack of argumentative coherence should be taken as a prompt to pause and scrutinise, for the critical reader.

The document uses the personal pronoun ‘we’ to describe the intentions, plans and beliefs of Government. This may be more significant in analysing other forms of discourse but is conventional in policy consultations and so is of far lesser significance to a critical reading of the Green Paper.

There is some substitution and use of ellipses in the Green Paper. Both devices create increased coherence and a flow to the document that whilst making it easier to read, also causes the reader to slide over points of policy significance. A typical substitution, such as ‘Students make choices about where to study, they must consider a range of sources of evidence’ or ‘The evidence of graduate outcomes is available from destination data. It is collected annually.’ adds little to the discourse. There are a number of incidences however where vagueness in terms, often supported by substitution and ellipses, de-emphasises the significance of points present in the surface text, which should prompt the critical reader to explore more

closely whether these coherence discourse technologies are designed to influence the reader.

Arguments, and conjunctions made between points, are also used to build logical arguments in forms expected by the readers. The example below follows a typical form: Following A, B has occurred but C has prevented it from achieving D. This sets up an expectation from the reader that E is required to enable full potential F to be realised.

‘Since reforms to the higher education sector in 2012, student choice has become a key driver of change. But imperfect information about teaching quality, course content and graduate outcomes makes it hard for prospective students to make decisions on which courses to take or where to study.’ (p11)

In some cases, the discursal form is used even where the points do not flow as naturally as one might expect, pointing to the power of the discourse technology in the absence of policy logics, as in the following paragraph

‘Current information is piecemeal and doesn’t allow reliable comparisons to be made on teaching quality. For example, HEFCE research found student satisfaction with teaching was seen as the most important information given to HE applicants. 16. However, at present students and employers must rely on imperfect proxies rather than a robust assessment of teaching quality. In developing our thinking about measures of teaching quality, we have asked the Office for National Statistics (ONS) to review the robustness of data sources that will underpin the metrics used in TEF to ensure they are used to best effect and to make recommendations, where appropriate, for their future development.’ (p20)

The paragraph takes the form 'statement of a problem; evidence source to support it; proposed action to resolve the problem.' In this instance, however, the evidence does not logically connect to the action proposed to resolve the 'problem' that is asserted. Here, research findings report that student satisfaction is the most important information desired by HE applicants to inform their choice. This information has been gathered since 2005 in the National Student Survey. The proposed action relates not to more or more precise data about satisfaction, as preferred by prospective students, but to 'objective' measures of the quality of teaching, defined by an expert quango, the Office for National Statistics. Thus, the argumentative discourse form is taken in order to encourage acceptance of the action, where evidence to support the argument is lacking.

Transitivity

The three types of transitivity identified by Fairclough: action, mental, and relating to events all feature within the Green Paper discourse. The first highlights how the discourse sets up the relationship between actions and actors. As indicated above, vagueness in the connection between actor and action is often used. For example, in the sentence below, whilst the Paper defines Government as the actor, the verbs and their object are vague, with no specificity as to what 'looking at the case for' or 'the more expensive applications and processes' relate to:

‘The OfS would devise the precise subscription model, but we would include protections to ensure it is based on student numbers to prevent it forming a barrier to entry. We will also look at the case for additional fees to be charged separately, for the more expensive applications and processes.’ (p63)

This vagueness is also used elsewhere to powerful effect. In the sentence below the modality is almost triumphant, but the text is ambiguous as to what the 'very significant step' is a step towards.

'This approach would represent a very significant step in creating truly competitive provision for higher education in England.' (p46)

It states it is a significant step 'in creating truly competitive provision for higher education in England.' Where the 'higher education in England' is 'truly competitive' it would logically be competitive in relation to HE in other countries outside of England, something likely to be supported by readers. It does not say that it is creating 'a market with true competition *between* providers of HE *in* England. Though this would appear to be its intention with the policy. The ambiguity in the discourse is advantageous to the argument, enabling it to appeal to different audiences simultaneously.

In relation to events, in subject-verb clauses, there is limited use of indefinite article, where the direct object is suppressed. Similarly, in relation to mental transitivity, whilst there are many cognitive verbs in the document, they are occasionally used to convey strength of feeling or moral responsibility, though with relatively little power:

'Students right want hard work at university to be recognised...', 'Businesses need a degree classification system that will...' (p25) or 'A level playing field for all providers who will sign up to our expectations around student protection...' (p42)

As such these two technologies represent features of policy discourse that could have been more powerfully deployed by the authors.

Theme and Nominalisation

The assumption that certain propositions are self-evidently correct and 'common sense' is repeated throughout the document. These are not challenged, and it is not thought to pose questions in respect to these elements. For example:

'These arrangements are now out-dated and unnecessarily restrictive and burdensome. As a consequence, they can stifle innovation and growth and slow down institutional change. They are also inconsistent with the Government's commitment to establish a level playing field in higher education.' (p66)

In this excerpt, a number of concepts are taken for granted as common sense: change is good, innovation is good, growth is good, and any restriction on enterprise is bad. There is an assumption of the supremacy of the private enterprise as the favoured organisational form amongst the various forms that co-exist in the English HE system.

It appears from the text that whilst in some cases the argument that something is 'common sense' is known by the author and made as an explicit case, in other instances, the assumption is made but it appears more to arrive subconsciously, perhaps as an example of the habitus of the Government policy and political elite accepting the field logics without question. In the following example, it is taken as common-sense that the interests of 'employers' should be prioritised in the new HE system being created despite the fact that employers made no 'investment' in that

system, which in the surface narrative is shaped to adopt market logics of customers and sellers:

'In creating a simpler and more efficient higher education system architecture and regulatory framework the Government will: Ensure the system promotes the interests of students, employers and taxpayers to ensure value for their investment in education...' (p57)

Removal of the actors (nominalisation) is used occasionally in the Paper. For example, in the excerpt below,

'As a result of regulatory activity from the Office for Students. We would expect this to occur very rarely, reflecting the wide range of compliance mechanisms available to the OfS which would not generally result in exit. If regulatory activity is potentially going to lead to exit, this should be clearly signalled, so that students are able to make informed choices before exit happens.' (p54)

Here Government policy appears to desire provider exit but to absolve itself of responsibility for it happening, suggesting that the actions of the agent of Government 'would not generally result in exit' (p54). Equally, Government intervention to prevent it is regarded as undesirable in most circumstances. The presentation removes Government as an actor, in what will be a heavily regulated market, in order to suggest that outcomes are a result simply of 'market forces' at work. This is a piece of policy discourse revealed through CDA, when in reality there is political action at work when Government desires the exit or entrance of a provider.

It is not a technique used as extensively as in some other Government policy documents, however, such as those analysed by Fairclough in 'New Language New Labour' (Fairclough, N., 2000). This perhaps represented a second area where the policy discourse could have been more powerful were it to have employed some of these techniques.

Word-Meaning

The meaning ascribed to particular words is subtly adjusted in a number of instances in the Green Paper. This is used in conjunction with signalling apparent affinity with particular values associated with those words but then appropriating them for an alternative purpose.

An example of this would be the meaning of the word 'diversity'. The word is commonly used in HE discourse associated with a diversity in ethnic and class backgrounds of students in HE, something commonly perceived as being a good thing, given the under-representation of a number of groups within HE in comparison to their representation in society. In the Green Paper, it is used in those terms in the earlier sections but then used to refer to diversity of organisational type, in the latter stages. The same assumption that this is a positive feature of HE is carried from the former usage to the discourse framing its latter usage. As exemplified here, where the 'principles of diversity' that are to be 'embedded', morphs to 'diversity in provision', itself a masking of the real meaning of 'bring new private providers into the pool of providers':

'The proposals...will need to be supported by a higher education system which embeds principles of diversity, choice and quality. The system also needs to reflect the reality

of today's higher education sector, where the majority of funding for course costs flows through students. The current higher education architecture was designed in a very different era. We propose to transform the regulatory landscape to put students at its heart and create a simpler and more effective higher education system. ' (p14)

'The TEF should bring better balance...Better student choice and better-informed employers are also likely to lead to greater diversity in provision. ' (p20)

A second example relates to the meaning of the term 'champion' in relation to protecting and promoting the interests of students in the new system. It might be assumed that the most effective 'champion' of students would be students themselves, organised in order to aggregate and represent their purchasing power in the market.

The student-led organisations in existence that are democratically elected by and representative of students are however not trusted within the 'new architecture'. Instead, it is proposed that a new NDPB, the Office for Students, is charged with 'championing' the interests of students. It is arguably the intention not to see customers exert their market power through self-organisation but to control the influence of the student within the new system. That influence is bounded by an NDPB with a remit defined by the Secretary of State. That NDPB is also to be answerable to the Secretary of State in a far greater way than the predecessor body HEFCE was. It is proposed that the purpose of this was to ensure organised consumers neither challenge the creation or shape of the 'architecture' nor sufficiently challenge the influence of capital within the new system. The choice of title of the new NDPM, the Office for **Students** uses a further discourse technology to compound the concealment.

Wording

Choice of wording is important. There is a lexicon of favoured words in policy discourse and those that are unfavoured, with 'common sense' usage of a number of them almost flowing naturally in drafting 'reduce bureaucracy', 'streamline processes', 'safeguard reputation', 'modernise' [anything], 'remove barriers'. The terms are used extensively and repeatedly throughout the document, irrespective of the actual reforms being proposed, which arguably disempower, increase regulation, add to administrative burden, increase risks to reputation, and cost the taxpayer money.

The most important use of wording as a discourse technology in the Green Paper relates to the description of different types of organisations that are involved in higher education. At the start of the document, there is a disclaimer, in the introduction, that the terms 'institution', and 'provider' are used interchangeably, suggesting they are synonyms 'to mean all higher education providers' (BIS, 2015, p16). A closer examination shows that they are used in different ways throughout the document to support different types of argument, whether to empower or disempower, venerate or denigrate, the organisations in question. The qualifying adjectives are also important in this process. In all, eleven different descriptions of HE organisations are identified. These are listed below, with a summary of where they are used and the purpose served by the particular naming.

i. Institution

Used notionally in generic terms, but really when seeking to refer to or speak to: organisations that there is public interest in protecting (e.g., p54, p66); organisations that are a feature of the 'old' system (p58); organisations that do valuable work in the form of research (p73); and those organisations whose 'autonomy' should be 'protected', implicitly referencing universities (p64).

ii. Provider

Used to refer to all organisations providing higher education and particularly when seeking to establish a parity between established universities and 'alternative providers'.

iii. Alternative providers

Used over fifty times throughout the document to reference those organisations that are subject to restrictions which need to be lifted.

iv. New providers

Used twenty-two times. Deployed when signalling the association of non-university or non-college providers with dynamism, innovation, high quality and the need for a 'level playing field' on which to compete with and replace 'incumbent providers' who may be 'exiting'.

v. Incumbent providers

Used (on pages 14,43,47, and 49) to describe established universities when criticising them for restrictive practices (practices previously a desirable role of 'quality assurance') in their roles as validators of provision by others leading to degrees awarded in their names

vi. Universities

Notionally used to describe any provider with the status of 'University', reference to 'universities' is used when wishing to speak directly to university readers. It is used when discussing the 'world-class' nature of the 'HE system', when describing positive features of higher education usually equated with universities active in research. In each instance it could be that the more generic 'provider' could be used but using 'university' instead speaks to those institutions more directly, praising them and signalling, to research-intensive institutions, that they are not expected to be significantly affected by the reforms.

vii. College(s)

Used in descriptions of the 'old' system that is to be changed, together with 'universities and...' to describe all providers that are not universities, or in explanation of the differences between 'university' and 'university college' in what is described as an anachronistic feature of the system that needs to be altered. Further education colleges are mentioned when clarifying that regulations apply to them as well as other HE providers. They are not mentioned as major established and high quality providers of HE outside of universities and university colleges or alongside any discussion of the 'new' or 'high quality' providers that are to be liberated by the new reforms.

viii. High quality providers, high quality alternative providers, the highest quality alternative providers, and high quality new providers

The prefix 'high-quality' (pages 8, 14, 42, 49 and 60) or 'highest-quality' (pages 42 and 53) to 'providers', 'alternative providers', and 'new providers' is used to give discursive emphasis to the value of particularly contentious proposals in relation to removing 'barriers to entry'. It is not used to signal a subset of the totality of providers which offer the highest quality of provision, but as a synonym for 'all new providers'.

This section has explored the use of particular wording. It is the most obvious form of discourse technology and the one used most extensively, almost crudely, within the Green Paper, to reinforce the views and values of those proposing the policies.

Metaphor

There is some, but not extensive, use of metaphor in the Green Paper. Interestingly it does not appear to have been a major discourse technology deployed by the authors – although the analysis reveals fifteen different metaphors for higher education used in the whole document. These are:

1. HE as a 'landscape' (e.g., p57)
2. HE as a living thing, with students 'at its heart' (p7, p14, p38)
3. HE as a building, with a 'new architecture' (p7, p38, p58)
4. HE as circuit-board – where incentives for excellent teaching are 'hard-wired' (p8)
5. HE as body of water – producing a 'pool' of labour (p8)
6. HE as family, with teaching 'a poor cousin' of academic research (p8, p20)
7. HE as a rainbow, with a 'spectrum of provision' (p56)
8. HE as secret garden – with a new 'single gateway for entry' (p7, p48, p58)
9. HE as tug-of-war, where the 'pull' of teaching is 'balanced' against the 'pull' of research (p12)
10. HE as fortress – where 'barriers to entry' (p14, p42, p47, p49, p50, p55, p63, p80, p81, p87) need to be removed and 'high quality providers' are 'locked out' (p49)
11. HE as theatre stage – where Government will 'place a spotlight' on teaching (p18)
12. HE as sports pitch, where the best place to play the game is on a 'level playing field' (p9, p14, p42, p47, p57, p60, p62, p66, p68)
13. HE as therapeutic massage – where a 'light touch' is the most desirable approach (p47, p57, p60, p61, p76)
14. HE as rigid bureaucracy, where 'incumbent providers' (p14, p43, p49), refuse to retire to make way for younger upstart 'providers'
15. HE as shopwindow, where 'transparency' is the ultimate goal (p10, p12, p14, p58, p61, p76),

In each case the metaphor is used to create imagery that supports the point in the text and so contributes to the persuasiveness of the discourse. The power of metaphor is perhaps indicated through the fact that, barring one exception, it is not used in description of anything else but the main subject, HE. The one exception is a metaphoric personification common in Governmental communications: of the

Government's finances as being equivalent to weekly cash held by a woman member of a household shopping thriftily for groceries – with the discussion of 'the public purse'. Whilst the metonym is nonsensical in a description of macro-economic state financial policy, it is a powerful one, often used to support arguments for constraint in Government spending.

A similar, though gender-neutral, personification is the equation of Government finances with real, though abstracted, people, through the concept of 'The Taxpayer'. The Green Paper often sets the interests of Students and 'Businesses' alongside those of 'The Taxpayer', creating images of three people sat together in a room arguing their case or constructs of a higher power deciding which is more deserving to receive a financial benefit – student, provider, or taxpayer. The notion that such categories are not mutually exclusive as people or as interests, is not contemplated, but it does reinforce a paradigm that is individualistic and transactional.

An alternative conceptualisation, in a more cooperative society, might avoid such individualistic imagery and focus on Government's role as maximising total wellbeing or happiness for example. It is interesting from a 'power of discourse' perspective that this Government conceptualisation of public spending being about the interests of individuals, does not extend to a genuine empowerment of them in control over Government spending. Governments of all political leanings have resisted calls for the hypothecation of taxation at a national level, preferring a rather more opaque view of where Government spending goes and holding control over its distribution with Ministers as opposed to citizens.

Both examples are themselves perhaps indicative of the enduring influence of the Treasury across the field of Government policy- evident at a number of points within the BIS discourse as noted in the next section on inter-discursivity, as well as over the habitus of governmental discourse more widely.

Inter-discursivity

CDA advises to look for the connections between different discourses and discourse dialectics. Some of these discursual connections, or chains, are explicit and deliberate on the part of the author: from the foreword of the document, the Minister makes it clear that the proposals put forward in the Green Paper are part of a longer-standing policy intent from the Conservative Party which it held whilst in coalition with the Liberal Democrats but was unable to put into practice because of differences of view in the coalition: the Minister refers to 'unfinished business'.

Other inter-discursive chains can be identified through examining the evolution of policy over time, and across policy fields across Government, and through awareness of critical incidents in recent HE policy and practice that would appear to have a bearing on, and provide a rationale for, current proposals.

For example, in the following passage, the paper describes the shortcomings of data collection in the old system and proposes later that Government should therefore be given powers to acquire it.

The availability of high-quality data and information underpins public policy development and research. Currently legal powers to require that data are to be released from various bodies, and to ensure it is comparable, are limited.' (p39)

This relates to an ongoing power struggle in the wider HE field, under the cover of a focus on teaching excellence and widening participation. Government signals, in the Green Paper, its willingness to acquire legislative powers to strengthen its position in relation to other actors. The focus of this attention is UCAS - an independent charitable organisation providing services brokering application and admission to UK HE providers. It is funded by university-subscription and user fees, with a Board of Trustees dominated by university vice chancellors.

Fulfilling a function often carried out by Government-controlled Non-Departmental Public Bodies, UCAS had resisted the release of data to Government for purposes other than those covered within its charitable aims (or to its critics 'for the purposes of pursuing the interests of the universities that are its main funder'). The Green Paper threatens to obtain legal powers to require UCAS to provide such data, without revealing this directly, with the discourse focusing on the value of a wider dataset for meritorious policy aims.

Inter-discursivity can also be identified in the form of discourse. Given that the majority of academic research takes place within universities, the authors of the Green Paper appear to regard the form of academic discourse, with the referencing through footnotes or endnotes of supporting evidence from reputable publications, as a form that will engender respect and support from the policy actors expected to respond to the Paper. This is most evident in the section that is focused on HE and research regulation (Part 4) and thus more likely to be responded to by those most concerned with academic research, where the density of academic references per page is significantly higher. It is argued that the academic discursual form lulls the readers into a sense that propositions in the main body of a paper will be supported by the sources they reference. The Green Paper adopts this academic form of writing.

A closer examination of the sources and referencing throughout the Green Paper shows, however, that whilst the form of academic writing and referencing is followed, this is followed stylistically and selectively, as opposed to reliably and consistently. In many areas assertive claims are made about facts or events and no evidence is presented, even where evidence exists and is widely known (and runs counter to the Government's argument); the sources referenced often do not necessarily support the arguments made; references are made to unreliable sources, such as blog posts or news articles reporting on a piece of research rather than the research itself; and in some cases references are to unpublished (and therefore unverifiable) internal documents in production. For example:

'Information about the quality of teaching is also vital to UK productivity. In an increasingly globalised world, the highest returns go to the individuals and economies with the highest skills. However, the absence of information about the quality of courses, subjects covered and skills gained makes it difficult for employers to identify and recruit graduates with the right level of skills and harder for providers to know how to develop and improve their courses. For example, the Association of Graduate Recruiters (2015) found that almost a quarter of employers had open vacancies

because they couldn't find the right skills in the most recent graduate cohort (14).'
(p19)

In this case, the paragraph asserts that 'the Association of Graduate Recruiters (2015) found that...' suggesting that there is a publication or report by the AGR published in 2015. The footnote (14) is a reference to another author - the National Centre for Universities and Business, from 2015. The reference is in fact to a blogpost on a webpage in 2014. The reference to the AGR in that article is a link to a Financial Times newspaper article in 2014 which does not make reference to an AGR claim of 25% of employers. The article does find that there were employers reporting skills shortages in 25% of roles, but for technicians.

'There are substantial gaps in the progression of white males from disadvantaged backgrounds to higher education. Only around 10% of white British men from the most disadvantaged backgrounds go into higher education; they are five times less likely to go into higher education than the most advantaged white men. Participation by this group is also significantly lower than participation by the most disadvantaged from BME backgrounds: the participation rates for men of black Caribbean heritage are over 20%; for men of Indian heritage, they are nearly 50%; and for men of Chinese heritage, they are over 60%.' (p37)

This data-heavy paragraph provides no source for its relative percentage claims of different ethnic groups. Paragraph 13 references 'Research by BIS' but without a reference.

In a second example below, two large reports are quoted, without page numbers:

'There has long been recognition that the higher education regulatory architecture has become outdated, and needs to evolve to reflect the significant changes that have been made over the last decade. In 2013 the Higher Education Commission called for a new regulatory framework and additional protections for students. 43. And more recently, in February 2015, UUK published their report Quality, equity, sustainability: the future of higher education regulation. 44. The UUK report calls for a new regulatory body to be established, which would incorporate the functions of HEFCE, but reflect the new landscape and with an additional student protection focus.'(p57)

They are cited as supportive of the Government's reforms, yet a reading of the reports themselves shows that they are not. The HE Commission report did not propose 'additional protections for students'. Although it did recommend a number of reforms similar to those adopted by Government, it was warning about the risks of liberating access to private providers rather than calling for greater liberalisation. It stated that 'We are concerned that there is a growing unregulated sector of higher education that may be offering insufficient provision to students. This has the potential to damage England's reputation as a leading provider of higher education.'(p17-18). It went on 'New market entrants are not facing the scrutiny they should, takeovers and complex corporate structures are being used to evade fundamental protections for students.' (p.19). Its remedy was to create a 'Council for Higher Education' with a rather different emphasis to that proposed by the Green Paper.

The referencing of 'higher powers'

One form of inter-discursivity not yet discussed relates to the creation of connections to other sources of power within a wider field. This form of discourse

analysis identifies those with power within a field and looks for connections from the policy proposals in question (in this case in the Green Paper) and those other sources of power. This may in some case be an inter-textual link, a use of common language, or a claim of alignment of the proposals in the sub-field (of HE policy) with the higher field (of Government policy).

In the Green Paper there are three examples of this practice designed to increase the discursive power of the policy arguments. Two of these reinforce this with the use of personification. In the first, the Green Paper makes reference to the Prime Minister. Rather than merely saying 'it is Government Policy that' the Green Paper makes explicit reference to the Prime Minister David Cameron (p36, para 3), and uses the same terms as used in a speech by the Prime Minister (p38, para 3). In the second, considerable, almost deferential, reference is made to a parallel review in progress, chaired by an individual with considerable social capital within elite research circles, Sir Paul Nurse.

The third reference relates to signals in the discourse to the influence of HM Treasury. Before publication, a policy of this kind will need to have obtained the support of Treasury. Treasury civil servants are usually most concerned with controlling the extent of Government spending and liabilities. There are explicit references within the Green Paper to Treasury concerns but also a noticeable difference in the discourse in some sections of the text where paragraphs may have been inserted at the insistence of Treasury, which is often concerned with mitigating the risk of government spending beyond planned budgets. For example:

'Ensuring that a provider is financially sustainable is an important safeguard for students and for public funding – but a balance needs to be struck between student protection and the three-year track record that may be delaying entry. One option would be to reduce the three-year track record to two years, but this would allow for a very limited view of sustainability over time, and would give considerably less confidence. This might be more acceptable if accompanied by some form of guarantee of student protection as a condition of designation, both financial and in terms of how students would complete their course.' (p51)

In relation to the financial sustainability of private providers, the proposals are far more cautious and less ideological than the preceding paragraphs of the document, without an assertive statement of the value of new providers entering the market quickly, as in other sections. It may be that in respect to financial liabilities, the influence of Treasury, concerned over the potential costs to Government for having to compensate or cover the recovery costs of failed private providers, tempered the discourse and the substance of the proposals as a condition of agreement of the policy. There are a number of such discursive signals of the influence of Treasury priorities throughout the document.

Inter-textuality

Inter-textual chains are also evident in the Green Paper. In some cases, these are manifest – documents referenced to add weight to the policy arguments or text quoted from such documents. For example

'There is evidence to suggest 'strong orientations towards research often reveal a weak emphasis on teaching, and vice versa'¹⁵. ' (p20)

This section references a text, 'Dimensions of Quality' (Gibbs, 2010), that was central to the key policy text of the previous coalition government, 'Students at the heart of the system' (BIS, 2011), the agenda that the Minister refers to as 'unfinished business' in the foreword to the Green Paper. An inter-textual connection reinforced later in the document (p38) with reference to structural reforms that will put 'student interests at its heart'.

In other instances, inter-textual connections are used to give the impression of continuity of argument within the Green Paper, between sections. For example, in this paragraph in the section on social mobility and widening participation, the text refers back to a previous section:

'Work to improve access and success should have close links with the TEF. We propose that the TEF will recognise the efforts that providers make to improve the access and experience of students from all backgrounds, and the importance of this to the overall student learning experience. The link between the TEF and access and success for disadvantaged groups is explored in detail in the section on the TEF and disadvantaged groups (Part A Chapter 1)' (p38)

The restatement of a claim made at an earlier stage in the Paper gives the impression of its stronger validity. The actual extent of this connection is arguably rather limited, though this paragraph would make the reader believe it was well established.

Extending the Fairclough three-dimensional model: new categories of policy discourse technologies

In addition to those categories provided in the Fairclough CDA typology, it is proposed that the following categories may add explanatory value.

i. Simplification

Effecting change in society is a complex activity. There are many variables, many actors where their behaviours can be difficult to forecast, and a number of forces that are constantly ebbing and flowing. Into this complex system of society Government seeks to use policy and its implementation in order to achieve political objectives. The process of presenting the reduction of complex choices to a small number of options I have described as 'simplification'. Two examples from the Green Paper are given below:

'TEF assessments should be based on criteria that are straightforward and robust and are easily understood'(p31)

'Our expectation is that effective metrics will be: • valid: the metric provides a useable measure of or proxy for teaching quality • robust: the metric is based on accurate data that has been subject to rigorous quality assurance • comprehensive: the metric provides wide coverage (except in the case of some additional metrics) that enables institutional and subject level comparisons • credible: the metric is established and has gained the confidence of the sector • current: the metric has been collected in the last 3 years.' (p33)

In the former instance the Paper proposes that the complex interaction of factors contributing to 'teaching excellence' can be made to be 'straightforward' and 'easily understood' through the policy that will define simple criteria.

In the latter example, the ‘simplification’ discourse technology is used to establish five principles for metrics and evidence. The presentation of a set of criteria such as these discourages the reader from looking behind the stated criteria at what principles may actually have been applied. By giving emphasis to some words, it de-emphasises other principles that may actually have been applied (such as the need to do no damage to existing elite universities).

Support for the recognition of ‘simplification’ as a discourse technology comes from the field of behavioural economics and the work of Kahneman and Tversky (Kahneman, 2011) (or see Shleifer (2012) for a review). Kahneman and Tversky demonstrate, through psychological experimentation that establish the importance of ‘heuristics’ in decision-making, and ‘Prospect Theory’ that showed, when presented with complex choices, people will often replace the complex choice with a simpler one, in other words they adopt a heuristic to help them answer a question.

Furthermore, they argue that the ‘framing’ of such choices by asking questions which are contextualised in particular ways, can influence the question asks. As Shleifer summarises (p1085) ‘...to make judgments we represent the problem automatically via the functioning of attention, perception, and memory, and our decisions are subsequently distorted by such representation.’ He goes on to note that Kahneman ‘recognizes the centrality of context in shaping mental representation of problems when he talks about the WYSIATI principle (what you see is all there is).’ (ibid., p1088).

The application of this principle can be demonstrated to good effect in policy discourse in the Green Paper as an example of ‘simplification’: extremely complex decisions about how to influence the behaviour of a number of different actors within higher education, are presented as simple choices between two options, where the reader is liable to give less consideration to other possible options, or to challenge less the certainties associated with each option presented. Whilst the application of behavioural psychology to CDA is beyond the scope of this thesis, the apparent alignment suggests further research to explore the ‘simplification’ technology in policy discourse may be a fruitful line of enquiry,

ii. Tangentiality

In conventional policy discourse, concepts or propositions are typically presented hierarchically. Broad concepts, principles or propositions are introduced at the start of a paragraph, in its first sentence. The following sentences might provide supporting evidence or rationale or break the broad principle down into policy aims or objectives, with minor elements of practical implementation or technical detail provided in bulleted lists or later sentences. The final sentence of the paragraph will often summarise the argument. Readers are aware of this construction and come to expect major themes or proposals to be introduced in this way. There is a ‘critical path’ to the argumentation signalling through discourse the main issues to be considered and those minor issues which might be of lesser significance. Second, it is a truism that Government cannot claim to have consulted on a proposal if that proposal was never articulated in written text.

There are instances in the Green Paper however where this convention is not followed and the main, important policy message or proposal are found 'hidden', written in the text but not to be found within the 'critical path'. It is argued that this phenomenon, of placing a significance policy issue in a position tangential to the critical path, which is described here as 'tangentiality', should be regarded as a discourse technology to be considered within the CDA typology. An example are provided below

'A provider with a limited evidence base, but which met "model 2" expectations around quality, student protection, information provision and financial stability, might still be able to secure DAPs, but potentially on a rolling, time limited basis, with regular monitoring. They may have some restrictions placed on them, for example not being able to validate degrees at other providers, continued restrictions on visa conditions for international students, or being restricted to certain subjects.' (p47)

The paragraph emphasises the restrictions on some providers with limited evidence of provision, and so is likely to be well received by those concerned about quality and standards. It hides an important, and first, reference to extension of powers for private providers, through the use of tangentiality. The sub-clause is giving evidence of those things that a provider with limited evidence *cannot* do. Through this device it is able to identify for the first time that private providers will have the power to validate degrees at other providers (creating a further mechanism for these providers to circumnavigate the 'threshold' requirements of the supposedly single system). It also states that there will be no restrictions on international visa conditions (the subject of considerable private provider fraud in the provision of level 5 HE qualifications in the preceding years).

In these instances, policy propositions with significant implications which are likely to be poorly received by the respondents to the consultation are positioned as sub-clauses or bullet points within paragraphs. Though proposals must feature in the text, tangentiality as a discourse technology serves to detract from the significance of a proposal, to see that it receives less attention and hence less criticism, decreasing the likelihood that it will be opposed by a significant proportion of the consultees, and thus more difficult to justify. Where a critical reader of a policy document comes across such tangentiality they should pause and question why a significant proposal is hidden in plain sight in this way and probe more carefully as to the implications of whatever that policy proposition is, drawing attention to it with other policy actors.

iii. Level-Shifting

Policy discourse typically functions at a number of different levels – from concepts and principles, through policy aims and objectives, to the operational procedures to be used in the implementation of a policy. It has been argued in this thesis that policy discourse can be viewed through the lens of actors' attempts to exert power and influence over others. As policymaking is therefore not a process of an evidence-based search for a course of action bringing greatest benefit to the greatest number, but the attempt of one person to exert their will over others, on occasion the policy arguments will be weak. Cases may be constructed to support a particular position for which there is only limited evidential or logical support.

The Green Paper illustrates how, in these circumstances, a shift in the 'level' of the policy discourse, for example from operationalisation to concepts or vice versa, can serve to add weight to the power of the discourse deployed. Where such transitions occur, it is argued that readers should be particularly critical and alert. For instance, in the paragraphs that follow a discussion of policy aims around 'level playing field' and 'clearer and faster trajectory', the document shifts into micro-level discussion of practical actions, in a section that is prefaced with the statement that Government may not get legislation passed, but will try and do some things anyway:

'6. Non-legislative proposals included in this section include: • alternative ways of obtaining assurances on quality and financial sustainability, without requiring new entrants to spend time building up a track record • conditions under which Government should grant multi-year specific course designations to APs • combining common elements of application processes, in order to simplify the framework for providers

7. The figure overleaf shows an illustrative example of how a new provider's experience could vary from the current position, on the left, to the new position, on the right. The key features of the new position would be: • Quicker access to student funding, and no cap on student numbers • Ability to apply earlier for degree awarding powers (DAPs), with a more flexible approach to track record • Shorter time period for DAPs assessment • Ability to secure university title (UT) much earlier, provided conditions are met' (p43)

iv. Temporality

Time is frequently used within policy discourse. As a discourse technology it is used not to pin-point precisely the timings of critical incidents or chronologies of events (although it may be used in this way) but as a way to add weight to or detract from the significance of a policy proposal.

"English higher education is supported by nine Government and sector owned bodies with a core role in the system architecture: BIS, SLC, HEFCE, OFFA, QAA, HEA, HESA, Office of the Independent Adjudicator (OIA) and UCAS. It dates from the early 1990s when direct grant made up almost all higher education teaching funding. The total cost of running these bodies (excluding the SLC) is over £60 million per year for higher education providers and over £40 million per year for taxpayers.' (p58)

Interesting here is the use of time to signal relevance or irrelevance. The term 'It dates from the early 1990s...' in itself is supposed to set up an argument that it requires change. The remainder of the sentence supports this: '...when direct grant made up almost all higher education teaching funding.' and is designed to signal that the bodies are an anachronism. It is the discursive form that is used to strengthen the argument here, as the substance of the point (that the bodies self-evidently need to be substantially changed) was vehemently contested by stakeholders.

Secondly, a consideration of the time that respondents have available to make their responses can be a valuable discourse technology in influencing the balance of consultation responses received. As time is not infinite, policy respondents will typically have a fixed time available within which to make their responses. They may need to seek the views of others, where they represent the views of a number of stakeholders. They will often have to work to a deadline for the close of the

consultation, after which date no responses will be considered, and are also likely to have to complete their responses amongst a number of tasks that they are responsible for.

Chronology in the document and the form for the responses can also influence this process – asking numbered questions nudges respondents to answer them in the order they are asked, and where, as in this case, responses are invited through an on-line form, this ordering is reinforced. There may also be a narrative logic to the ordering of the questions where some questions follow from others. Thus, other things being equal, those questions towards the beginning of a consultation document are likely to receive more time than those towards the end of it, something that could be tested empirically. Secondly, some questions are likely to require more time to answer satisfactorily than others. A question posed that requests evidence as justification, one that is a very open question, or where the text that preceded it had a wider variety of options or issues to discuss, is likely to take more time to answer. At the opposite extreme, a question that is not asked may succeed in seeing that respondents do not spend any time on it.

Thus, in the Green Paper, if the authors are able to occupy the time of policy respondents in considering and producing more detailed responses in some areas to which the Government is not really committed, it may mean that a less detailed response is made in other sections in which the Government is more significantly invested. This is arguably the case in the Green Paper. The document is 'front-loaded' with virtue signalling sections about removing disadvantage and promoting equality of opportunity as well as with a detailed discussion of a new, largely inconsequential, initiative, to compare the teaching contributions of different providers. Questions about these sections are open and follow a great deal of detail. Questions about the entry of new providers, the restrictions to the power of the regulator and the enhancement of those for the Secretary of State are briefer and follow more assertive statements about the appropriateness of the policy proposed. Compare for example these questions about the equality impact and widening access:

'What are your views on the potential equality impacts of the proposals, and other plans, that are set out in this consultation? b) Are there any equality impacts that we have not considered? If so, please provide any further relevant evidence.' (p16)

'Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds? Please give reasons for your answer. b) Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress? Please give reasons for your answer. c) What other groups or measures should the Government consider?

Question 13: a) What potential benefits for decision and policymaking in relation to improving access might arise from additional data being available? b) What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.' (p39)

With these ones at a later stage about the entry of private providers and powers of the ministers and regulator:

'Do you agree with the proposed single route into the higher education sector? Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.' (p61)

Do you agree with the proposed powers for OfS and the Secretary of State to manage risk? Please give reasons for your answer. b) What safeguards for providers should be considered to limit the use of such powers? (p65)

Thus, both the form of questioning and the positioning of it can serve to manipulate the result of the policy consultation. Respondents are of course able to make responses in whatever form they choose, yet most will respond to these nudges and so consideration of time should be considered a discourse technology in the policy actor's armoury.

v. Power discourse

It is argued that those aspects of a piece of policy discourse that are most important to the author (or their masters) can be identified through an appreciation of CDA discourse technologies and specifically through the concentration of those technologies within particular sentences or paragraphs. These paragraphs or sections are examples of what here is called 'power discourse'; so called because the high density of discourse technology techniques that the author deploys demonstrates an intent for that section to be very powerfully communicated. Seven examples are identified in the Green Paper. Two examples are provided below:

'1. Widening the range of high quality higher education providers stimulates competition and innovation, increases choice for students, and can help to deliver better value for money. Our aspiration is to remove all unnecessary barriers to entry into higher education, and move from parallel systems to a level playing field, with a clearer choice for students. We are exploring how to achieve this by creating a single route into higher education, through which all providers are equally able to select an operating model which works for them – both at entry, and once in the system.' (p42)

This is probably the most discourse technology-rich passage in the whole Green Paper. It is used at the first paragraph of the section setting out arguably the most radical HE policy proposals made in over twenty years.

'The existing regulatory framework does not provide a level playing field for new providers. Despite improvements, students do not have all the information they need in order to make an informed judgement as to which provider offers them the best quality, at the best price. The system also contains many elements that are unnecessary, duplicative, and burdensome, creating little real value, adding unnecessary costs, and holding providers back. The Government intends that in the new system all higher education providers – existing HEFCE funded and alternative providers, and new entrants – would be regulated on the same basis by the OfS. ' (p60)

This paragraph repeats previously introduced themes but the concentration of the arguments in one paragraph, combined with a number of discourse technologies makes this a piece of 'power discourse' and so warrants further attention. It relates to the new freedoms for alternative providers. There is the 'level playing field' metaphor, the repetition of 'does not' and 'do not' and the penultimate sentence is laden with impassioned wording: 'unnecessary, duplicative and burdensome', 'creating little value', adding unnecessary costs', 'holding providers back'. There is a

sotto voce call to an egalitarianism and an evangelism for the new world - one where 'all providers...would be regulated on the same basis.'. This is further supported by the paragraph that follows it which is similarly rich in discourse technologies:

'For all providers in the system, the OfS would operate a single, transparent regulatory framework. In the interest of students, the Government would require OfS to ensure all providers meet minimum baseline conditions on quality, information and student protection. In the interest of students and taxpayers as funders, the OfS would ensure providers with students accessing student support meet conditions on fee caps, access, financial sustainability, management and governance. This would include completing an access agreement if a provider wishes to charge eligible students fees above the basic amount (currently £6,000 for full time courses). In the interests of students, taxpayers and employers as beneficiaries of education, the OfS would operate the TEF to incentivise providers to put teaching quality on a par with research excellence. We would include an explicit duty for the OfS to respect academic freedom and institutional autonomy.' (p60)

The favoured words of 'single' and 'transparent' are repeated from earlier in the document, the frequent repetition of the phrase that reforms are in the interests of students, with the word student used seven times in six sentences. Favoured concepts of 'academic freedom' and 'institutional autonomy' are restated, and a commitment towards making teaching quality 'on a par' with research excellence.

It is recommended that where such concentrations of discourse technologies occur, the reader should look particularly closely and critically at the subject content, to ask 'why is this so important?', 'what might be the consequences of this policy?', 'what is not being said?', or 'what is the full range of other possibilities to the course of action proposed here?'

Lessons from applying and evolving Critical Discourse Analysis as a methodology for understanding the Green Paper

This chapter has applied Fairclough's CDA to analyse the Green Paper. Using the nine discourse elements of the Fairclough typology has revealed a number of features of the document in relation to meaning, intent, and stakeholder power. It has also shown how some of the norms of policy formulation in English public policy function in such a way as to steer the behaviour of policy actors and exert power over them. This section summarises the key lessons learned from applying CDA to the analysis of the Green Paper, sets out the new discourse technologies that it is proposed augment the Fairclough CDA typology, and provides an alternative 'CDA' reading of the Green Paper to contrast with the 'surface text' version summarised at the start of this chapter.

Key insights from the CDA analysis

There are three insights of particular note arising from the use of critical discourse analysis in the reading of the Green Paper. The first is that formal consultation exercises are forms of interactional control that exert power over policy actors in the field. The Green Paper asks particular questions of the respondents, directing them to those points, to be answered in response to the specific questions. Those questions apply different discourse technologies, either encouraging open and

fulsome responses or asserting positions and inviting more limited, closed responses.

The second is that the discourse reveals which proposals are more important to the Government policy authors than others. Argumentation, modality, inter-discursive and inter-textual reference, connectives, virtue-signalling, and words used and the meanings ascribed to them, have demonstrated that certain proposals in the Green Paper were of greater significance to Government. These were not always apparent from the surface text which served in many cases to divert audiences away from the significant and radical elements and garner support through the use of discourse familiar to the audience.

Thirdly, it is apparent from the discourse used by Government that the policy discourse is written for different audiences. More significantly it can be seen that the power of those different audiences has been anticipated and discourse used for different purposes to secure support from those stakeholder audiences, such as in contrasting the discourse around research with that of diversity and widening participation.

Evolving and augmenting the Fairclough Three-Dimensional Model
From the close analysis of the text (for the detailed analysis see appendix IV) five additional discursive elements were also identified as discourse technologies that do not appear within the CDA typology. It is provisionally argued that these may be a valuable enhancement to the Fairclough CDA method as applied to understanding and analysing policy discourse. The five are:

v. Simplification

The communication of any change as a simplification of previous complexity **and** the presentation of policy in very short, simple messages that provide heuristics for understanding policy and the complexities of the world.

ii. Tangentiality

There are two forms of tangentiality:

- a. the presentation of a significant policy proposal away from the 'critical path' of a narrative policy argument, such as by describing it in a single point as part of a bulleted list, in order to divert attention from it, whilst being able to say that consultation responses were invited on it.
- b. at the level of discourse structure and inter-textual relationships, the separation of policy proposals and decisions from other significant aspects of the policy development, such as the synthesis of stakeholder consultation responses or parallel consultations about 'technical' matters.

iii. Level-shifting

A shift in the 'level' of the policy discourse, for example from operationalisation to concepts or vice versa, used to add weight to the power of the discourse deployed or to divert from a weakness of policy argument.

iv. Temporality

Reference to time in policy discourse, either to justify a change by describing the previous situation as anachronistic, by projecting a view of the future that is optimistic and long-sighted, or by describing milestones of policy implementation in

order to build confidence that the policy proposer has a clear plan for how to enact the policy.

It is also used to show lineage to policy proposals and emphasise continuity, playing on default preferences for maintenance of the status quo amongst many in the consulted policy community.

v. Power discourse

The combination of a number of discourse technologies within a single passage, producing high density and powerful, influential writing and revealing aspects of policy that the writer is particularly concerned to see succeed, or, in opposition, those they wish to see removed.

Two forms of inter-discursivity in policy

In addition to these proposed augmentations to Fairclough's model, two uses of inter-discursivity (using discourse to exerting influence through the use of discursual forms prevalent in other fields) specific to policy discourse were identified: 'higher power' referencing and 'pseudo-academic' discourse.

i. 'Higher power' referencing

This is the practice of making connections, inter-textual or discursual, between the policy argument being put forward and other actors recognised as possessing forms of elite power in other fields. Bourdieu's concept of 'field hierarchies' is useful here to understand how connections are made to people or organisations, such as the prime minister of the UK, to add weight to the policy proposals put forward.

ii. 'Pseudo-academic' discourse

The second form of inter-discursivity is the use of the academic form of discourse where the sources referenced do not support the substance of the policy argument in the main text. Such is the expectation of policy professionals in the field that policy should be 'evidence-informed', the use of the discourse structure of academic writing has been used extensively in the form of argumentation used by the Government policy authors in the Green Paper. Such writing often follows the form: Statement or claim; Reference of evidence in support of the statement; Explanation of statement or claim; Implication and policy recommendation or conclusion.

In quality academic discourse, such as in peer-reviewed journals, the evidence referenced would be expected to support the statement or claim and be recognised as an authoritative or valid source (such as a paper in another peer-reviewed academic journal). Where sources reference policy actor opinion, polemic or utterances, as examples of views held by other stakeholders in support of a policy position, it would be expected that those views would be accurately represented. Peer-review of the main document would enable those representations to be critiqued and alternatives presented.

In the Green Paper, the discursual form of academic argument is used, arguably because it influences the reader, who both expects policy arguments to be supported by evidence and expects that evidence to align with the policy conclusion and recommendation. As the purposes of the policy-actor reader are rarely academic critique, it is proposed that few subject the references to the same

degree of scrutiny as would be found in academic peer review. This provides an opportunity for the Government policy actor to use a discourse technology to exert power, a practice titled here 'pseudo-academic discourse': the use of the discursive form of academic referencing, without the references supporting the argument put forward. This may also point to evidence being sought to justify a policy already decided as opposed to evidence informing the policy. In this instance, writers of policy discourse seek evidence to support a policy argument. Where they cannot find it they continue to use the discourse convention of referencing other sources in footnotes. It would seem less likely to occur if the evidence were first analysed and the policy recommendations emerged from that analysis. This 'pseudo-academic' form of inter-discursivity is so prevalent in the Green Paper as to warrant further examination in the analysis of the White Paper later in this thesis.

These new analytical categories add to the conceptual frame provided by Fairclough's typology of discourse technologies. The utility of these five augmentations and the use of inter-discursivity in the form of 'pseudo-academic' writing, will be applied and refined further within the other policy documents produced by stakeholder and Government policy actors. This evolving new conceptual framework will emerge from the analysis in chapters VI and VII. It will be brought together with other aspects of the Fairclough Three-Dimensional Model and Bourdieu's conceptual tools in the concluding chapter where the practical, methodological and theoretical insights from the full analysis and its significance for research into the policy process will be presented.

An alternative narrative of the Green Paper – a CDA reading
Finally, this section provides an alternative narrative of the Green Paper, informed by the applications of Fairclough's model. A CDA reading of the Green Paper reveals a rather different narrative to that arrived at from a 'surface' reading of it. There are of course many similarities. In many areas the messaging in the text is reinforced by the subtext of the discourse technologies employed. It is striking in particular, however, that those parts of the prose that are dense with discourse technologies identified through a CDA reading, (those areas of 'power discourse'), point to the aspects of policy proposals of most interest to the authors or their masters. This leads to a rather different, more critical, reading of the proposals, set out below. The detailed analysis supporting these conclusions is provided at appendix IV.

It is argued here that the main purpose of the Green Paper was to allow greater and irreversible entry to the HE sector by private profit-making providers of HE. Wherever there was a conflict between this and another espoused policy goal, this perspective was given priority.

That is not to say that the Green Paper does not give the impression of having wider, more inclusive, policy intentions. There is considerable 'ethos-signalling' in the Green Paper. This is characteristic of the policy discourse employed in a wider field of political discourse across Government, exemplified by the Prime Minister's speech at the Conservative Party Conference in June 2015 (Cameron, 2015) shortly after the election of the Conservative Government that introduced the Green Paper. In the Green Paper this appeared to suggest a commitment to empowered

citizens, equality of opportunity and the tackling of disadvantage, yet the substance of the proposals, behind the rhetoric, showed little action on this front and arguably a number of things that would run counter to it.

Whilst appearing to be central to the Green Paper's policy agenda, it is proposed that Government does not care about the Teaching Excellence Framework (the TEF) or its form. It was designed to divert the university policy actors from the significance of the economic damage being done to them. The evidence-base providing the rationale for its introduction is weak: the market information it proposes to make available to consumers is in a large part already present and in use by the producers of league tables for prospective student users and their advisors. The TEF section serves to distract the policy community away from the radical sections of the policy proposals in Part C of the document. Others have shown that the TEF represented the exercise of symbolic power (Tomlinson, Enders and Naidoo, 2018), (which is supported in the analysis of discourse in this chapter and the detailed discussion in appendix IV). It is argued here however, that whilst the TEF showed continuities with the neo-liberal advances of NPM and academic capitalism, it did not introduce any measures that significantly advanced it. The TEF was more a consolidation rather than a progression of measures introduced over the previous fifteen years. The 'measured market' that it represented was already long in existence and had already produced responses from university providers to position themselves in that market. The TEF used no data sources that were not already used by commercial publishers in the production of league tables for potential student customers, selling advertising and newspapers in the process. Universities were already closely attuned to National Study Survey, Graduate Outcomes, and continuation results and acted quickly to seek to improve their performance in relation to them. The one proposal to introduce a new measure in the TEF, that of value added, or 'learning gain' had started at HEFCE prior to the Green Paper and was never adopted.

It was precisely because the TEF and its methods were so familiar to the cadre of policy professionals responding to the Green Paper, that it served more to divert them from the real threat than to exert symbolic violence upon them. It brought the complicity that is a feature of symbolic violence, but no new economic violence on its own. It did not extend NPM and neo-liberalism merely consolidated it as the foundation for a different shift to HE privatisation. While replete with symbolism, and whilst embraced by the university policy actors (if not academic members of the universities they represented) there was no threat inherent in it to misrecognise. It was because it represented the status quo that it worked so successfully as a decoy for the HE privatisation introduced elsewhere in the paper.

If there is a focus for empowerment, it is of organised capital, as organisations to make profits from the public purse in providing HE. There is no intention to empower consumers or students, indeed attempts by those stakeholders to assert their views are threatened with greater controls. Priority at every stage is to facilitate greater access of private organisations to the HE sector so that profits can be made. Even a technical section on constitutional structures of 'HE corporations' is focused on removal of requirements for such organisations to serve the public interest, facilitating the use of public assets as security for private ventures. Powers

are also taken for the Secretary of State so that the workings of the market does not result in choices by customers that are counter to those interests of capital.

There are also perspectives that are furthered by these reforms which entrench (or at very least do not inhibit) the power of elites. The first of these relates to the interests of 'business' - sometimes referred to as 'employers' but never explicitly public or third-sector organisations. As well as including those views espoused by companies who employ graduates but do not have a stake in HE in the sense of 'chipping in' to the hypothecated costs of providing it, this 'common sense' interpretation of the functioning of society cements the protection and promotion of the interests of 'employers' within the HE system architecture regardless of their connection or otherwise to higher education.

The second elite group whose interests are not to be damaged in this change is research-intensive 'elite' universities. Efforts have been made to minimise the risks to those universities engaged in significant amounts of publicly funded research. These universities are also the institutions that members of Government have the strongest personal connections with. Fifty percent of the 2015 cabinet attended Oxford or Cambridge, 84% universities in the wider Russell Group (Sedghi, 2015). This care is taken throughout the document, yet the fourth part of the Green Paper in particular acts as a coda to this effect: proposing little of significance from a policy perspective, it serves to reinforce confidence amongst research intensive universities that they are not the target for the Green Paper reforms.

The elements of the Green paper of most importance to Government: furthering the interests of capital; facilitating the greater and faster access to higher education as a field for profit-making; enabling the transfer of public assets to the private, to become tradeable as loan collateral; are revealed through the lens of CDA. Powers of the Secretary of State are retained to ensure these interests are maintained and sustained and that the forces of collective power, as students or consumers, can be suppressed should the market system not function in a manner that furthers the interests of capital and profit. Once the virtue-signalling (inconsequential in practical policy-terms) is stripped back, the radical, paradigm-shifting nature of this Green Paper is revealed.

Higher education has long been one of the last bastions of the public sphere, from which relatively little public investment leaked, with New Public Management ensuring public funds were spent to best effect. The Green Paper proposals open the flood gates for the transfer of funds from the public to the private through profiteering from HE in England; the end of New Public Management; a new era of HE Privatisation.

The significance of HE privatization measures

It is important at this point to give further explanation as to the significance of the Green Paper proposals in relation to private providers. What was at stake for a new Government ideologically committed to extend private ownership into the provision of higher education? The first was that even before the 2015 Green Paper, private HE had experienced the benefits of access to the student loan book, through freedoms instituted by the Coalition Government, as noted in chapter IV. This resulted in an exponential increase in the amount of public funding flowing to

private providers for delivering HE. The Public Accounts Committee (PAC) report of 2015 on private providers showed the rampant expansion (Public_Accounts_Committee, 2015). Private take from fees rose from £50m to £675m between 2010-11 and 2013/14 over which the PAC expressed concern. When private-for-profit providers gained permission to access the student loan book, they used this to recruit significantly larger numbers of applicants with any level of entry qualifications. These people were typically enrolled on 2-year business and management HND qualifications awarded by Edexcel (itself a formerly charitable awarding body purchased by Pearson Global to generate profits) but examined by the provider itself. Pearson charged a fee (and so made profits) for each learner enrolled. Students enrolled in alternative providers between 201—11 and 2013-14 rose from 7000 to 53000. The PAC expressed doubt that all of those enrolled were students. It is not the purpose of this thesis to explore in detail the early developments, pre-Green Paper, of HE Privatisation. However, it was clear that this was an area where significant money could be made, even at the fixed fee of £6000.

Andrew McGettigan, writing presciently in 2013, summarises the situation well in his preface to 'The great university gamble: money, markets and the future of higher education' which he explained '...anticipates that any HE Bill which does materialise will be technical and presented as an attempt to rationalise arcane legislation. It will, however, be about new forms of privatisation, in particular, facilitating the entry of private equity into a sector that appears ripe for value extraction.' (McGettigan, 2013, p. iix)

Furthermore, McGettigan showed how, even before the 2016 White Paper, private equity was entering English Higher Education, recognising that access to Government-backed loans for student fees and maintenance mean risk free finance for private-for-profit HE. He charts the growth and byzantine structures of equity firms and their acquisitions, of the methods for transferring charitable organisations to private ones and the ways that charitable HE organisations could be incorporated within profit-making parent organisations and transfer significant funds to the private parent, through fees and payment for (ibid, p. ix). With the Green Paper proposing greater freedoms and higher fee levels, there was significant private demand and presumably pressure on Government to push forward with the proposals .

The Green Paper did indeed present a significant benefit to investors in private HE in England. Prior to the White Paper reforms, the maximum fee a private provider of HE could provide was £6000 per undergraduate student if the student was to borrow the amount in full from the Student Loan Company. The Green Paper proposals increased this to a potential maximum of £9250. There also existed a loophole (which Government chose not to close) whereby private providers could win sub-contracts from universities which the university could charge £9250 for. Whilst attractive, the private providers resented the controls on their freedoms (quality assurance applied by the universities who were accountable to the QAA for the quality of provision), and the fees those universities charged for these services (which was up to as much as 20% of the total fee). Remove the requirement to work through a university and all of the £9250 could come to the private provider

and without any organisation imposing its own effective quality assurance processes on the private provider, increasing by 74% the financial value to a private provider of every student they recruited, from £4800 to £9250. Furthermore, the UK Quality Assurance framework was very loose; dependent heavily on the values and collegiality of university providers that sought to maintain high quality provision, without the inspectorates of OFSTED that could come into schools or colleges at a few days' notice. For private investors considering the costs of operating in this newly created market, this also meant that there was no real necessity to invest in costly internal quality assurance, further increasing the attractiveness of English HE as a market within which to maximise returns on capital.

The established universities stood to gain far less from the Green Paper proposals. The only potential financial benefit in the Green Paper proposals was the chance to see the maximum fee they could charge maintain its value in real terms (something that in fact happened only one year between 2017 and 2023 with a single increase in 2017 of 2.78% from £9000 to £9250). The proposal was that universities would also only secure the full inflationary uplift if they attained the highest TEF score, a proposal also not taken forward.

The extent and significance of this watershed moment of the Green Paper can also be viewed from the perspective of what happened after the Green Paper proposals became law. As a recent study of HE private providers (Hunt and Boliver, 2023) shows, there has continued to be rapid expansion in the number of private providers and the volumes of people attending them, the vast majority of which were profit making.

This was in marked contrast to the era of NPM and academic capitalism, where despite adopting the methods of private sector organisations in the management and regulation of the English HE sector and its institutions and staff, the money still stayed and circulated within English HE. The Government's policy reforms enabled private organisations of any kind to invest in, and take their profits or dividends for shareholders from, English HE, to spend wherever they chose in the world, even minimising their tax liabilities in the UK through company registrations in other countries with lower corporation tax. An example of this is Global University Systems, an organisation founded by Russian entrepreneur Arkady Etingen, registered in the Netherlands, with operations in the Cayman Islands, that acquired a number of providers in the UK, including the University of Law (with university title and degree awarding powers). Public funding for HE was not an unlimited resource. As McGettigan (2013) demonstrated, whilst notionally funded through fees charged by providers to students, the costs of financing and administering the Government-backed student loan scheme meant Treasury still bore approximately 40% of the monies loaned, making it a significant draw on public finances. It was evident that at some stage there would be moves to restrict funding, by which time private providers would have both taken a significant amount of funding out of the English HE system and would also be well established as providers within it.

Conclusion

The Green Paper was therefore unlike previous reforms in that, as had occurred in the USA (Kelly 2016)), it produced an explosion in the ability of private investors to make profits when they obtained access to low risk-free Government backed loans and could charge. It was designed to usher in the new era of HE Privatisation. It succeeded in doing so and used discourse as part of its multi-pronged strategy for achieving the radical transformation first set out by David Willets, Minister for Higher Education in the Coalition Government of 2011-2015 that Jo Johnson, his successor in the Conservative Government regarded as 'unfinished business'.

Whilst it would be possible at this stage to discuss the interaction of Fairclough and Bourdieu, the purpose of the thesis is to understand action in the wider fields: interactions between actors within the HE policy field, and lessons for discourse and power within public policymaking more generally. The Green Paper has provided only one side of the HE policy discourse has been examined, that of Government, and so such an analysis would be premature. The next section examines responses from policy actors representing different parts of the HE system. Conclusions as to the insights that the combined conceptual framework of Bourdieu and Fairclough might bring will be considered after these further texts have been examined.

Chapter VI: The Stakeholder Responses

Introduction

This chapter analyses the way policy actors seek to influence government policy and the ways that they respond to the Government's own discourse and provocation in a Green Paper consultation. It draws out common themes across the respondents' discourse and highlights variations, accounting for the differences with reference to the organisational purposes, field logics, actor characteristics and conditions of production. The conclusion attempts to identify examples of influential policy discourse that might be expected to produce impact on the White Paper, to enable a comparison with the features that were actually changed in that final text.

A number of HE lobby organisations were selected, each representing different aspects of the established university sector. The paper draws on the written responses from five organisations: Universities UK (UUK), GuildHE, MillionPlus, University Alliance, and the Russell Group, which have been coded using the CDA coding frame, augmented by the additional conceptual categories developed as part of this thesis and detailed in chapter V.

Contrasts and Commonalities in HE Mission Groups and Representative Bodies – understanding the social contexts of discourse production

Fairclough's model requires that the social contexts of discourse production be understood to inform an understanding of the discourse itself. The discourse to be examined, responding to the Government Green Paper, is produced by organisations and written by individual or groups of actors. It is therefore worthwhile to gain an understanding of the histories and identities of those organisations .

The engagement of stakeholder representatives of universities and HE colleges has been a feature of the field of English HE policy development since the first meeting of universities in 1918 and the formation of the Standing Conference of Principals (SCOP – the forerunner to GuildHE) in 1967. University 'Mission Groups', so called as they supposedly existed to promote the differences of mission between different types of universities, became a feature in the 1990s. After the 1992 HE and FE Act enabled polytechnics to become universities, differentiation between the larger group of organisations bearing the name 'university' became rather more important to some universities and from the 1990s to the present these Mission Groups have coexisted with the two 'representative bodies' of Universities UK and GuildHE. The rationale for examining these organisations for the purpose of this study and the academic literature about them was reviewed in chapter III above. In short, this is because they both exist to influence Government policy and are

staffed by professional ‘policy actors’ who engage extensively in discourse in carrying out their roles.

The different stakeholder organisations can be seen to exhibit different views on HE policy, borne of their slightly different memberships, and reflecting and worsening the fragmentation of higher education that the representative bodies had been keen to avoid (Filippakou and Tapper, 2013), sustained by and sustaining the ‘fetish of competition’ that Naidoo argues had taken hold in the higher education field (Naidoo, 2018). Recent analysis of the characteristics of universities in the sector also demonstrated that the groups did share more in common with their fellow member institutions than with those from other groups, although the correlations were not particularly strong and some universities shared more in common with members of another group than the one they were in membership of (Barbato et al., 2023). (Filippakou and Tapper, 2015)

They also can be seen to occupy a place in a particular field, that of English HE policymaking, where members of the policy ‘community’ often share similar career backgrounds and indeed often move between different policy organisations, quangos, agencies and policy influencing roles in universities (Bagshaw and McVitty, 2019). This field itself is a sub-field within the wider one of Government policymaking, where a larger group of policy professionals occupy a number of different roles within Government, civil service, quangos, lobby organisations and think tanks, again often moving between those organisations as their careers develop. To a certain extent these individuals have an interest in a form of policy development that involves stakeholder dialogue – keeping them intellectually and financially sustained. Though not the subject of this thesis, it would be interesting to analyse the membership and career movements of actors within these fields, to assist in understanding the processes of policymaking.

The responses to the Green Paper from five organisations are analysed in this chapter. A short description of each organisation is provided below as context to the discourse analysis of the policy responses from the organisations. The interaction between their context and the discourse and text of the responses themselves are discussed in more detail in the body of this chapter below, particularly in the sections relating to power discourse, inter-stakeholder competition and discourse compliance.

Universities UK

The ‘Representative body’ of universities in the UK, with almost all UK universities in membership, UUK is by far the largest of the organisations. With a significant sized-staff, extensive range of member-led boards and large headquarters and conference centre in the heart of Bloomsbury in London, it has been a powerful and influential organisation. In the three decades preceding the Green Paper it has been frequently engaged by Government and its agents in the co-development and prosecution of HE policy. Income from member subscriptions, property letting and conference trading support a significant team of policy actors in the four nations of the UK and working internationally. (Universities-UK, 2023). With the creation of university Mission Groups that stressed the difference between universities and appointed teams of staff whose livelihoods were sustained by this view, it became

increasingly difficult for UUK to present lobbying positions with Government that were universal and impactful. UUK public policy submissions had to span a breadth of members intent on stressing their differences and thus were often rather bland in their recommendations.

GuildHE

Also recognised by Government as a 'representative body', GuildHE in 2016 had a small membership of smaller universities, specialist universities and university colleges, some private providers and Further Education Colleges with larger HE provisions. It had a small secretariat of seven staff, led by ex-civil servant (GuildHE, 2015). As more of GuildHE's University College members had secured full university title in the decade from 2015 and joined the UUK as a signal of their new exalted status, GuildHE's traditional membership fell. In response, to sustain itself, the organisation sought to attract new customers, leading it to recruit private providers as members. Whilst its members probably shared a smallness in organisational size in common, it was arguably the most diverse in its institutional type. Consequently, its policy responses and publications were often a peculiar balance of differing positions, compromises and non-contentious themes.

MillionPlus

MillionPlus is a self-styled HE 'think tank', raising awareness and influencing policy in the interests of 'modern universities', typically ex-polytechnics, which, it estimates, educate in excess of one million HE learners. Secretariat of 3 staff in 2015, led by ex-trade unionist (Vickers, 2017). Its members typically had most to lose by the introduction of HE privatisation. their traditional target student types, their tendency to need to 'recruit' as opposed to 'select' student applicants and the nature and subject-focus of their provision, meant that they were most likely to lose most students to newly empowered private providers. Its members were more likely to undertake applied research and in relatively small pockets with relatively limited research income and subject coverage.

The Russell Group

The Russell Group is a representative body of twenty-four research-intensive universities, typically with medical schools. It promoted itself as the group representing the UK's 'leading universities'. Its secretariat was led by an ex-think-tank analyst and senior civil servant from the Prime Minister's Strategy Unit (RussellGroup, 2017). The organisation regarded itself as representing a superior type of institution and form of higher education and appointed in its Director General an individual who embodied that attitude. Its concerns were principally in maintaining an autonomous status for its member institutions, in relation to the demands of Government, frequently arguing that the best way to maximise their wider impact was to minimise the expectations of and direction to them. The Group stressed the centrality and superiority of large research-intensive universities, arguing that excellence in research could not sustainably exist in pockets in other institutions. (Filippakou and Tapper, 2015)

University Alliance

The University Alliance is a mission group representing a mix of research-active universities typically created in the latter half of the twentieth century. It was led in

2016 by an ex-lawyer and BIS civil servant (Alliance, 2023). It sought to position itself as the group representing ‘innovative and entrepreneurial universities from across the UK to tackle the big issues facing universities, people and the economy.’ (Filippakou and Tapper, 2015, pp124-125) It was far more comfortable therefore with a close, pragmatic working relationship with Government and business in the pursuit of negotiated common ends. It pursued an approach to policy influence that emphasised its engagement with and effectiveness in response to Government priorities, in contrast to the rather more aloof and detached position of the Russell Group.

Stakeholder uses of discourse technologies: competence, compliance, and competition in discourse power within the English HE policy field

All responses analysed were produced by professional policy actors in organisations representing particular stakeholders from within the field of UK higher education. Whilst the responses exhibit a number of discursal similarities there are demonstrate some marked differences. The section below explores these discursal differences and similarities and seeks to explain the reasons for them through the use of three analytical lenses: the extent to which they demonstrate competence in the use of discourse technologies; the extent to which they follow interactional controls used in the Green Paper (compliance); and the extent to which their views exhibit competitiveness between stakeholders. In doing so it is also possible to reveal the impact of Government discourse in the Green Paper upon a selection of the audience it was intended for.

Competence

This thesis proposes that the purpose of policy consultation is and exercise in political power – that it is about one actor exerting influence over another. The analysis of effectiveness of discourse is judged against that measure. This section explores and compares the ‘discourse competence’ of the different responses and discusses the different discursal approaches, with reference to the Fairclough categories, testing whether this might be augmented by the further terms of ‘Time, Level, Power Discourse, Simplification and Tangentiality identified in this thesis through analysis of the Green Paper.

Modality

Fairclough argues that the producers of discourse will use the modality of their discourse in order to provide emphasis to (or to de-emphasise) their intentions and arguments. In some cases, auxiliary verbs will add force (such as ‘will’ or ‘must’) or may give the impression of being more tentative (using ‘may’ or ‘could’). Adverbs can similarly adjust the apparent confidence of the author in the veracity of their policy positions. All stakeholder respondents used these methods to give emphasis to their arguments or to temper the force of policy statements. In some cases for example, a rebuttal of Government’s proposals would be reinforced with assertive adverbials (e.g. ‘The UK government’s proposals to lower the bar for university title in England will have *profound* implications and repercussions...’) (MillionPlus, 2016, p16). In others, the modalities deflect from the bluntness of the opinion expressed

(as in 'We recommend strongly against OFS becoming a validation body. The office...would be *likely* to run into substantial conflicts...It would also require the office to take on a *fairly* burdensome role...') (UniversityAlliance, 2016, p15).

It may be that some stakeholders adopt a use of modality as part of a particular discourse approach designed to support particular strategies for exerting power. GuildHE and University Alliance, for instance, adopt styles of response that limit the force of their opposition to all aspects of the policy. The responses weigh the arguments for and against, highlighting things Government 'may wish' to consider or 'could occur if precautions are not taken'. This approach may be disarming and result in them being considered by the Government officials interpreting the responses as supportive and moderate. They may be invited in to contribute further as a result – allowing further influence. Contrast this with the Russell Group response which is confident in its opinions and in communicating what action Government should take, with the modal verbs reinforcing assertive statements.

It is interesting to note that across all stakeholders, respondents appear to modulate their responses within rather narrow parameters. For instance, MillionPlus is strongly opposed to the proposed reforms yet it does not communicate outrage, refute the foundations of the policy proposals or choose emotive verbs. It may be that as policy professionals the habitus of the field has a strong influence over their discourse and they do not regard more impassioned language as appropriate for a consultation response. Other measures, such as the interactional control of posing consultation questions focused on practicalities, may also have a bearing, but the experience of previous discursal exchanges around policy consultations will shape the expectations of how to engage. In the context of a representation of policymaking as a process where peers in a linear policy development process collaborate in seeking optimal solutions to policy questions in search of objectively verifiable maximum utility, it is not regarded as acceptable to express howls of anguish or anger at inequity. The discourse norms of the process serve to quell the anger of those regarded as working 'within the system' and they temper the emotion of their responses accordingly.

Politeness

There are a number of politeness strategies that warrant investigation. Avoidance is indicative of an area that may require further scrutiny. Respondents occasionally use avoidance of a question or discursal prompt where they believe the group they represent may perform poorly in comparison to other providers, such as with the University Alliance response to the question about disadvantage and Black and Minority Ethnic (BME) student participation, where it makes no comment about BME participation and focuses entirely on disadvantaged learners where it has evidence of higher University Alliance group participation. Respondents also use avoidance to conceal the partisan nature of their responses, with the implication that a view expressed is of wider sectoral significance, as GuildHE does in relation to its discussion of appropriate metrics (GuildHE, 2016, p13).

In some instances, however, interactional cues in the form of consultation questions are avoided but to no obvious advantage to the respondent. Where the substance of a policy consultation has been to propose a course of action or defines

a purpose of HE, avoidance on the part of the respondent (as with the MillionPlus response on whether TEF can better inform employer decision-making (MillionPlus, p4)), as a politeness stratagem, seems ineffective as it provides no counter to the proposal if it is disagreed with. If opposition from other respondents might be anticipated, and it were in the interests of the group, a positive support, either in the surface text or hidden discourse, would similarly seem sensible. Neither is communicated.

The University Alliance response combines a general approach of supportive politeness throughout to create an impression of the reasonableness of its suggestions such that when it does desire a course of action counter to that proposed by Government it is able to do so without appearing oppositional or confrontational – a more subtle approach than the Russell Group one. So, for example, in a paragraph that starts ‘We strongly support the need for targets to widen participation.’ It is able to propose a subtle change ‘However, institutions should set their own targets’, giving a reasoned argument as to why this should be.

One area where perhaps the Russell Group response might be regarded as less sophisticated in its use of discourse technologies is in relation to politeness strategies. The CDA model suggests that actors might use an absence of assertion as a technique to avoid engendering a countering response, sustaining the social order. The Russell Group is consistent in its confidence and assertiveness of tone, so does not use this technique. In the context of policy consultation, however, it may be that this discourse technology (to avoid assertion) might be far more appropriate for use by the Government author, seeking to avoid comment from consultees who respond, than for a lobby organisation seeking to communicate opposition or resistance. The Russell Group and Alliance responses differ in this regard – the former challenging directly, asserting directly opposing positions and usually engaging in policy discourse more suited to the meta-field of ‘UK Government policy’ than the sub-field of English HE. It does not appear to seek recognition or acceptance from a superior power (Government policy makers), rather adopts the tone of seeking to remind the authors of Government policy of a super-ordinate position in the public policy elite held by its members (individuals and institutions) in the Russell Group, and the due deference that should therefore be afforded its views and policy counterproposals.

In contrast, in the case of the Alliance, (and indeed to a comparable but lesser extent the UUK and GuildHE responses) politeness strategies are adopted and the response is less directly assertive, seeking to position the organisation in the mind of the Government policy authors as ‘on-side’ and helpful, to engender a greater willingness to listen and cooperate with that Group and engage in policy amendment discussions in a less guarded manner than that which might be undertaken with the Russell Group representatives, with their more explicit agenda of resistance and alternative proposals for action. In some cases, even where the response uses powerful words to describe concern (e.g., with the University Alliance referencing ‘reputational damage’ or providing a ‘severely limited’ view of sustainability (University Alliance, 2016, p16), the critique is couched in such polite terms as to render it almost unnoticeable – politeness *in extremis*. The relative merits of these different strategies will be investigated in the next section.

In some places the University Alliance response seems almost naïve to policy objectives (or is perhaps deliberately appearing to be so) as for example in para 26 where it highlights that institutions might go into ‘a spiral of decline’, though it is silent on there being a risk of ‘provider exit’. It seems to ignore ‘provider exit’ as a policy object, pretending it is not a key tenet of the paper. Government may receive the consultation response as sensible and pragmatic. If it believes it, it may well be a successful approach for influencing legislation. Other than giving examples of member institutions as evidence of good practice in implementation of Government’s desired approach, there is little ideational engagement, though the response is rich in practical suggestion on policy instruments and structures; of use to the civil servants who might implement the policy, as respondents are directed to provide, in the consultation question.

The University Alliance response also makes less use of personal pronouns than in the MillionPlus and Russell Group responses, giving an impression of a less impassioned argument but also assuming a less powerful and authoritative position. In contrast, a continued use of the pronoun ‘we’ can remind the reader of the identity and status of the organisation providing the feedback. The argument from University Alliance also flows less through the use of conjunctions between clauses and sentences, giving the impression of isolated points, even when grouped together. There is greater use of intransitive than transitive verbs, providing for clarity in its recommendations in relation to which organisations should do (or be responsible for which) action. It frequently uses cognitive verbs however, such as ‘we urge the Government’ or ‘its proposals must be considered in the context of...’ (University Alliance, 2016, p4) but with politeness that would be likely to stimulate engagement from the civil servant reader rather than engender opposition.

The discourse of the GuildHE response is another that perhaps reflects its own perception of the status of its members amongst providers of HE. Rather than making bullish claims for universal excellence, as the Russell Group response does, or even a statement that its members provide ‘some of the very best higher education in the country’ (which must arguably be true in at least some small aspect of provision particularly with the specialist institutions amongst its membership), its introductory paragraph is unhelpfully self-effacing: ‘All our members strive to deliver high quality HE and to meet the standards expected of UK HE providers’ (GuildHE, 2016, p1). Indeed, the statement can logically be read as meaning that some of its educational provision is below the threshold standards required for a UK degree, as if its members only ‘strive’ to achieve that standard it would suggest some of them do not succeed in reaching it.

Ethos

Effective discourse can function on the level of values and principles where appeals to concepts such as justice, fairness, and democracy can be deployed to reinforce practical argument. The Russell Group response, for example, asserts its values and what it believes is right or wrong, whereas the University Alliance response is more subtle.

The Alliance response approaches Government proposals with an analysis of implications for Government without challenge to the underlying values or

principles behind Government proposals. It implicitly accepts the legitimacy of Government to enact any policy, providing practical considerations rather than outright opposition. Other than in the areas led by the Green Paper – in teaching excellence and widening participation, it proposes little values-based engagement with the policy proposals. Ethos-based discourse, where it is present, is often found in passages of power discourse (see below) but seems to be used more sparingly elsewhere by respondents.

Connectives and Argumentation

Connectives (such as ‘therefore’, ‘thus’, ‘secondly’, or ‘consequently’) are frequently used to reinforce the substantive points of an argument as one might expect. For example: ‘There are already numerous ways that ...We would therefore like to be reassured that...We are concerned that ...’ (RussellGroup, 2016, p2); or ‘University Alliance believes that...Equipping students with industry, professional and entrepreneurial skills... is an important part of this. Excellent teaching... is therefore at the heart of what we do. We therefore welcome the Government’s focus on...We also see value in...’ (UniversityAlliance, 2016, p1) They are also used to give the appearance of coherence in the absence of strong, logical connection between points used in the course of an argument. For example, one respondent calls for: a. consistency in the quality standards applied and the levels of accountability between providers, then b. for using benchmarked data to reflect the institutional diversity of the sector, then concludes with calls for c. a heterogenous consideration of individual contexts (MillionPlus, 2016, p5). The connectives are used as a discourse technology to give the impression of cumulative points building a consistent argument, or a strong *logos*, when it can be seen the different points are contradictory: they call both for consistent treatment of providers as well as differentiated treatment based on special institutional circumstance. The connectives give the impression of argumentative coherence, allowing the writer to advocate two contradictory positions, that are each in the interests of its members (the former seeking to establish high barriers to entry to exclude new entrants to the sector, the latter to then bolster its competitive position vis-a-vis existing university providers who, on consistent absolute (as opposed to relative) performance measures, MillionPlus member institutions may perform less well against.

The choice and use of pronouns can also be used in an argument to signal alliances or reinforce other discourse technologies such as the appeal to normative themes. The GuildHE response, for example, is interesting in its use of the collective personal pronoun ‘we’ to align itself with Government and describe situations or views that are taken as being self-evidently shared between GuildHE members and Government. (GuildHE, 2016, p5) This contrasts with the use of ‘we’ by other respondents where it is used to signal the distinctiveness and ownership of views of the organisation in question, without suggestion of an assumed commonality of view with Government. This discursal technique may be effective for GuildHE whose response frequently appears to empathise with the challenges faced by Government, often summarising arguments for and against rather than expressing a definite view. This could be a function of the heterogeneity of the GuildHE

membership informing its response, but also of the experience and affinity of its CEO, Gordon McKenzie, who was a senior civil servant prior to joining GuildHE.

It is worth considering if the conscious deployment of connectives would have helped policy respondents with the marshalling of points in their arguments, in addition to serving to give the *impression* of logical argumentation and a reinforcement of the *logos* of their argument. The prompts of the connectives might assist them with their own critical reflection as to whether the points of their argument genuinely support a convincing narrative. It may equally be the case, however, that the power of the norms of policy discourse are such that the actors know that, stylistically, policy discourse should have connections between the points in an argument, that they can identify the presence of connectives and are able to use them, yet do not make the leap to consider the need to strengthen the *logos* of their argument. It may be worth probing this point further with policy actors in further research.

Transitivity, Theme and Nominalisation

A number of stakeholders adopt the technique of assuming certain proposals as being 'common-sense', requiring no justification or evidencing. This is often the case at the level of principles (such as 'The Green Paper recognises the important role universities play in supporting social mobility and it is right that they should be encouraged to support access and success for disadvantaged groups, thereby giving the widest possible range of people a stake in the UK's economic success.' (UniversityAlliance, 2016, p11)) which can serve to support lower-order argument elsewhere in a response. The Russell Group response uses it frequently, usually to assume that there should be no further demands or limitations on its member universities (for example 'It would be a concern if the proposals...have a detrimental impact on institutional autonomy...'; 'We all share a common aim...so it is important institutions should be able to determine their own priorities and focus resources appropriately...'; or 'Given that a core focus of the Green Paper is on teaching excellence and ensuring quality in high education, it is unfortunate these fundamental links between research and teaching are not recognised more strongly.' (RussellGroup, 2016, p1, p3, p16)) and it is present in the responses from UUK and from MillionPlus and GuildHE.

It is used in one place by the University Alliance and stands out as being different from its usual discourse. The University Alliance response notes that 'The HE system is based on student (not employer) choice.' And asserts that 'In a liberal democracy it is unlikely we would want to change that.' (University Alliance, 2016, p5). This is an uncharacteristically philosophical point from University Alliance, deviating from the usual University Alliance approach of polite pragmatic suggestion. It is followed by the usual practical proposals. The unusual nature of this intervention, (its lexical incoherence, to use the Fairclough typology) may illustrate an edit or addition to the discourse from a second author.

Many respondents adopt approaches they regard as unassailable common sense truths, mostly associated with the NPM arrangements of the relationship between the State and higher education. The Russell Group response does not feel it necessary to explain why a 'buffer body' (that arguably subverts the will of

democratically-elected ministers) is an obvious good (RussellGroup, 2016, p17). Similarly, the University Alliance response explains in its rationale for a particular funding option, that an option is less desirable because it 'may diminish the important separation of institutional funding decisions from central government (University Alliance, 2016, p17). It is not clear that these are discourse technologies deliberately adopted or the effects of field logics for policy actors whose whole careers have been spent working with NPM. MillionPlus at least does attempt to lay out the benefits of retaining features of the HE system with an NDPB that acts as a 'buffer body', although it can be seen that it does feel the need to use discursive connectives to justify something that (the passion of its defence indicates-) is regarded by the author as a self-evident truth (MillionPlus, 2016, p17).

Word meaning

The deliberate assertion of a particular meaning of a key word is a feature of a number of some of the most powerful pieces of discourse from stakeholders and is a good indicator of strength of feeling and the desire to influence. For example, the University Alliance uses it to signal the strength of its opposition to students' union accountability reforms by defining the issue as one 'of institutional autonomy' (University Alliance, 2016, p18), in this case combining it with a legal, governance and a conceptual level shift (characterising it as a matter of existing statute, for empowered governing bodies to decide upon in order to support democratic development). In another, the Russell Group uses the discourse of the Green Paper but re-frames it, suggesting its alignment with what the Russell Group already does, re-defining 'excellence' as 'what the Russell Group currently does' ('Putting students at the heart of the HE system is an important focus for the Green Paper and this fits with our own commitment. Excellent teaching typically builds on and is intimately linked with excellent research and this is central to the outstanding student experience Russell Group universities deliver.') (RussellGroup, 2016, p1). In contrast, in the battle over the meaning of 'excellence' in research, GuildHE argues for 'the principle that excellent research will continue to be funded wherever it is identified' and that it should 'include a stronger emphasis on the value of translational research...' (GuildHE, 2016, p25). GuildHE institutions did not have large-scale research activities, with only pockets of excellence, often associated with greater activity in translating the value of that research for application with businesses and charities. The dominant view of the time was that held by the research-intensive Russell Group institutions, that research excellence was most likely to be found, fostered and sustained, in universities with a volume and 'critical mass' of research activity.

MillionPlus takes a different approach with word meaning. It engages in the Government's notion of taking a 'risk-based approach to eligibility for degree awarding powers and university title' which the Green Paper linked to lowering barriers to 'new providers' entering the market and to creating a 'level playing field' for all 'HE providers'. MillionPlus makes the argument that institutions with a 'short-track record' in delivering HE should be defined as 'risky institutions' that 'would undermine the international reputation of UK universities' (MillionPlus, 2016, p14) and defines universities by scale and longevity. It contrast existing, established, 'universities' (of high standing, demonstrating competitiveness and

flexible response to demands of students and employers), with the 'new entrants' that are shown to 'ha[ve] misappropriated funds' and were liable to produce education of a lower quality, were they permitted to do so through a new regime based on a 'reduction in standards'.

Wording

Wording choice provides a different angle on policy respondent competence: respondents often seek to portray their responses as being supportive of a policy at a sector level and to conceal their particular sectional interest. To achieve the latter, they do not state that 'approach X would be in the interests of our members and so we advocate it' but rather use words synonymous with the characteristics or approach of those institutions. This can be seen in the case of the Russell Group, where, in the discussion of research excellence, talks of the importance of 'critical mass' and 'research concentration'; features at system level requiring large institutions with significant research operations, that are characteristic of their own member institutions. Similarly with the Alliance response, where in the discussion of the recognition of levels of teaching excellence above a baseline, it argues for recognition of 'a breath of excellence across a range of different factors' (Alliance, 2016, p2) where such 'breadth' and 'range of factors' are more likely to be present in universities than in specialist private training providers. For the MillionPlus response, there is an extensive critique of 'league tables' which it regards as inevitably being fuelled by the TEF metrics, where its members typically perform less well than other institutions in performance against a number of the often used (and anticipated) metrics of teaching, arguing for greater recognition of less tangible 'learning environment' factors.

The use of emotive wording adds power to arguments put forward by many respondents and is often the main tool used by actors in efforts to create power discourse. For example, MillionPlus's response states that 'It would not be in the student interest for newer, private or for-profit providers to be able to *escape* scrutiny'; that '...there should be no link with fees *at all*. *Arbitrary* price setting...is more likely to *stifle* innovation...The link with...fees will signal *misleading perceptions* of quality...' and that 'UK university title is not a brand that should be *'sold on the cheap'*' (MillionPlus, 2016, p6, p9, p13).

In terms of wording choice as an indicator of yielding to Governmental discursive influence, the Russell Group rejects the use of Governmental terms and uses its own 'lower-performing institutions' for example. It does not talk about universities as providers, pointedly using University and providers separately. Similarly, the UUK response, whilst not explicitly referring to new provider providers, rejects Government use of 'challenger institutions' with cautioning that there is a need 'to protect students against the risk of studying at poor quality, transient or negligent providers...' recommending an approach that, whilst not directly adversarial towards Government proposals to 'lower the barriers to entry', advocates 'consistent and robust requirements for entry into the sector', choosing alternative wording to emphasise a different policy proposal (Universities-UK, 2016, p1). MillionPlus also rejects Government's use of 'incumbent providers' to speak of 'established institutions' and 'mature universities'. (MillionPlus, 2016, p16). Often

however, Government's usage of different terms successfully diverts respondents, eliciting stakeholder responses that move, mid-response, between discussion of universities, of alternative providers and providers of all kinds, serving to weaken their discursal arguments.

Metaphor

While the Government's discourse in the Green Paper uses metaphor throughout to seek to create a different vision of higher education and the relationships within it, policy respondents hardly use it at all. GuildHE talks of the danger of 'an industry' being created around responding to the TEF (GuildHE, 2016, p4); that universities have done the 'heavy-lifting' on fair access (p13); and that the use of impact as a performance measure for research having 'shone a light' on the wide benefits of research in its member institutions (p25). These are, however, examples of commonly used, almost cliched, metaphors, and do not conjure up grand new or existing visions of the HE sector. MillionPlus goes a little further with the intimation that the Minister is behaving like a dubious barrow-boy market-trader, in its warning that 'UK university title is not a brand that should be sold 'on the cheap' (MillionPlus. 2016, p13) and that Government is attempting to 'lower the entry bar' for new providers (p21), yet even these do not create particularly powerful imagery. University Alliance is similarly limited in its imagery: it talks of the 'broad sweep' of policy, calls for some elements to be 'hard-wired' and notes that some students are 'rooted' in their localities (University Alliance, 2016). The Russell Group is perhaps the most extensive user of more powerful metaphor: it Talks of 'red tape', an 'embryonic system' not mature enough to be trusted, the TEF as a 'blunt instrument', the Green Paper and other reforms as 'herald[ing] another substantial period of disruption', and a particular (welcome) funding initiative as a 'stream' (Russell Group, 2016).

In aggregate though, the creative use of metaphor to paint pictures of the world either past, present or future, represents a significantly under-used discourse technology amongst stakeholders. The norms of the field of policy response perhaps militate against such usage, particularly given the interactional control exerted through the more factual posing of questions. The asymmetry with Government's approach left an important aspect of discourse power largely unexplored and arguably represents a missed opportunity for all respondents.

Additions to the model: Temporality, Level, Power Discourse, Continuity, Simplification and Tangentiality

This this proposes that there are a number of other discourse features that might reasonably be identified as 'technologies' to exert power and could be considered as an augmentation to Fairclough's model. Identified in the Green Paper, they are tested here in the responses from stakeholders, to varied effect.

Temporality

The different stakeholder actors deployed arguments using 'temporality', as Government writers did within the Green Paper itself, to communicate their views. The Russell Group response, arguably the most technically competent discourse response, plays with it extensively, with three sub-categories identified. Type 1- the

historical precedent; type 2 - the long-term perspective; and type 3 - the slow pace or incrementalism in change or implementation. In the first it emphasises the pre-existence of the policy outcome sought by Government, that of 'excellence', variously noting the 'huge amount...devoted to improving the student experience...over the last decade'. It stresses how its members were 'already' committed to Government's new policy objectives and that there were 'already many mechanisms in place...', with 'considerable progress to date'. In the second case, it argues for a long-term view, with an almost common-sense assumption that this is best, stressing 'the future' the importance of current arrangements 'continuing', that policy should 'still...', that it should provide 'a stable-base' over 'long-periods' and even that legislation should be passed to enshrine 'in perpetuity' an aspect of policy it is supportive of. Finally, with type 3 it advocates slow incremental change, 'evolution', that there should be 'staging' in policy that should be progressed only through a process that consensus over change should 'emerge', requiring that Government then 'consults' and that only then should it implement. The cautious approach to change extends to lengthening the time horizon for change, noting that 'Whilst there is scope to improve...in the future.' That is not an argument for change now (RussellGroup, 2016, pp1, 1, 2, 3, 6, 7, 16, 17, 18, 19, 20, 22, 23, 24).

MillionPlus makes similar use of the concept of time. In the 'type 3' sense, in areas of policy it opposes it, it argues that 'time will be required', that 'the current timescales are too short', and that 'a far longer timetable than the government currently proposes' for implementation is required. In a type 2 sense it proposes that consideration needs to be made of the impact 'over time' of proposals and emphasising that the intended effects of policy 'will not happen for many years (possibly 20).' And in a type 1 sense, that '...the sector has for many years had shared approaches to data collection and analysis...'. (MillionPlus, 2016, pp 2-4, 7-13).

Examples of all three types of use of temporality were also found in the GuildHE, UUK and University Alliance responses. It would have been possible for respondents to make their arguments 'in the moment', engaging only with the immediate presenting policy proposals. Temporal perspectives of the different policy actors added weight to the arguments presented and are arguably significant as a discourse technology.

Power Discourse

The respondents differ in their use of 'power discourse': the concentration of discourse technologies in particular paragraphs that when used arguably signifies a matter of particular importance to the author. All stakeholders use it in their responses and it does appear as a good indicator of when a writer may be seeking to exert particular influence.

The organisation 'MillionPlus' describes itself as a 'University think tank' in its submission (MillionPlus, 2016, p2) as opposed to a membership organisation or mission group, although it exhibits the characteristics of a mission group and was formed (in 1994) as the Coalition of Modern Universities, changing its name to the Campaign for Modern Universities (in 1997) before re-branding as 'MillionPlus'. Its

perspectives are informed in the main by the views of the universities that fund it, so called 'modern universities': typically, former polytechnics (educating in excess of one million learners in total), with significant student numbers from under-represented groups, and lower mean academic entry requirements relative to the university members of other mission groups in the sector.

As a think tank it might be expected that it engages at the level of principles, values and ideation. Curiously, and in contrast to the Russell Group response, the MillionPlus response displays less of these features and less discursual confidence. It adopts the frame provided by Government that shapes its response, it answers all questions, and appears to give weight to the questions according to the complexity of the answer sought rather than by the importance of the issue to the organisation responding.

The University Alliance response is different again and is rather technocratic, dealing with the way that policies could be implemented, as requested in the consultation, rather than challenging the notion of the policy itself. It accepts the authority of Government to make such policy, prepared to engage with debate over how a policy might be implemented, however undesirable that policy might be. Interestingly in its response, the closest it comes to 'power discourse' it reserves not for those elements that are in its members interests but on points of administrative principle, where it expresses 'concern' over the relative balance of metric and qualitative judgements in arriving at TEF judgements, asserts that enabling student choice is a matter that should be fundamental to HE in any liberal democracy, and is most expressive in discussing the appropriate powers for the principal NDPB and resistance to students' union accountability reforms. Arguably this indicates an author more connected with the habitus of civil service and HE public policymaking, potentially with a students' union background early in their career, than the interests of its members – an area where actor agency and the structuring effects of the field would appear out of alignment.

Continuity

It was argued following the analysis of the Green Paper that the presentation of ideas or proposals as representing a continuity from the present or past, regardless of the extent to which they might represent a change, should be regarded as a discourse technology. This was seen in the stakeholder responses. Stakeholders frequently argued that the current or past policy environments were superior to that proposed by Government. For example, the Russell Group makes considerable use of continuity-related arguments that emphasise the old system of HE regulation, HEFCE, the dual funding of research, and significant institutional autonomy as being in part responsible for enabling the international standing of UK universities (in the Russell Group) as world leaders. While it could be argued this was an objective weighing of the merits of the new proposals against the prior situation, the tone was often that the prevailing approach was the natural order of things and that to change it would require a stronger justification than to maintain it.

This presentation of the present as 'common sense' is interesting. Given that, at any particular point in time, there are examples elsewhere in the world of countries

with HE systems organised in very different ways, there is no logical reason why the status quo in England represents a better way of organising HE than any other. The phenomenon should be investigated further but its use in policy discourse here suggests that there may be a ‘continuity bias’ in policy development thinking which can be exploited in both policy proposals and in opposition to them.

Simplification & Tangentiality

Identified as potential new discourse technologies to augment Fairclough’s model in its application to policy development, these techniques do not feature in the responses of any of the policy actor responses that have been analysed. There could be a number of explanations for this:

- a. They are not generally applicable discourse technologies that could be used to influence others
- b. They are generally applicable discourse technologies but are not deployed by the respondents examined
- c. They are discourse technologies but are most effective in use by actors proposing policy changes and less so by those responding to those proposals

As the responses studied did not use these techniques, it would require further study of other policy exchanges before they might be proposed as ‘generally applicable’. That is not to say that all of the technologies identified by Fairclough are to be found in all instances of discourse, but to meet a threshold test for consideration they must be seen to be in general use in the instances studied. If, once observed elsewhere, they met such a threshold test, it might then be considered as to whether their omission was due to actor agency or lack of competence. They are not generally used in the instances studied, so this question cannot be answered.

The third explanation opens up a more interesting prospect for theoretical development – that CDA discourse technologies in policy discourse are situationally-specific. This might both lead to clearer guidance for policy actors on when to use which technology to best effect but also to inform more granular analytical techniques when looking for discourse technologies as markers of attempts to exert power. Indeed, much of the literature of CDA talks of revealing the use of discourse technologies to sustain elites and existing social order, to exert state power and subjugate other stakeholders. That such techniques may not be as effective in the resistance of that power could be regarded as consistent with the body of the CDA literature.

In the particular instances studied, the following possible explanation is proposed: that certain techniques are indeed more suitable for the Government proposer of a policy change than the responder. In the context of a formal policy consultation, Government seeks to secure positive approval from stakeholders for proposed policy change. ‘Simplification’, it is proposed, helps persuade respondents that making policy change, and implementing, it will be easy. Presenting the complexities of acting on a social system with many actors as straightforward helps gain support for it to a greater extent than a response that detailed complexities and the challenges that would be faced in dealing with them. One of the roles of the respondent in such an exercise is to highlight such complexities in support of a

case for why a policy change is inappropriate, or to highlight complexities and the ease of solutions in dealing with them if they are in support. Indeed, the form of consultation questions, (an interactional control), nudges respondents to make such contributions. It is reasonable therefore to expect that respondents would be less likely to deploy 'simplification' as a discourse technology in this situation.

It is not completely implausible that this technique might be used, however. Indeed, it could be imagined in an assertive, oppositional response dealing with concepts and principles, such as that from the Russell Group, that 'simplification' could be applied with some power. It could be used in re-framing the policy challenge and proposing some simple principles for guiding Government and actor behaviour for instance, which might contrast with the muddled complexity of Green Paper proposals. Yet it is a matter of fact that such approaches were not deployed in the instances studied.

The proposed technology of 'tangentiality' is similarly not to be found in respondent discourse. Tangentiality was identified as a discursive technique deployed by the Government proposer in which a point of policy significance is mentioned in sub-clauses tangential to the main argument, in order to minimise countering responses (much like a politeness stratagem). This is of use to Government as it can claim to have published proposals, sought feedback on them and received no negative feedback. It is unclear how the use of 'tangentiality' might be of use to the policy actors making a response, however. There is little advantage to the respondent of having a substantive point not noticed by Government: it would have no influence over policy this way. It is perhaps unsurprising therefore that there is no use of it identified in the responses studied.

This question of situational appropriateness of discourse technologies will be revisited in the concluding chapter to this thesis.

Level

The technique of shifting levels was used in Government discourse to create alternative justifications for policy with relatively weak rationale. For respondents, shifting levels from that referenced in consultation questions to 'higher' levels is a technique frequently observed in discourse used by all respondents. This suggests a hierarchy of levels, as Bourdieu recognises, for sub- and super-ordinate fields. Level-shifts were used in a number of ways.

The first is with reference from operational matters to principles and concepts; second, from technocratic rationale to those referencing the discourse of individuals with greater academic, ideational or thought leadership power (such as to those individuals conducting sector reviews like Lord Stern or Sir Paul Nurse) or political power (referencing ministers, Treasury and the Prime Minister). For example MillionPlus calls for investment in supporting students from disadvantaged backgrounds 'to help meet the Prime Minister's commitments in this area.' (MillionPlus, 2016, p12).

Thirdly, it shifts from matters of significance to the sub-field of HE policy in England, to broader fields. In one example this is done spatially: referencing UK-wide or international considerations. Here the Russell Group provides an example where it refers a number of times to 'international excellence' and 'global reputation' that is

at risk from the reforms proposed by Government. Other types of shift from the sub-field were also observed: both conceptually (referencing significance to society or democracy) and governmentally (from concerns of higher education to wider government agendas of social change, local economic development, or business productivity and innovation).

Interestingly, level-shifting also occurred in instances identified as 'power discourse', suggesting authors of policy discourse use it as a technique in areas where matters are of greatest significance. For instance University Alliance, in 'power discourse' focused at defending students unions, makes a level shift to raise statutory legal questions, questions of governance, and of democracy and university institutional autonomy (UniversityAlliance, 2016, p18). Similarly, the Russell Group response in commenting about the Teaching Excellence Framework shifts to the field of economic policy and cross-Governmental agenda ('...the TEF...seems at odds with the Government's desire for less red tape elsewhere in the economy.') (RussellGroup, 2016, p7).

Reflections on Policy Actor Competence

The section above demonstrates the ways that policy actors use discourse technologies identified within the Fairclough CDA methodology, which they all do to a greater or lesser extent. There are examples with many of the respondents studied where a discursual form is either used or not used in a manner that would appear to best serve the interests of institutions it represents. The framework for analysis seeks to explain discourse in use through reference either to: i. the structuring logics of the field; ii. the misdirection of discourse technologies used by Government discourse producers; or iii. to the agency of the policy actor.

The analysis in this section leads to the identification of a fourth potential cause: variability in policy actor competence in the use of discourse technologies. Stakeholder policy actors are required to consider policy alternatives, contexts and implications for their members. They must do so in the face of power discourse and misdirection used by Government discourse producers. They also need to consider both the questions explicitly asked of them as respondents (the inter-actional control of the 'Consultation Exercise') and to imagine the underlying interests of their own members within the future, hypothetical policy scenario that might exist should Government policy proposals be enacted. This is a complex task. Furthermore, the interests of the member institutions the stakeholder policy actor is employed to represent, may not be consistent. The actor is also likely to be subject to a range of other stakeholders, each of whom will seek to influence their views, text, tone and content.

It must be borne in mind that the explanation for a policy actor position may well be that they simply missed an opportunity to best represent the interests of their members due to factors un-associated with the policy consultation itself that might influence their performance on a given day. It is therefore sensible to be cautious, when seeking to explain policy discourse with reference to theoretical frames, power dialectics and actor agency, and recognise that when power is exercised through the words of individual human beings, there may well be micro-level factors that influence their actions.

For professional policy actors who specialise in influencing others through the written word, a high level of capability in discourse is however to be assumed; indeed, this section has explored the extent to which they deploy higher order discourse technologies in their writing. It is equally possible that policy actors in Mission Groups, who will perform a range of tasks as part of their role, will have different levels of ability in producing influential discourse. Given it represents a significant part of the purpose of their organisations, it would appear logical that policy actors seek to continuously improve their ability as sophisticated discourse producers. With this in mind, a simple guide for policy actors has been written and attached at appendix V to this thesis, drawing on the lessons from the close analysis of the policy discourse studied.

Compliance with Interactional Controls

The Green Paper used a number of stylistic and grammatical techniques to influence the way that respondents interacted with and responded to the Green Paper consultation. This section investigates the extent to which those attempts at interactional control: diversion to focus on particular sections of the Green Paper; use of consultation questions; wording choice; metaphor; word meaning and tangentiality, assessing their relative effectiveness.

Diversion to focus on particular sections of the Green Paper

The first theme in interaction-control related to the use of discourse to divert the respondents to focus away from Part B (focused on new private providers) and to focus more on other sections that were of lesser significance economically or lesser importance to Government. It was suggested that a measure of effectiveness of the discourse technologies deployed by the authors of the Green Paper might be an analysis of the balance of words written on each section. Specifically, it was contested that the TEF section (part A) was inserted into the Green Paper to divert respondents from the significance of the section around profit-making providers, (part B) giving policy wonks some familiar New Public Management measures to comment on: a task they might find enjoyable and where they may have felt they had competence. Questions were more open and expansive and the topics familiar to respondents. Similarly, it was proposed that Part D, which made few policy proposals of any significance, was intended to reassure research-active universities and research-intensive universities in particular, that little was to change in relation to research and the prevailing balance of power and resources in that area.

The table below shows the number of words written by each of the respondents on each of the four parts of the Green Paper together with the percentage of the total response that each part represents. Introductory sections and executive summaries were excluded as were footnotes. It can be seen that the responses from all respondents demonstrated high levels of discursual compliance – fitting the prediction that more words would be spent on the sections where the writing invited speculation and ideation and the questions were extensive and sought evidence and justification. As discussed above, the practice of answering questions asked in a consultation is so normalised that it is probably considered by most to be a common-sense finding. If the purpose of a consultation response is to further the interests of your stakeholder group, however, there is no necessary correlation

between those interests and the questions asked by Government. Rather, interests might be best served by spending most time on an extensive and convincing argument against those proposals least favourable to your members.

Table 3

Respondent	Equality impact	Part A		Part B		Part C		Part D		TOTAL (words)
		(words)	%	(words)	%	(words)	%	(words)	%	
GuildHE	416	5993	56	1321	12	1815	17	1595	15	10724
Million+	195	3227	41	1245	16	1767	22	1650	21	7889
Russell Group	0	3895	45	729	8	963	11	3062	35	8649
University Alliance	415	3509	40	1423	16	1079	12	2667	31	8678
UUK	87	5436	44	2381	19	2322	19	2299	18	12438

All respondents commented most on the section relating to TEF, with the Mission Groups with the most research-active members (Russell Group and University Alliance) dedicating the second most words to the section around research. Part B, the section relating to new entrants to the market, attracted least comment from all respondents except University Alliance, which had marginally less to say (12% as opposed to 16%) about the regulatory architecture than new providers.

Other interactional controls in the Green Paper produced lesser discursal compliance from respondents, however.

Answering questions

Most of the respondents followed the discourse convention of answering questions when they were asked. One (MillionPlus) used the on-line template for its submission, which further pushes respondents to follow the Government's direction by posing the questions and leaving boxes for completion. Only the Russell Group, the most confident of the responses, did not respond to the questions directly, although it did map a number of its comments to the questions asked.

The University Alliance response had a bold, succinct, confident writing style – appearing as a professional and 'insider' policy wonk, but without passion or strong position. It began its response with a free form 'executive summary' but did not crystallise or communicate its key messages here with power discourse. In the body of the response (which responded to the questions posed in the consultation) there is cross-sectoral referencing to other elements of the HE system, at the sub-organisational level of committees, functions and services, with a rather technocratic response. It gives the impression that the authors really want to be civil servants, or at least helpful to civil servants, and so accept the premises of Government policy intent and are moved to look at implementation, not engaging in the ideational debate, but being shifted to discuss how to implement the policies planned.

The Russell Group response is interesting in another way in relation to discourse compliance with a more subtle resistance. It frequently began a section of its response on an aspect of policy by welcoming an aspect of that policy, followed by a reframing of the original proposal from Government that the Group reports it is in support of. In the paraphrasing, word meanings and word choices are adapted, changing the emphasis to align with the Group's position. As such this can be recognised as a form of interactional control, almost a politeness stratagem, whereby a policy is agreed with whilst it is challenged through the reframing of the proposition, to give it new emphasis.

With the University Alliance response there was greater compliance with the interactive control of the Green Paper, following the cues to respond in the manner and at the level requested, after the initial short summary. It called for steady incrementalism and the testing and evaluation of policy as it proceeds through phased implementation but did not engage at a conceptual, cross-Governmental field or ideational level. University Alliance was quicker to accept the Government's characterisation of the past, accepting the need for change and moving to define how it feels the changes should be effected, without presenting evidence to support that need for change. (UA, 2016, p3). The section on research was so different in discursual style it was likely written by a different author, with a far more assertive approach and more frequent use of power discourse. The length of response also signals the importance of this area to the writer. For MillionPlus, there is less compliance with the answering of all clauses of a question, though it is unclear if this is deliberate or the result of a lack of time or care.

The University Alliance response exhibits strong compliance with the interactional control proposed through the questions of the consultation, with its response mirroring the wording of the question verbatim and following the instructions to provide evidence (e.g., (UniversityAlliance, 2016, p6). Its response was highly technical, considering the detailed policy instruments as they might be crafted and applied to best deliver policy objectives. In other aspects it showed less discourse compliance, continuing to talk of universities and institutions and drawing distinctions between them and 'alternative providers' and FE college providers of HE, using the generic term 'providers' less than the Green Paper asserts. Where it was ambiguous, the response usually lapsed into discussing universities and the differences between them, neglecting consideration of other provider types. This is, for example, the case in its consideration of the administrative costs and benefits of the TEF. It both accepted, without comment, the Government premise that the TEF would bring reputational benefit to universities; and went further than to discuss the benefits to providers (which might be thought to be its principal concern). Instead it set out what it sees as the choice for Government as being between 'fairness' and 'cost to institutions' and followed the request to give evidence of how, in universities, those additional costs could be minimised, with the suggestion that 'ministers and officials' might wish to visit University Alliance group universities to design administrative systems that might best align with their existing internal processes (UniversityAlliance, 2016, pp7-8).

Contrast this with the Russell Group approach which: did not answer the question directly; notes and expressed concern at the additional and unnecessary

administrative burden; proposed that risk-based regulation be applied, with the assumption that its own 'leading university' members should experience less burden on account of their demonstrating excellence (almost as a result of their tautological self-identification as the 'leading universities'); and warning that the costs of regulating (by implication) poor quality, new entrants, should not be expected to be borne by its larger, established, leading universities (RussellGroup, 2016, p15).

There is no consideration in the University Alliance response of whether the costs and benefits might be differentially experienced by different types of providers (question 7), or if the incentives for each was appropriate (question 9a), responding as anticipated, to the Green Paper discursal technique of asking a complex problem in the expectation of receiving a simplified answer from the respondent, one that substitutes a simple question for the one asked, as a heuristic to make the problem soluble.

Another example of the effectiveness of consultation questions as a form of interactional control is with the question in relation to the value of 'additional data being available'. The University Alliance responded to a particular question (question 13,(UniversityAlliance, 2016, p13)) with suggestions as to the value of different sources of data and a discussion of the performance of its members in relation to existing data. While the question (question 13) in the Green Paper is broad and vague, asking 'what potential benefits for decision and policymaking in relation to improving access might arise from additional data being available?', the only proposal made in the paper was very specific – to require UCAS to share its data with Government and researchers (subscribing UCAS members already received their own data) – a long-running micro-level dispute between universities and Government. The question successfully diverted respondents for the University Alliance and MillionPlus, to give more expansive responses and miss the attack on a body they currently own and control - UCAS.

Adopting wording used by Government

Arguably the wording, the label choices by Government for the Green Paper, is an attempt at securing compliance. It is a bold case of misdirection to the reader: this paper is about 'Teaching Excellence'. You will want to be identified with teaching excellence and so will want to support this paper. It is easy for respondents, as the Alliance and GuildHE responses do, to accept the value of the labelled thing 'Teaching Excellence' and then feel obliged to support the aims and objectives of the policy that is proposed to achieve it. They then feel further obliged to then respond on the level of suggesting amendments to implementation, as opposed to challenging the aims and objectives at a higher level.

Wording used throughout, the naming of particular actors, and the adjectives used, were attempts by Government to use discourse to have respondents follow its use of wording. On the whole this was unsuccessful with few instances of new terms used in the way Government used them.

Adopting the Government's re-defined meaning of words

This was a discursal cue that similarly had limited success. Respondents rarely adopted Government re-defined word meanings, keeping to the traditional, more

widely accepted uses. So, for example, Government's attempt to appropriate the term 'diversity', (generally regarded as a 'good thing' when attributed to student background) to refer to the merits of 'diversity' in the types of organisations permitted to provide English HE and gain access public funds, was not adopted by any of the respondents.

Using Government metaphors

In this area Government did have some limited success. There was use by stakeholders of the 'level playing field', with between nine and thirty-four uses across the different stakeholder respondents, reinforcing acceptance of the principle that all 'providers' should be treated the same and not, as they were prior to the White Paper, as fundamentally different kinds of institutions. Even the Russell Group, which argued that there was a risk of Government proposals 'unintentionally tipping the playing field in favour of alternative providers', implicitly accepts the logic of the Government's 'common-sense' assumption that there should be a 'level playing field' meaning parity of treatment for different types of 'providers', demonstrating the effectiveness of metaphor as a discourse technology.

The use of the term 'landscape' as a suffix metaphor to either 'higher education', 'research' or 'regulatory' was followed by all respondents. This led some to engage in a discussion about the desirability of a 'simplified' landscape, perhaps illustrating the metaphor's influence to prompt images of expansive views of open countryside that are better clear than cluttered with buildings (or regulatory organisations and protections). Similarly, the notion of there being an 'HE architecture' or a 'TEF architecture' appeared to have been widely used and accepted. Here again, the common-sense concepts to describe a social system of relationships between individuals and organisations involved in higher level learning is accepted as a structure that is designed, planned, built and occupied. No respondents proffered an alternative metaphor for higher education, such as an organism, rhizome, community, hive, or ecological system.

The notion of 'light touch' regulation was used by only two respondents, with respondents preferring to talk of how important it was to 'reduce bureaucracy' or 'reduce the burden' on universities. One respondent (UniversityAlliance, 2016, p3) did talk of 'hard-wired' elements of HE policy but not in the areas that Government was encouraging readers to think of permanence within. There was no use of 'barriers to entry' in discussion of new regulatory measures for controlling the organisations that can provide HE.

Reflections on Policy Actor Compliance

One purpose for analysing the Green Paper and Stakeholder Responses has been to understand the extent to which the discourse technologies used by Government in the Green Paper were successful in exerting power over the stakeholder policy actors and steering or influencing their responses. It can be seen through the close analysis of the discourse that stakeholder policy actors did comply with the intentions of the discourse technologies deployed.

Respondents were diverted by the questions, volume of text and the discourse deployed in questions. They spent most time and words on the familiar new public management elements of the Green Paper, accompanied by open questions and themes aligning with the predominant value-orientation of the field – positivity about diversity and widening participation and an interest in creating measures of educational quality to use as incentives. Other than with one respondent, the stakeholders also responded to the interactional control created by the posing of questions – answering all of them sequentially as posed by the Green Paper – and the deadline for the end of the consultation – submitting responses close to the deadline set for receipt of responses. Less successful were the attempts to lead the wording used or the meaning ascribed to certain words (such as ‘diversity’) which respondents eschewed in favour of their own language and meanings. Adoption of metaphors put forward by Government was however more successful, with the notions of ‘markets’, ‘architectures’, and ‘level playing fields’ engaged with by stakeholder respondents in ways that framed normative considerations of the purposes and forms of higher education.

Critical Discourse Analysis has revealed that strong interactional control can be exerted through discourse, validating the approach of using CDA to understand power dynamics and intent within policymaking processes.

Competition between Policy Actors

It is interesting to note the extent to which responses exhibit a tendency to seek competition with other stakeholders within the field of university relations as opposed to simply aiming to influence wider systems change. University Alliance for instance does not simply advocate positions of advantage to its members, it also advocates those that might be to the disadvantage of other universities – with the focus being on those most research-intensive universities represented in a large part by the Russell Group. It calls for regulatory measures to require compliance with widening participation and alternative proposals around research regulation that would be likely to disadvantage Russell Group members as well as advantage those from University Alliance. It is firm that ‘there is no evidence’ linking Research Excellence Framework (REF) performance or quantum of research income as proxies for research influencing teaching, but also that the concept of ‘learning gain’ (or value-added) is ‘notoriously difficult’ to measure – a recognition that other universities, more likely to be in the MillionPlus group, are likely to perform better on the ‘learning gain’ measure (due to the lower entry requirements and comparable exit qualifications). In discourse terms it uses word choice and politeness as well as verbs in their transitive form. It has less to say about the new providers entering the market.

Groups use discourse technologies to different extents to support their arguments. Whereas the Russell Group responses seek to paraphrase Government policy or the work of other review committees, the University Alliance response is more explicit in its inter-textual references, whilst still doing so selectively. For instance, the Russell Group says it welcomes the conclusions about the value of research concentration, whilst the University Alliance response argues the principle of ‘funding excellence wherever it is found’ (UA, 2016, p3) should be ‘hard-wired into

the system': they are both presented in discourse as being in agreement with Government policy, yet cannot both be so. The MillionPlus response (from a group aligned with universities with only pockets of excellent research) aligns with that of University Alliance, arguing that the funding of 'excellent research... wherever it is found' should be the *only* permissible link between government priorities and research funding allocated through Quality Research (QR) block funding (MillionPlus, 2016, p23, p24, p25). It connects its arguments with higher-order concepts of 'institutional autonomy' that it regards as common-sense unassailable goods (ibid, p24). It neglects, however, to strengthen its arguments with inter-textual references or utterances from those with power at super-ordinate fields (such as from the Prime Minister in the political sphere, or Sir Paul Nurse, chair of a Government review of Research Councils).

On the one hand these might be seen as examples of fighting the battles of the old era and neglecting the threat proposed by the empowered organisations of the new (profit-making providers) – universities squabbling between themselves while new organisations steal in to 'eat their lunch'. Alternatively, it might be seen as a rational position between universities at the point of the consultation where the fixed resources in the form of discretionary government funding pots are the ones to be fought over. If those universities feel confident in their levels of student demand, feel no threat from new private providers to that demand, and believed that income from student fees would continue to follow the student, without restriction, then it makes sense to seek advantage against those institutions they see as their primary competition for the resources that are fixed.

Similarly, it is perhaps not surprising to see this discursal competition in the area of research funding and administration, where the battle is for a share of resources reserved only for universities; where the matter has been the subject of long-standing debate since long before the previous two Research Assessment exercises (RAE and REF); and the key terms and definitions of principles (such as the value of 'critical mass' and 'concentration' or 'funding excellence wherever it is to be found'), the terms of discursal engagement, are well known to those stakeholders with a direct interest.

Even with the two so called 'representative bodies', GuildHE and Universities UK, the policy consultation response is used as an opportunity to reinforce their positions in the hierarchy of the field. Prior to the advent of 'mission groups' in the early 1990s, two organisations, Universities UK and GuildHE were given particular, special, consultative status within the HE policy field. UUK represented universities and GuildHE the smaller and specialist HE institutions, many of whom were HE colleges, of a religious or teacher educational nature. Of the two, GuildHE was the smaller in membership as well as income. As smaller institutions grew, became university colleges and then universities, and as specialist institutions were amalgamated through merger or acquired by universities, GuildHE began to lack the membership and resources to function as an effective representative body as its potential membership reduced and those acquiring university status moved to UUK. It diversified through offering to represent FE Colleges delivering HE and alternative providers, and came to represent a more heterogenous range of providers than either UUK or the mission groups. It was keen to maintain its

'representative body' status however and to distinguish itself from the mission groups that enjoy no such privileged status, yet increasingly became go to bodies for consulting with particular types of universities and other providers. As such the GuildHE response asserts its difference from the first sentence: 'This response is from GuildHE, a representative body for higher education institutions in the UK.', repeats it in the second paragraph ('As one of the two officially recognised, representative bodies for UK higher education...') (GuildHE, 2016, p1) and repeats this distinction later in its response. Its discursive approach is usually to consider issues and offer views on a range of implications, as opposed to asserting a clear view.

GuildHE is also not above using this positioning to covertly argue for the more sectional interests of its members. It had a number of the more established alternative providers and FE college providers of HE amongst its membership. They would gain significantly from the proposed reforms. Having already gained an established position in the sector, they would not however see benefit in the rapid entry to the market of new alternative providers that might challenge their dominant position amongst the private institutions. Thus the GuildHE response to the question about a single route into the HE sector is to argue for measures that slow the arrival of new entrants: 'speeding up the pace of travel along such a single route should not be the driving force underlying the change', 'It would be important to ensure a robust probationary period for those entering the sector', expressing 'concern' about 'provider[s] with a limited evidence base', highlighting 'greater risks' because of what it describes as the new 'lower bar' in making the initial award of degree awarding powers (GuildHE, 2016, p16-17).

The position of UUK is interesting for different reasons. UUK traces its history to 1918 but it was not until 2000 that it became a body representing institutions, formerly formally acting in the shared interests of a group of Vice Chancellors (as the Committee of Vice Chancellors and Principals). It has long enjoyed a preeminent position within HE policymaking and even following the creation of the more selective clubs in the form of the Mission Groups, all universities have maintained membership of Universities UK. The nature of policy development and implementation and sector regulation in the UK had for many years been one of co-development and co-regulation, as a number of sector respondents to the consultation note. Regulators, such as University Grants Committee, Universities Funding Council and then the HEFCE, typically had significant numbers of vice chancellors and senior managers on their Boards. Ad hoc policy reviews would be carried out by committees typically chaired or dominated by senior university figures. The array of agencies that implemented the strategies of the regulator would similarly be dominated by vice chancellors and senior university figures on their boards also. There was close formal and informal cooperative working between HEFCE and Universities UK and its members. Universities were familiar with possessing significant influence, Universities UK retained a significant professional staff and could convene and deploy its vice chancellors to use their intellectual and political capital to address a wide variety of matters of policy concern. As such it has had some significant success in insider influence over Government policy.

UUK speaks with a confident voice in its discourse. It references its own detailed policy publications, commissioned to present thought leadership within the HE policymaking field and beyond it. It demonstrates in its response a command of contemporary thinking and publications which it references in crafting its own policy narrative. It speaks in a remarkably dispassionate manner, as an organisation used to its position as jointly responsible for policy development. The dimension of inter-actor competition of relevance and evident here is not one in relation to other HE stakeholders but to where this HE policy originated and the adequacy of UUK's controls in seeing that it had sufficient influence over it. With the Green Paper proposing the abolition of a quango, in HEFCE, much respected and valued by the universities (as evidenced in its policy response) and HEFCE's influence over the content of the Green Paper being thus much reduced, the UUK response was at pains to emphasise its own role in co-developing policies to address Government priorities (see for example its commitments to co-working with Government in pages 1, 2 and 3 (UUK, 2016, p1-3) . It is not oppositional or assertive in tone, yet does use evidence-based arguments for continuity, assumptions of some elements of the system as being 'common-sense', and extensions to timetables, arguably to better achieve Government objectives. Its reinforcement of its role as co-developer of policy may indicate that it fears Government pursuing a wider shift in the balance of power in English HE policymaking: strengthening the civil service, weakening the quango that was subject to 'provider capture' and favouring consultation with elite groups (such as the Russell Group and its members) in order to weaken the collective power of a body like UUK. It may have feared that Government might see the organisation as akin to a trade union for the mass of vice chancellors (as it did explicitly in the Green Paper proposals relating to students' unions). As a government particularly wedded to free-market doctrines, this might thus not have been seen by Government as a positive organisation to empower.

It can be seen here that inter-actor competition in the field of universities and indeed other providers is played out through the medium of the policy consultation with each stakeholder seeking to influence Government policy in its interests. The fact that most of these arguments are not pursued transparently in the surface text, but through concealment and reinforcement with discourse technologies, points to the value of the CDA methodology to understanding motivations, responses and power relations in policy development.

It may be argued that linear policy development models explicitly recognise that different stakeholders will have different interests and the purpose of a policy consultation stage is to gain an understanding of those interests in order to maximise the aggregate utility from the resulting policy. As such, there is no subtext to be revealed and little need for a CDA analysis. However, the close analysis of the form of arguments made by stakeholders challenges that view. Lobby groups could say 'we represent organisations that look like this and have these sorts of issues. We see advantage to our organisations in proposals X and Y and disadvantage in A and B. We therefore support proposals X and Y and oppose A and B. They rarely do so. The fact that they do not do so points to the perceived value in the field of the use of sophisticated discourse in influencing policy and exerting power. Where they

do express their views so assertively and transparently, it is only where they are assured of their status in field hierarchies that it is to their advantage to remind the policymaking of their inherent power. Here again, CDA and Bourdieu's concepts of field and habitus are valuable therefore to an understanding of the ways that policy is actually made.

Stakeholder submissions and chronology

It has been argued that if the process of policymaking should be considered as a discursive process (Fischer, Frank and Gottweis, 2013) then the chronology and sequencing of publications of policy discourse submissions between participants in the 'discussion' should be investigated as a factor that can contribute to the explanation of the discourse. This is a dimension that has been largely overlooked in CDA literature. For example, an edited collection of papers focused on the application of CDA to policy analysis Montessori, Farrelly et al. (2019) (2019) feature ten different case studies using CDA to analyse different forms of public policy internationally. None of them deal with the exact chronology of policy actor exchanges to explore how the argument progresses. Similarly, in a handbook of critical policy analysis (Durnov et al., 2015), the precision of plotting stakeholder arguments in time is absent from the case studies presented.

This thesis has sought to investigate how significant was the chronology of policy actor utterances (consultation responses in this case) to the policy argument and eventual policy proposals. Rather than discussing policy ideas, concepts and arguments in the abstract, the study has attempted to consider the 'real-time' development of the argument, tracking which policy actor contributions might therefore have influenced the thinking (and written discourse of which others). Given that CDA methodology requires that inter-discursive and inter-textual connections be identified and followed, to understand power dynamics, it is sensible too that the dates or publication of important texts and bodies of discourse are known, in order to be able to ascertain which could have been influential and which could not. This chronology of the publications of significant texts is provided at appendix II, punctuated by the publications of the Green and White Papers that signify the beginning and the end of the policy argument discourse examined for this thesis.

For this particular study, the development of the policy argument is influenced significantly by the Government's organisation of the policy argument into a formal consultation exercise. The specification of a deadline for policy submissions meant that all policy actor discourse was published on or around the deadline for submission of consultation responses. Thus, there was little time for different actors to influence each other's thinking and policy responses through their published discourse. The information flows, whilst shared publicly, were centripetal, with Government at the centre as recipient of all submissions. The closeness in time of the different policy actor utterances did not afford the possibility of investigating the significance of the chronology of policy argument in this case. It is interesting to note, however, that the organisation of a formal consultation represents a form of interactional control of potentially influential policy actors, a matter that will be explored further in the next two chapters.

Power Relations and the Field

A further point for consideration in relation to the consultation relates to the structuring of power relations in the field and their influence over the policy proposals and questions itself. The Russell Group positions itself as being the group of 'leading' universities and indeed its institutions would appear to have considerable Establishment influence, both within the roles and recognition given (through the British Honours System) to Russell Group university vice chancellors but also the roles and status of its alumni and Board Members. Even if Government desired a major shift in HE to enable the taking of profits as a higher level objective, it may still wish to do this in a manner that minimises damage to certain types of institution, either in response to direct lobbying or due to field logics. Despite the presentation of policy formulation as being a linear and staged one, there would have been considerable discussion amongst a range of parties prior to the presentation of ideas in a Green Paper.

For UUK, influence is exerted at this stage by constituting strategic review groups and publishing policy think pieces, to which reference is also made in the formal consultation response (UUK, 2016, pp21, 24, 27, 28) and which have the advantage of also legitimising the response in the eyes of the members that it exists to represent. For a body like the Russell Group, however, there will also have been plenty of opportunity for influence over the shaping of proposals before publication of the Green Paper both in what was proposed and what was omitted. In some cases, this would negate the need to engage as actively in the discursive exchanges around formal consultation: the influence will have been exerted in other ways.

Discourse technologies and non-Governmental policy actors' attempts to exercise discourse power: Conclusions

The attempts from non-Governmental policy actors to exert influence over Government policy has been explored in this chapter. There are a number of conclusions that can be drawn from this investigation: about the use of discourse to exert power and about the relevance of CDA and Bourdieu's work in the analysis of policy development.

Government discourse technologies seem to work to some extent

The first conclusion is that Governmental discourse in the Green Paper seems to have influenced the behaviour and responses of the organisations examined. It set the tone, framed the arguments, shaped the issues to be considered and of course made proposals and asked questions about them in a particular way. It set the agenda for the policy discourse and was successful, through its use of discourse technologies, in directing the responses to it. This was evident in the quantity of words written by respondents, who used more of their total response on the areas focused on NPM approaches and research structures than on the more radical elements of the proposals in relation to new entrants and the powers of ministers and regulatory bodies.

This was less the case however in relation to the wording used in the Green Paper which was, on the whole, not adopted by respondents, who used their own terms to describe the different institutional types. In relation to the metaphors used by

the Green Paper (which might have socialised with respondents ways of describing key concepts and actors within HE) there was some adoption, such as the occasional use of the term 'level playing field' but in general little adoption of words themselves. Ideationally, however, there was a more subtle acceptance of one of the central tenets of the Green Paper, that it is illogical and unfair to treat different providers of HE differently depending on their organisational status. Governmental 'level shifting' appears to have moved respondents in acquiescence to the idea that if there is to be a framework for assessing the levels of excellence in teaching in English HE providers, then all providers should be subject to it, reinforcing the notion of parity between providers motivated by profit and those in established universities. None of the respondents mounted a high level conceptual or principle-based argument, or defence, for a system, prevalent in many countries internationally, where there are distinctions between public university institutions and private for-profit providers of education and training.

Discourse seems to matter in policy consultation responses

Secondly, discourse seems to matter. All respondents sought to use it as part of their argumentation, working with views expressed in the surface text and through the concealed layer of discourse. They did not seek merely to state their members, organisation, interests and views for and against. They sought to influence, conceal, re-frame and lever their power-base and positions. If policymaking were a process of linear, objective consideration of documented facts or even of the weighing of the aggregate opinions of stakeholders and their powerbases, respondents seem to have gone to a great deal of trouble to use discursive techniques to reinforce their arguments and exert power. Both surface text and discourse are important here as the ability to influence the White Paper is reflected in a change to the policy itself (the surface text arguments) but also in the way that in the White Paper discourse influences and frames the way the policy will go on to be described, legislated and then implemented. The descriptions and framing of the policies, the wording, word meaning, and relationships between actors and actions impact on the meaning of the resultant White Paper document: inter-discursivity and inter-textuality matter and make a difference.

Different discursive techniques are used by different actors

Thirdly, discursive techniques do vary. Different professional respondents adopted different approaches – some assertive, some supplicative, some working with vision and concepts, others with operational detail, some evidencing their confidence and sense of positional importance, others their technical competence as a policymaker or civil servant. Their effectiveness is dependent on actor ability, agency and context. There is evidence from comparing policy responses that policy actors exhibit different levels of ability in the use of discursive technologies. This is perhaps unsurprising: Aristotle argued that effective rhetoric requires persuasion on three levels - pathos, ethos and logos. Discursive technologies facilitate and represent ideas to appeal to each of these three. Different levels of competence in policy discourse will mean that some actors have a more limited range of techniques to draw upon in the construction of their arguments.

The second dimension, agency, is also important. There are many ways to win an argument. A skilled policy actor will develop their line of attack, marshal their

arguments and choose their discursive weapons for use. Just as the different elements of the Green Paper contribute in different ways to the whole, so too will different elements of the different actors' responses. Whether to label a policy 'lunacy' or to pick at its illogicality with reference to authoritative sources can be a matter of choice for a fully skilled actor and not all battles will be won, not all tactics found to be effective. Similarly, it should not be assumed that the sole or even principal purpose of a policy consultation response is to influence the policy as it is presented. As noted above, the Russell Group response is confident, assertive and self-important and as such does not seek to use the usual politeness strategies identified by Fairclough. The purpose of the response may be more about reminding ministers and civil servants that the members of the Russell Group are powerful and important and should therefore be spoken to informally, outside the formal, public, consultation process. For other respondents, the principal author may themselves be wishing to ingratiate themselves with the ministers or civil servants considering responses, in order to secure future employment within Government as opposed to seeking to influence it.

The third dimension influencing use of discourse technologies is context. The written responses are mediated by the context of their production. Each of the organisations occupies a position within the hierarchy of the field of English UK HE policymaking, both in the present, its history and its desired future. Respondents appear to be anticipating different perspectives to be expressed by other organisations and arguing with each other in relation to longer standing discursive themes than those being explored through the Green Paper consultation. In understanding their contributions, it is therefore relevant to understand the organisations' histories and relationships. Similarly, the sub-field of English HE policymaking is located within wider fields, of policymaking across Government in England, and within a UK context. Each respondent used discourse that located the Green Paper consultation within wider contexts and fields and crafted arguments that drew upon themes in those wider fields (such as maintaining the unity of the UK as a whole, or adopting arguments that might attract support from HM Treasury). Looking at that context too is important in understanding the discourse in use.

Methodological value of CDA for policy analysis

A fourth conclusion is that CDA creates a valuable framework for understanding policy contributions from different non-governmental actions. The issues identified above are illuminated through following the three-dimensional model that requires investigation of the text, the process of its production and its relationships with the prevailing social conditions. Use of the different discourse technologies identified in the CDA framework varied across the stakeholder respondents. There was relatively little use of evasive politeness approaches, false lexical cohesion, or substitution of terms. Metaphors were rarely used to create images that might support proposals challenging Government either through simile, metonym or personification, and the Green Paper's usage was occasionally followed, as with 'level playing field' or the less significant term 'policy landscape'.

Respondents were more likely to signal their values to align with current social and field norms (ethos). They frequently created a narrative in their argument through

the connections between different points and would often use cognitive verbs when being more assertive, with the verb softening the recommendation in comparison with a recommendation to do something specific, as in 'Government will need to consider...'. Uses of other forms of transitivity to suppress actors or give emphasis were more limited. The assumed 'common sense theme' was used relatively frequently, adding strength to arguments against those proposals viewed as most egregious. Respondents often used personal pronouns in their responses to signal a view of the organisation the respondent represented. Occasionally they used the term 'We' together with a 'common sense' theme to indicate 'We, the English HE policy community' or 'We, the citizens of the UK', to make a point particularly strongly. There was some manipulation of word meaning or an adherence to the traditional meanings that were challenged by the Green Paper, thereby rebuffing a discursive attempt at redefinition.

The two techniques most commonly used were the selection of words to either give emphasis and emotional charge and the use of adverbs and auxiliary verbs. These were used to either provide emphasis to points or, where the recommendations themselves were rather forcefully conveyed, to temper the tone of the argument. Their use varied by stakeholder and the position they were adopting within the policy field and in relation to other organisations, where for some respondents, assertive messaging in the surface text was reinforced with similarly blunt word selection and modalities.

The concepts of inter-textuality and inter-discursivity were similarly valuable to understanding the arguments by stakeholders and their origins and purposes. Sometimes the inter-textuality was overt – referencing or quoting from other authoritative sources or utterances from individuals regarded as having power in order to strengthen an argument. In other circumstances it was less explicit, where commonly used words from ongoing policy documents or debates were used, but not referenced, with their significance or relevance to the Green Paper consultation assumed. Similarly, other orders of discourse in super-ordinate and adjacent fields can be seen to have been relevant to stakeholder policy actors. A number of the respondents referenced themes in policy discourse in these fields to reinforce the arguments made in relation to English HE. While the Green Paper gave emphasis to teaching and research for instance, a number of stakeholders emphasised policy goals of regional community building, productivity and innovation and national coherence and identity in support of their alternative arguments.

Situational deployment of discourse technologies

Finally, it would appear that in relation to the application of CDA discourse technologies to policy discourse, certain technologies are more useful in certain circumstances than in others. This paper has explored whether these discourse technologies represent a set of techniques that can be deployed by any actors to exert power. From the texts analysed in this chapter it would appear that this is the case to a certain extent but not universally.

Fairclough identified the discourse technologies as part of the purpose of CDA to reveal power relations and deception within sub-texts produced as part of hegemonic discourse designed to perpetuate or strengthen the positions of existing

elites against emancipatory social change agendas of others. When applied as techniques to resist that hegemony and within the context of the frame and field of policymaking, it is perhaps not surprising that not all techniques are of value or are appropriate for use. Using discourse to avoid engendering a response from Government, when the purpose of a policy consultation response is to be noticed and prompt a change would defeat the object. What is required is a situational model for the use of CDA discourse technologies in policy discourse, one that provides guidance as to the likely appropriate and influential uses of different techniques in different contexts. This will be re-visited in chapter VIII following further analysis.

In the next chapter, the White Paper itself is analysed to identify what, if any, influence the responses from these five representative organisations had on the White Paper at a textual or wider discursal level.

Bourdieu and Stakeholder Responses: Accounting for misrecognitions enabling symbolic violence

University policy actors were in general opposed to the reforms but were limited in the force of their opposition. The Green Paper had set out to divert and disarm them and had, by and large, succeeded in doing so. It has been demonstrated how symbolic power had been exercised in the discourse of the Green Paper. It is worthwhile, however, in a heterogeneous field such as English HE, even amongst only the university representatives, to unpack whether and in what way policy actors misrecognised the symbolic power that concealed the economic damage being done to them.

There were some examples of misrecognition which were common to all policy actors studied. This is perhaps unsurprising given the common careers and roles of those working within English HE policy (Bagshaw and McVitty, 2019). They shared a habitus which led them to accept a number of premises, without question. Thus, the following examples of misrecognitions can be seen from the ways the stakeholder groups responded to the Green Paper:

- The Green Paper was positioned as being ‘about’ ‘Teaching excellence, social mobility, and student choice’, drawing on commonly held values within the field yet it failed to introduce measures that would advance these (in fact threatening to restrict student choice if they made the wrong choices and sought to use students’ unions to represent their interests).
- A Conservative Government talking of the importance of widening participation to narrow the advantages of the elite groups it represented and was drawn from might have been expected to be viewed critically, but the dominant status of that value amongst the doxa of the field was so strong as to make the belief that this was the genuine intention of Government
- Policy consultations are themselves misrecognised as genuine, democratic pluralistic processes that there is value in participating in, a feature of the sedimented NPM doxa of the habitus.
- The stakeholders also saw and were ‘naturalised to’ the exercise of inter-actor competition (one of the doxa of the English HE field identified in

chapter III) such that they misrecognised the need to compete with new actors in the field that were being empowered by the proposals, seeing continuity where there was radical change.

That competition also revealed itself in examples of misrecognition specific to the different stakeholders and the 'positions' they took within the field:

- The Russell Group responded to the proposals for teaching excellence to stress the primacy of teaching that was undertaken in the same universities in which highly rated research was carried out, equating 'excellence in teaching' with 'teaching in research-intensive universities'.
- The MillionPlus response promoted the primacy of HE's social mobility role in transforming life chances and was drawn into discussion of its members' stronger contributions in this respect in relation to other less egalitarian universities.
- The University Alliance in contrast stressed its modernity and efficiency in solving government policy problems, and the importance of practical applied research in providing solutions to day-to-day problems.

Thus, policy actors as a collective, can be seen to have responded to and misrecognised the symbolic violence exercised by Government with the Green Paper, but also to have acted with a degree of agency, albeit one that was also shaped by the doxa of the field, that of competition and differentiation between different university types. The meaning to the different stakeholder representatives of the different instances of symbolic power exercised by Government in the Green Paper was thus different and they responded differently and perhaps logically in relation to their position in the old field. However, their most significant misrecognition was to 'cognise' the Green Paper as a policy adjustment within the parameters of the field that they accepted, as opposed to a set of measures designed to bring about a new order and set of field logics. So familiar were they with the 'game' of consultation that they went along with the game, while paying little attention to the new threat being forced upon them, of the new order of HE privatisation.

It may even have been the case that for dominant actors in the field, the commitment to competition was heightened to the status of fetish as a particularly engaging form of symbolic violence. Naidoo argues that institutions and individuals in HE can be regarded as fetishizing competition, 'trapped in a kind of magical thinking which results in the belief that competition will provide the solution to all the unresolved problems of HE.' Fetishes invoke powerful emotions: 'feelings of power and pleasure as well as desire...[where]...'the invisible hand of competition provides the means by which no-one is responsible for negative effects apart from the victim themselves.'(Naidoo, 2018). In this situation, and particularly for those members of the field that found themselves in dominant positions, they gained emotional pleasure from the belief that they had won in the competition 'game' as a result of their superior talents. Even for those who had in the habitus of the old order found themselves in sub-ordinate status positions, such as those in GuildHE or MillionPlus, there may have been pleasure gained from playing the competition game. For these actors, the prospects of new less experienced game players, in the

form of private providers, entering field might even present the prospects for increasing their status, further increasing their pleasure in game playing and their perceived symbolic power derived from it. The risks associated with this gambit and the alternatives to it are returned to in chapter VIII.

Chapter VII: The White Paper

Introduction

This chapter continues the CDA analysis, progressing from the Green Paper and stakeholder discourse to investigate the form of discourse in the White Paper and the influences upon it. It follows a coding of the document against CDA terminology augmented by the analysis developed in chapters V and VI of this study. It begins with a summary of the development of policy proposals in the surface text between the Green and White Papers, then considers the way the discourse has evolved between the documents and where new discourse has been introduced. The second section examines the effectiveness of stakeholder attempts to exert influence over the White Paper, working at the level of the substantive proposals and the underlying discourse. It identifies areas where the White Paper adopted either policy proposals or the underlying discourse introduced by particular policy actors. The third section returns, at the conclusion of the discourse analysis, to the question of whether understanding the chronology of discourse between policy actors was a significant factor in revealing the development of either policy or the discourse that describes it.

The White Paper – using discourse to shift the meaning of the Green Paper proposals

The White Paper follows a standard discursual form for Government documents, moving from the ideational of the Green Paper to a greater focus on the technicalities and logistics of implementation. It is more explicit about how Government intends to implement the policies and gives greater detail on the timings of developments, powers of organisations tasked with implementation, and the scope of policies in terms of which areas of practice and organisations will be subject to new policy. Also following UK public policy development convention, it separates the concrete proposals of the White Paper from the published synthesis of stakeholder consultation responses to the Green Paper proposals. It is a discursual form designed to repeat the key points of the message, to reinforce them and encourage recognition, acceptance and recall. The document starts with a foreword - summarising the main arguments, followed by an executive summary, which includes a 'summary of decisions', then each chapter starts with a further summary: one quarter of the total document is given over to foreword, introduction and summary.

In many ways, continuity is stressed between the Green and White Papers. The sub-heading to the two papers 'Teaching Excellence, Social Mobility and Student Choice' are the same, even though the titles change from 'Fulfilling Our Potential' to 'Success in a Knowledge Economy'. Similarly, almost all of the proposed new policy organisations and initiatives proposed in the Green Paper are present in the decisions in the 'Summary of decisions' in the White Paper (BIS, 2016a, p18). The only substantive changes were minor ones: a measure enabling FE colleges to continue to deliver HE that were (apparently unintentionally) excluded by the previous proposals; allowing validating universities to continue to validate,

dropping the proposal that OfS may validate itself, but retaining the claim that validation services are restrictive. (p18, '...if validation services remain restrictive'); a clarification that the OIA's remit will cover all HE providers not just pre-existing registered providers; and the removal of a requirement for a probationary period of supervision for a new entrant by a validating partner. There were changes in emphasis and an evolution of the discourse in many areas, which are discussed later, yet the policy decisions, instruments and organisations, powers and proposals for legislation are almost entirely unchanged.

In another sense, however, it would be easy to see the White Paper as unconnected with the Green Paper. The framing of the precise measures, the arguments for their rationale, the chapter headings that provide structure and signposting to the intent of the document are all very different. While the Green Paper emphasised social mobility, tackling disadvantage, improving teaching, simplifying regulation, and reducing complexity in research funding in its headings, the White Paper focuses on 'Competition', 'Choice' and 'Architecture'. Despite considerable pages of text on widening participation and social mobility in the Green Paper, the only new policy to further these aims relates to the publication of greater data on outcomes for students from different disadvantaged groups, with all other initiatives being re-distributed responsibilities of pre-existing organisations or re-statements of pre-existing arrangements as if they were new.

From the perspective of understanding the policy development process, the Green Paper has framed a set of initiatives, organisations and proposals with discourse suggesting they are the solutions to one set of problems, and sought stakeholder views upon them, only to re-present the same apparatus with a rationale to turn it to pursue a rather different set of policy aims. The ways that the discourse of the White Paper does this are explored in the sections below.

Discourse in use

As noted above, the White Paper uses discourse to re-contextualise the same policy proposals, instruments and organisations that were described in the Green Paper. This section explores in more depth how the discourse evolved to give the substantive proposals new meaning.

Continuity, Change and Politeness

The White Paper title 'Success in a Knowledge Economy' gives a very different emphasis to the paper to the Green Paper's 'Fulfilling Our Potential'. The latter was fulsome in its concern for widening participation in HE, referencing the Prime Minister's own discourse, and spoke at length about the importance of HE for social mobility. Thus 'Fulfilling Our Potential' might reasonably be regarded as indicating a concern to reduce the structural inequalities that inhibit the ability of some of the population to achieve positive outcomes from a higher education. The White Paper locates the proposals more in the economic sphere and one where competition (and notions of success and failure) are more prevalent. Notions of 'knowledge economies' are often associated with consideration of how countries may compete more effectively with others in a global market, albeit a market where the creation and acquisition of 'knowledge' are regarded as essential at both the system and individual levels. This shift in focus is reinforced by the chapter headings of

‘Competition’, ‘Choice’ and ‘Architecture’ in favour of Green Paper themes of ‘Teaching Excellence, Quality and Social Mobility’, ‘The higher education sector’, ‘Simplifying the higher education architecture’, and ‘Reducing complexity and bureaucracy in research funding’.

The common usage of the words teaching excellence, social mobility and student choice, suggests a continuity in focus, however the contents pages of the GP and WP demonstrate a different emphasis: foregrounded is 'Creating a competitive market', 'choice for students' and 'updating the regulatory architecture', as opposed to 'teaching excellence, quality and social mobility; 'The higher education sector', and 'simplifying the higher education architecture', 'reducing complexity and bureaucracy in research funding'. The active verbs (or in the case the 'choice' the nominalisation of them) are more focused towards the real intent: less about normative goods and more about specific alterations to the status quo. Whilst one might regard this as a natural development from vague ideas, refined through stakeholder consultation feedback into necessarily more concrete proposals, it might also be considered to represent an exercise of discursive power in at first concealing the real intent of proposals before the public consultation, then hardening the proposals and making them more explicit, not in response to encouragement from the consultation but precisely because the consultation, a phase in an apparently linear process, was over and the real intent could be signalled more clearly.

Perhaps unexpectedly, where Government has received feedback that proposals are unworkable or is convinced that proposals were not appropriate, in most cases it did not present these as a change but as a continuity, implementing the original proposals but adapting their implementation such as to remove the significant changes. This politeness strategy involved a presentation of continuity of original intent and making it appear that there was agreement with what the Green Paper proposed, amending the substance of the proposals subtly to avoid engendering further significant resistance from powerful stakeholders it did not wish to stimulate opposition from. Through adopting this argumentation technique, Government was able to maintain the appearance of authority, through the continuity discourse inferring that there has been no change to policy proposals, whilst making concessions to stakeholders with power and influence in areas of no significant consequence to Government

Tangentiality

It is also interesting to note that the separation of consultation responses from the conclusions, whilst improving the simplicity and readability of the White Paper, is a discursive technique that serves to empower the Government publisher of the policy in the development process through the creation of an artificial separation of the forum of policy debate and the policies themselves that result from it.

Reading across from the summary of consultation responses to the final conclusions and proposals requires practical effort and intellectual flexibility - inconveniences which many would not be concerned to undertake. It has already been identified that Government adopted the forms of academic discourse to reinforce its arguments in the Green and White Papers, whilst not adopting the

rigour of appropriate referencing. Here again, Government adopts a discourse form conventional within the field (of publishing a separate summary of consultation responses). The evidence from those consultation responses did not support the conclusions drawn by Government. Indeed, many of the responses in the summary are critical of the Green Paper proposals, as seen by the contributions from the policy actors studied that represent the largest numbers of HE providers. This fact is not carried across in the White Paper itself, which, by convention, presents the Government's final proposals more clearly, and which, in this instance, ignores many aspects that stakeholders are critical of. The use of a conventional discursive form in policy consultation can be seen here as a form of misdirection, typical of effective discourse technologies.

As with the summary of consultation responses, the concurrent publication of the 'TEF Technical Consultation for year 2' (BIS, 2016c) expands the detailed issues of the design of the Teaching Excellence Framework within a separate document. Again, this is common in conventional English policy discourse as a mechanism for dealing with the operational matters of how to implement a policy. Viewed critically, this can be seen as an example of two things: first, 'level shifting', identified as a potential new 'discourse technology' in the analysis of the Green Paper in chapter V. In this instance, matters are presented as within the operational or 'technical' domain, shifting from the ideational or policy intent level. It is important to recognise that analysis of such documents (which this study does not seek to undertake) should also be considered critically for their ideational and ideological content and not be influenced by the surface text discursive direction that these are matters of minor technical and practical detail. Second, the separation of the TEF proposals for consultation from the proposed original policy intent in the Green Paper and the framing of that intent within the final White Paper proposals similarly makes it more difficult to follow the consistency of the policy, attracting less scrutiny about the meta-level policy and its proposed implementation. This is particularly important given the White Paper's reframing of the original policy instruments set out in the Green Paper, affording a further opportunity for misdirection of policy actors.

This study has proposed that 'tangentiality' (the act of positioning an important policy proposal off the critical path of the narrative of the policy argument, 'at a tangent' to it, so as to conceal its significance) should be considered a new discourse technology to augment the Fairclough Three-Dimensional Model of CDA. The separation of policy proposals and definitive decisions from the stakeholder feedback on the proposals and the technical details of some aspects of them, as described in the paragraphs above, can be seen as the application of this technology at the level of discourse structure and inter-textual relationships, whereas previously its use was identified only at the textual level, within particular paragraphs of discourse.

Discourse evolution - development in the discourse from the Green Paper

The discourse of the White Paper is different to that of the Green Paper in a number of ways. Instances of new discourse, not found previously in the Green

Paper, are discussed later in the chapter. More commonly found in the document were subtle changes in the discourse, eight instances of which are described below. Each illustrates examples of different discourse technologies identified in Fairclough's three-dimensional model, together with the additional concepts for the model proposed in chapter V of this thesis: simplification, the use of time and power discourse.

Simplification and the move from ideational to technical discourse

There is a great deal of technocratic detail within the White Paper, evolved through civil servant desk work on how to implement a policy, rather than through responding to the consultation comments on the Green Paper. The analysis of the proposals from the HE sector representatives in respect to the teaching elements does not seem to have been influential in shaping the substance of proposals or the discourse, but that will be established with the detailed comparisons made for this chapter. More interesting from the perspective of analysing discourse and power is the continued use of narratives of simplification and simplicity in establishing causation and historical narratives. It takes two forms in the White Paper: the first is the notion that policy proposals are a simplification of previous arrangements contrasting their apparent simplicity with the complexity of what went before. For example it proposes that 'We will 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, p24), states that 'We will...bring together the 7 Research Councils within a single body...' (BIS, 2016a, p17) and claims multiple organisations are being rationalised into the single Office for Students. 'Simplification' would appear more important as a discourse technology than the actual substance of the reforms. The predecessor organisations all continued to exist after implementation, just under different hierarchies of accountability and Government declined to undertake a regulatory impact assessment of the proposals. Many argued at the time that the changes would create significantly more bureaucracy and complexity not less.

The second form relates to simplicity in 'grand narratives' of explanation, causation and rationale for the White Paper proposals. For example, it states that 'Competition between providers in any market incentivises them to raise their game, offering consumers a greater choice of more innovative and better quality products and services at lower cost. Higher education is no exception.' (BIS, 2016a, p8) and 'The TEF will provide clear, understandable information to students about where teaching quality is outstanding. It will send powerful signals to prospective students and their future employers, and inform the competitive market.' (BIS, 2016a, p13). It also identifies (from p7-8) what it believes are a series of weaknesses in the HE system (failure to 'fulfil its potential' in social mobility, economic growth and cultural enrichment, uneven access to HE, inflexibility in models of delivery, insufficient innovation in teaching, skills shortages in STEM areas, graduates taking 'non-graduate' jobs and differences in lifetime earnings by subject and institution). All of these are caused, it asserts, by 'insufficient competition and a lack of informed choice.' (BIS, 2016a, p7-8). This might be a bold claim to suggest all these factors could be solved in their entirety by more competition and greater choice, yet the presentation of simple policy solutions

plays to the psychological attractiveness of mental heuristics: shortcuts through complexity to aid problem solving.

Targeted Argumentation and Politeness: the emphasis on research
The main focus of the Green Paper was the changes to which organisations can provide teaching in HE and the way that is measured. It is surprising therefore that the White Paper dedicates a large amount of prose (over 4500 words in the sections from page 66 onwards) on the changes relating to research, while making no new substantive proposals in that area. The section only re-announces proposals by Sir Paul Nurse that Government confirmed previously that it would implement; proposals which were a minor evolution of closer working relationships between the seven research councils and Innovate-UK that had been taking place over at least the prior 15 years.

The discourse intent seems to be to emphasise strongly the very limited extent to which the proposed new system architecture for research (with knowledge exchange attracting a minor mention) will change the status quo. There is similarly a great deal of stress on continuity with the preceding system.

As discussed above, the paper positions these proposals as a significant simplification of the policy agency landscape ('replacing 10 bodies with 2') but in the detail explains that all seven Research Councils (RCs) and Innovate-UK will continue to use their insignia and titles, that the Secretary of State can specify hypothecation of funding to each RC and to limit the extent to which the new 'Research & Innovation UK' body can really re-balance funding between RCs. While the organisation does have some additional status, there is a strong disciplinary influence apparently at work which, despite to Nurse recommendations on the value of multi-disciplinary research solutions to contemporary problems, ensures significant autonomy for each RC. This is reinforced by the stress given to the so called 'Haldane Principle' that academic subject experts should make judgements on which research should be supported.

Why does Government invest so many words on the research policy area, when it makes so few, minor, policy proposals? The balance and focus of the discourse would appear to suggest that there may be powerful stakeholders as yet unconvinced by the Government's proposals who require further reassurance of the minimal impact on their own areas of interest – subject-based academic research. It can also be seen that structurally, a new overarching body with responsibility for all research is important to the policy reforms to around teaching that Government is most concerned to implement. Whilst apparently tangential to the main purpose of the policy changes, the research reforms are important enablers to the dismantling of HEFCE and creation of the new OFS. HEFCE had a role of providing a strategic overview of the financial health and sustainability of the university sector and the distribution of significant Government funding for research capacity - the so called 'QR' or 'Quality Research' funding. Government needed an alternative designated body reporting directly to a minister to fulfil this function, if HEFCE was to be removed.

If a powerful academic research lobby could not be convinced that the new organisation was acceptably benign, it might undermine the rationale for abolishing

HEFCE, undermining other central elements to the reforms. The Government's discourse, through the extensive argumentation and a 'politeness strategy' designed to downplay significance and placate powerful stakeholders, revealed a number of things: the degree of research stakeholder power in the field; underlying power struggles with those stakeholders in the face of negative views expressed; and the relative priority to Government of the different policy proposals.

Reduction in ethos signaling: the downplaying of widening participation and disadvantage

A dominant theme of the Green Paper was the extensive signalling by Government of an ethos aligned with the doxa of the English HE policy field – that widening participation in HE is 'a good thing' and that 'disadvantage' restricting academic and career success should be tackled to support greater 'social mobility'. In the White Paper these themes are significantly downplayed. This is a feature of the structure of the document, with its chapter and section headings, but also in the frequency of usage. For example, the terms 'disadvantage', 'widening participation' and 'social mobility' are used over 20% more in the Green Paper than the White Paper (266 to 221 respectively).

The differences in ethos signalling between the Green Paper and the White Paper can also be seen to reveal Government's confidence in its power in relation to stakeholders and in the success of its deployment of discourse technologies in the Green Paper which, as was seen in the analysis of stakeholder responses, successfully diverted them towards the value-imbued policy themes of widening participation and disadvantage, that they were most comfortable with. This Government confidence allows it to be more explicit in its policy intent in the White Paper. It enables it to use the limited oppositional response from stakeholders as a platform for extending its marketisation agenda still further, emboldened to no longer mask its intentions with the levels of ethos-signalling discourse used in the Green Paper.

'Common sense' themes and level-shifting: the assertion of market logics and drawing on (and respecting) the power of others

The White Paper shows a stronger focus on competition and the economy and reveals the greater confidence of Government in the eventual success of its policy proposals. It continues to assert, without question, the logic of the market and its application to higher education. This is a continuity theme, as it was part of the argument in the Green Paper, but it is given greater emphasis in the White Paper. As discussed above, whereas the Green Paper sought to mask its intent with considerable ethos signalling and alignment with the anticipated values of the policy audience, the White Paper does not. It is stripped of much of that and is more straightforward in revealing Government's belief in the market and competition as the solution to many issues in HE.

It is interesting to consider if this greater explicitness in asserting market logics was the result entirely of activities within the sub-field of HE policy – whether it was a response to the relatively muted responses in opposition from the stakeholders to the Green Paper proposals. CDA advises to look at the social conditions of discourse production. As such, it is important to remember that the field of English

HE policy is a sub-theme to the field of UK Government, and is subject to those power dynamics also. In the White Paper, there are apparent attempts to address inter-departmental concerns about proposals by accentuating the extent to which the jurisdiction of higher status Government Departments, the Home Office or Treasury (two of the three 'Great Offices of State'), are not being transgressed by the BIS proposals - respecting the cabinet hierarchies of different ministers within central government. These may have been as concession to secure cabinet support in the face of expressed concerns, it may have been inserted anticipating concern being raised, or as the result of civil servant or even ministerial discussions between departments. Where such apparently incongruous references appear in policy discourse, it invites the critical reader to explore further the reasons for it and to question the power dynamics that might be at play in the shaping of the policy in question.

The continued use of power discourse: stating policy arguments with confidence

It has been argued that where a producer of discourse is writing about a topic of particular importance to them, where they are particularly keen to exert power over others, they deploy a high density of CDA-identified discourse technologies within a particular paragraph or section. This was identified in both the Green Paper and in a number of the responses from stakeholders. In the White Paper, setting out the Government's conclusions as to what policy will be implemented and why, power discourse continues to be used. The structure for the Executive Summary and chapters of the White Paper is usually to begin with a confident statement of what is required and why the Government's proposals are the appropriate solution and it is here that power discourse is used most often (see for example para 30-34 page 14; para 35-38, page 15; box 1, p21-22; p42; p62-63, para 1-3). Discourse is confident, opinions are stated as fact and causality is simply attributed. Values are signalled, 'common sense' themes assumed, and particular word meaning, adjectives and adverbs used consistently without explanation. Metaphor adds to the picture and politeness strategies are used where the interests of particular stakeholders have to be respected.

Paragraph 5 on page 7 provides a good example. Here 'higher education' is identified as having great potential, but that students are 'dissatisfied' and worse, employers are 'suffering'. Then responsibility for this seems to be transferred to existing 'providers', where the paragraph discusses, in abstract terms, structural inequalities in society and puts the blame for them at the door of current 'providers' - the term university is still really used mentally to describe 'proper universities' of the pre-1992 variety, and so criticism of institutions is (as in the rest of the document) directed to 'providers' not 'universities' - politeness strategies to keep from criticising the 'proper' universities.

Pseudo-academic discourse and argumentation: An extension in depth and volume of usage

The practice of using the form of academic discourse and the conventions of referencing academic publications in support of argumentation, without connection to the appropriateness of those references, was identified in analysis of the Green

Paper. The practice continues in the White Paper, though with greater depth and in greater quantity. Were references properly used, it might be concluded that this signalled there was supposedly greater consideration of relevant literature after the policy proposals had been devised as opposed to before their creation. This might have suggested less a process of 'evidence-based-policymaking', and more one of 'post-hoc academic justification'.

The practice of 'pseudo-academic discourse' highlights a different feature of discourse production, however: the desire for policy proposals to appear to be supported by academic literature. Here the White Paper continues the Green Paper practice. Evidence from some literature is misquoted, and in other cases is referenced as supporting Government policy arguments where the original sources do not. For instance, research by Palfreyman & Tapper on page 12 is referenced (footnote 24). The research refers to US HE not UK but is described as identifying a risk which 'undoubtedly already exists in part...' in the UK. It goes on to argue that a 'disengagement contract' exists between academics and students. They argue this is a situation whereby the interests of academics, who are principally motivated by the desire for more time for research, and students, who are motivated by the desire for maximum grades with minimum effort, coalesce to produce a situation where low levels of student engagement in their studies is accepted yet grades are not compromised. The research does not even evidence this empirically in the US, let alone the UK, yet the White Paper states that in the UK this alleged disengagement contract is 'demonstrably' not in the best interests of students..., using this as a justification for the UK reforms proposed.

Wording and word meaning: a new emphasis on 'Competition' and 'approved' and other examples

i. Word and phrase frequency of use

Wording used in discourse is an important factor revealed by CDA. Word count analyses must however be used carefully. They can give a misleading account of the meaning and balance of documents without a connection to the context of those words - 'diversity' for example is used in both documents to describe both students with protected characteristics and the entrance of new types of providers to the market. 'Access' might be used to reference a private provider's limited 'access to the market' or a learner from a disadvantaged background gaining better 'access' to university education. There are some striking features in the usage of words across both green and white papers, however. More sophisticated analyses of phrases rather than word counts can provide better understanding of changes of meaning and intent. Both are explored below.

The word 'approved' enters as a far more significant feature of the discourse, used 58 times (0.17% of the document) compared to just 8 usages (0.05%) in the Green Paper. Incumbent (and incumbents and incumbency) doubles in usage from 5 to 10 uses. The word private is never used in the white paper and never used in relation to providers in the Green Paper (only in relation to private investment in research and private acts of parliament). Neither is the word 'profit' used in either document. 'Ownership' or its derivatives is similarly rarely used (only once in a footnote in relation to 'wholly-owned' subsidiaries, and on three other occasions in reference to the QAA as a 'sector-owned' body. In the White Paper it receives no

mention in relation to providers, though obliquely references 'taking account of ownership-structures' when proposing liberalising use of University Title for organisations with more than 55% of students at HE level (thereby excluding FE colleges). By contrast, the term 'quality' surges in usage to 181 from 137, with an apparent need to emphasise the way quality is to be protected or even improved through the proposed measures. Two specific examples of the significance of word choice and of word meaning are described below.

ii. 'Approved' providers of HE – word choice signalling power dialectics

A first interesting example of evolutionary discourse relates to the new term of 'approved' to describe categories of HE provider whose students can access Government loan support for tuition fees. In seeking to align all 'HE providers' within a single system of funding and regulation, the White Paper creates new terms, or categories, of HE provider. A different maximum fee (that a provider is permitted to charge up to) is set for each category of provider. The names for the three categories that providers can apply for are, rather clumsily, 'basic', 'approved' and 'approved (fee cap)' - confusing because the 'approved' designation caps fees paid by the State, but at a lower level (£6000) than the 'approved (fee cap)' status which has a higher cap (£9000) but which can be increased by up to inflation.

Why were such confusing terms chosen and does the discourse reveal a power dynamic at play? It may well be an example of discourse being used to speak to more than one issue: Issue A relates to the level of fees which universities have been able to charge. This had been politically controversial since first introduced by a Labour Government and later significantly increased in value (from £3000 to £9000) by the Coalition. There was concern at allowing universities to increase their fees and so the notion of a category (in which all universities were likely to sit) titled 'fee-cap' may well have given the impression that fees of universities could not be further increased. Issue B, those keen to expand private provider access to HE and change the second-class status that those institutions had previously enjoyed as providers, may find the notion of being an 'approved' provider (charging £6000 where many private providers had been positioned in the market) attractive.

iii. 'Competition' – changing its meaning to support the policy argument

A second important evolutionary discourse theme is that of 'competition'. This is foregrounded in the White Paper in both the ethos of the title, a chapter heading and in the usages of the term – a 600% increase (including the derivative 'competitive') from 11 to 66. The more frequent usage of the word is also given further emphasis in the White Paper by the application of three additional discourse technologies – the emphasis of competition as being a matter of 'common-sense', the use of quasi-academic referencing, and the adaption of the meaning given to the word 'competition'.

At the level of 'common sense theme' there is an assumption of marketisation as the logical and sensible course of action in the White Paper. This is illustrated on page 9 of the White Paper. Here a very weak attempt made to present logical, evidenced, argument to establish the connection between competition between providers and improved productivity or GDP. Rather than demonstrate this empirically, discourse is used to compensate for the lack of substantive evidence-based argument, using academic discourse and quasi-research to quote academic

papers that do not support the argument. The White Paper quotes an international literature review that shows the correlation between the size of university sectors and national GDP. The research itself makes no mention of competition between providers. The White Paper however references the research as evidence of the value of competition between 'providers'. It also fails to consider the notion that a 'provider' of HE courses and a 'university' might be different and thus that the validity of the findings may not be more widely applied to evidence the impacts on GDP of a much more heterogenous range of HE 'providers'.

It is interesting to note that there were over 280 providers of higher education in England in 2016 that were not regarded as 'private-' or 'alternative-' providers. They all competed for business in a competitive market. It was a market facilitated by regulations that improved information for buyers and sellers and reduced transaction costs: commercial 'information brokers' created league tables of suppliers for consumers to compare. Government required information about 'products' (such as different aspects of the student experience, the ratings of those experience by previous customers, and proportion of graduates gaining high grades) to be provided by suppliers in standard formats to improve consumer decision making. Marketing spend by most universities was significant, to the extent that some commentators have speculated as to whether this is a good use of funds in a sector supported largely by state, or state-backed (student loan) funding (Matthews, 2012; Gill, 2013). There was diversity in types of providers and types of products. It was possible to study part-time, on-line, in an accelerated more intensive study, studying subjects from surf science to philosophy of science, in providers a different as Grimsby College, a further education college and Cambridge University, an international research university established over 900 years ago. It was competition by any definition, albeit in a regulated market with a capped price. Discourse is used to challenge this notion.

'Competition' as used by the White Paper is synonymous with introduction to the market of an increased number of private providers, a 'common sense' theme that is never addressed. Neither the Green nor White paper consider whether there is sufficient competition, the purposes of competition, and any disbenefits to be mitigated. Neither consider the types of competitor and advantages or disadvantages of each. 'Competition' is taken to mean the need for a greater number of private providers, with the assumption that there is no competition without them. It is assumed that new entrants are required for this competition and, as a play to the minor themes of Conservative HE policy, the need for other providers to exit the market is stressed. In short, the universities attended by cabinet members (typically Russell Group members) and the educational businesses of their associates are to be protected, enabled and encouraged. Meanwhile the other universities should be facilitated to exit, in part to make way for the new providers. Other providers, such as further education colleges, long the mainstay of flexible, accessible HE, can be largely ignored, in substantive policy consideration and in discourse.

Competition and its increased prominence also illustrates another feature of the way the Three-Dimensional model helps to understand an aspect of how hegemonic discourses are established and sustained within multi-stakeholder policy

environments. The White Paper asserts that there is not enough competition and that it needs to be increased (BIS, 2016a, p10). It uses quasi-academic discourse to support this and references an excerpt from a report written by the Competition and Markets Authority (CMA) in support of the policy of creating more competition between providers. The CMA is a Non-Departmental Public Body (NDPB); an organisation created by Government for the purposes of furthering its aims, with guidance to the NPDB and resources often provided on an annual basis to help it to fulfil the function allocated to it by Government. NDPBs are notionally independent from Government and in this case Government uses its supposed independence to support its policy case for greater competition in HE.

The CMA published a report investigating competition in HE markets and concluded that 'aspects of the current HE system could be holding back competition and needed to be addressed.' (Authority, 2015) which Government quotes in the White Paper. It is an organisation which, by its nature, accepts and propagates one of the doxa of the field, one of the 'common sense' themes, evident in its conclusion: It assumes, as Government does, that competition is the most important thing in any aspect of public life. Thus, it expresses the view that 'the current HE system could be holding back competition', whereas other policy actors in the HE sub-field might reasonably assume that a high functioning 'HE system' might be the most important policy goal, with the question to be asked being 'does greater competition help improve HE?'. Furthermore, it takes a view over the appropriate course of action that might be regarded as extreme. In concluding that the system 'could' 'hold back' competition it recommends that this 'needed to be addressed' as opposed to the conclusion that 'more research is needed' which might have been the conclusion from another actor.

It can be seen that in a field where policy is presented as being developed through argumentation between different stakeholders, it is advantageous to a Government's policy argument to be able to create powerful new institutions acting in the field with specific remits. It can then quote publications from those organisations, with their quasi-independence giving weight to its arguments in a way that quoting one of its own civil servants would not do. This becomes visible by considering the conditions of discourse production as well as the discourse itself and is evident in the study of the White Paper.

Competition can be seen through discourse analysis to have been particularly important to Government. This was demonstrated in the choice of words, the changing interpretation of their meaning, the presentation of market systems as a 'common sense theme', and the use of academic forms of discourse to appear to justify the value of competition in higher education. Its meaning was also evolved, from competition being regarded as present in a New Public Management marketized system of publicly funded HE, to a definition that saw only markets with private-for-profit organisations supplying services as qualifying as demonstrating that 'competition' was present.

From ‘Student protection in the event of provider exit’ to ‘Market exit as an indicator of a ‘healthy’ market’ – Theme, metaphor, conjunction, and adjectival emphasis

The discussion of instances when HE providers may stop providing education to students is instructive in showing the development of the marketisation theme and its concealment in the Green Paper, contrasted with the most assertive, pro-competition, focus of the White Paper. In the Green Paper the chapter dealing with this was entitled ‘Provider exit and student protection’. It is prefaced with a paragraph providing a rationale for considering the possibility of ‘provider exit’ as being the recent influx of private providers, contrasted with the stability of ‘the sector’. The term university is avoided and the subsequent paragraphs give the impression that it is likely to be the new, agile, innovative providers that may come and go, necessitating the introduction of measures to provide students with protections, and leading to proposals for ‘a student protection requirement’. The emphasis continues to be on how to protect the interests of students given that ‘exit’ may be an unfortunate disbenefit associated with the greater innovation, quality and choice presented by new providers. Government, through its agent the OFS, would provide assistance to ‘struggling providers’ ‘in the public interest’, with a number of examples of when and why it may intervene provided. (BIS, 2015, p55-56)

In the White Paper, the marketizing intent and its place as the main purpose of the reforms is clearer. Under a section entitled ‘Market exit’ it states ‘[Market exit] is a crucial part of a healthy, competitive and well-functioning market...The Government should not prevent exit as a matter of policy.’ (BIS, 2016c, p38) and places responsibility with providers for ‘ensuring their sustainability’ with the Government’s interest now limited to ‘ensuring that affected students are protected if their provider is not able to deliver their course.’ There is no reference to public interest concerns in relation to geographic availability of provision or tackling disadvantage. It is Government that exits, agnostic as to the wider impacts of providers stopping teaching and leaving the market to determine value, shape of the sector and focus of provision.

Using time as a discourse technology: projecting anachronism, lineage, and future legacy

The White Paper continues to use references to time as part of discourse designed to persuade readers of their arguments. There are three types of usage evident in the document. The first relates to organisations, concepts or policy structures that proposals seek to abolish or change. Whilst it may have been sufficient to propose that arrangements could be improved, the concept of time is used to add power to the argument by suggesting they are anachronistic. For instance, the structure of regulation is described as being designed ‘in the early 1990s for an era...that has now passed.’ and as such unsuited to today’s HE. HEFCE is also described as ‘outdated’ in its purpose, role and powers.

The second usage relates to the referencing of history to create a sense of lineage and justification for the reforms now presented. For example, in a narrative rationalising further diversifying the organisations that can be permitted to provide HE, an argument is made describing the ‘rapid and significant transformation’ of the

HE sector over the preceding thirty years, in which first polytechnics, then HE colleges and specialist providers of HE, became universities. (BIS, 2016a, p22). It also uses again, as the Green Paper did, a historical reference point common and particular to much contemporary English HE policy writing: the argument that policies now proposed deliver on the 'Robbins Principles' of higher education set out in the report of the Committee on HE chaired by Lord Robbins in 1963 (as described in more detail in a previous chapter). The move of policy actors to become recorders of history should also be explored critically. The White Paper for instance documents major developments in English Higher Education as occurring only during periods of Conservative Government, without reference to policy reforms under the ten-year Labour Government (BIS, 2016a, p13).

The third usage looks forward, confidently foretelling the positive impacts that a policy proposal will have in the future or predicting the course of implementation through the identification of milestones. The White Paper predicts for instance that the proposals 'promise to make a great higher education sector even greater.' and sets out a timeline in relation to the TEF and the reform of degree awarding powers signalling the intended implementation. It is less important that these events come to pass or that the timelines are followed or even feasible once policy implementation is considered, more that their articulation at the point of policy ideation adds power to the arguments – there is a bright future and there is a plan to realise it!

New discourse

New discourse can signal a greater transparency in the policy intent of the actor, the result of the influence of a particular stakeholder, or the introduction of new language considered to be more powerful than that previously used. There are just three instances of new discourse that features the White Paper. These are described below, together with the CDA property they relate to.

'Co-regulation' – transitivity, politeness, and vagueness

The term 'co-regulation' gets increased emphasis in the White Paper. It is used only once in the Green Paper ('recognising the benefits of maintaining a co-regulated approach...' p59) whereas in the White Paper it was used six times. This seems to be in response to the BIS Select Committee having reported on the Green Paper proposals and Government adopting the spirit of its recommendation to retain the independence of the QAA. Co-regulation is not a term used by the Select Committee report, but a Government term capturing compromise between two positions: 'Minister and OFS-led' and 'entirely independent of Government and its agents'. It is also a term propagated by stakeholders in their consultation responses: used twice by GuildHE, once by MillionPlus and twice by UUK.

New 'High quality' providers – adjectival emphasis

As the intent of the policy proposals become clearer in the White Paper, with competition from new private providers acknowledged as the goal, the White Paper adopts with significantly increased frequency a new term to describe those providers. In the Green Paper there were just twelve references to the alternative providers as 'high quality' though by the White Paper the number of such references increases to twenty-nine. There appears a deliberate effort to convince

the readers that the new providers that will be enabled to deliver HE more quickly at higher price and at greater volume, as opposed to less likely to meet threshold quality standards and delivering poor value for money as found by the QAA and National Audit Office. Other new adjectives also describe these providers as 'Innovative' and 'challenger' institutions, in contrast to the 'incumbent' providers who rarely have their evidenced quality recognised. The discursual technique reinforces a message that all new providers are high quality providers.

Adopting, adapting, and exaggerating discourse from other texts and powerful policy actors - Inter-textuality, level-shifting, and modality

As noted above, the White Paper makes inter-textual references to reports from individuals and committees with power and influence within the field (Professor Sir Paul Nurse, Lord (Professor, Sir) Nicholas Stern, and Professor Dame Ann Dowling). Following the Nurse Review of Research Councils, (Nurse, 2016) Government borrows a phrase from Nurse (how research involves the '...translation of knowledge into innovation...' Nurse 2015, p3), and adapts it to make it sound more exciting and ambitious. It becomes a sub-title for the White Paper, changed to 'Translating world class knowledge into world beating innovation'. By mirroring the discourse of a powerful actor within the field, the White Paper seeks to legitimise its policy proposals. By exaggerating the wording, it seeks to suggest that its proposals both contribute to delivering that shared purpose but also make claims of more significant future impact as well.

The Effectiveness of Policy Actor Discourse: Stakeholder attempts at influence over the White Paper

As a main purpose of a HE lobby organisations is to influence policy and secure change within it, it is valuable to understand how each of the stakeholder lobby groups studied did nor did not influence the policies of Government through the written discourse they used. This is examined below in relation to the White Paper. Stakeholder influence over changes to the substantive policy proposals are explored, as is any influence over changes to the discourse: As language describes and influences behaviour, imbuing it with meaning, the influence of policy lobbying organisations over discourse, particularly as it is used in the White Paper to re-frame and re-purpose the policy actions proposed, could be seen as significant.

The stakeholder influence over the substantive policy

As noted above, the substantive changes to the policy proposals between the Green and the White Paper are limited, thus the impact of any particular stakeholder over the policy proposals themselves, where the stakeholder proposed a change, will be even more limited. There were however some areas where changes made aligned with the proposals of the lobby groups and also instances where support for Government proposals in the Green Paper might be regarded as having increased the surety with which the White Paper restated those proposals.

Equally, there were some instances of explicit inter-textuality, with Government referencing stakeholder responses to the Green Paper consultation as evidence of the sense if its proposals. Finally, it is also relevant to analyse the discourse used by the lobby organisations in any of the areas where they sought policy change and it

was achieved, to understand, particularly, if aspects of ‘power discourse’ were in evidence. These issues are explored below.

i. Support for a shift to greater competition between providers

The first and obvious point is that in relation to the major shift in the policy between the Green and White Papers, the increased focus on the value of greater competition between providers and the benefits provided by new entrants and the exit of incumbents, none of the stakeholders studied had called for these measures. Government had not made that the principal thrust of the Green Paper and most respondents had not chosen to highlight it as a potential consequence which should be resisted. There were no questions asked in the consultation as to the pros and cons of greater competition - this was a ‘common sense’ and unstated underlying belief – and so those respondents that followed the direction to their responses in the form of the questions posed in the consultation, had no room to address it. The Russell Group, which adopted a more freeform approach to its response, projected a view of being rather too important to be concerned with the arrival of alternative providers though it did question whether, with a large number of HE providers already, more providers were a sensible way to distribute resource, echoing an argument in research funding it frequently put forward – public funds go further if they are concentrated in the largest and most prestigious institutions.

ii. Students’ Unions – measures to ‘increase transparency’ and ‘strengthen accountability to their members’

The proposals in relation to students’ unions were universally opposed by those studied respondents expressing a view. GuildHE, Alliance, Million all used ‘power discourse’ in their opposition. UUK noted that ‘It is also important to point out that [students’ unions] are not trade unions’ after the Green Paper linked the two, though was less effusive in its defence of the value of students’ unions. There would seem to have been some degree of influence over the White Paper but only in the tone of the justification. The GuildHE point that the vast majority of students’ unions are charities and hence regulated by the Charity Commission is turned in the White Paper to a note that ‘many but not all students’ unions and guilds are regulated as charities by the Charity Commission.’ (BIS, 2016c, p60), making it ‘difficult to determine how effectively the current oversight of the sector is working.’ The reference to trade unions was removed. The invitation in the consultation to propose new measures to regulate students’ unions not having been taken up by consultation respondents, the White Paper continues to communicate scepticism about the organisations but waters down or defers the intent to a commitment to ‘discuss this work with interested parties, and consider what further steps should be taken as we establish the OfS.’

iii. Timing and pace of the introduction of the TEF

One small success perhaps would be the calls for the timing and pace of introduction of the Teaching Excellence Framework to be extended as respondents argued implementation was unrealistic on the original proposed timetable. A matter of less importance to Government - it was argued in previous chapters that it had only limited interest in the TEF itself and that the TEF’s purpose was to divert attention from the more radical privatising policy proposals - Government was

happy to make minor changes to the roll out of the stages of the TEF. A change of limited importance.

iv. Limiting the scope of the proposals relating to research

A combined lobby of stakeholders, including some of those studied for this research, appears to have produced a change in the tone of the research proposals between the Green Paper and White Paper and a tighter definition of the scope. The Russell Group response was extensive in its detailed recommendations as to action it advocated Government took in relation to research and the things that it recommended should not happen. Its central demands were adopted by Government: providing increased security to the continuation and independence of the dual support system for research funding and enshrining in law the dual support system and preservation of the Haldane Principle; separation of decision making arrangements for allocation of QR and other research grant awards; continued independence of the individual research councils and continuity in their independent funding, even under RIUK; the continuation of the REF. Feedback from University Alliance gave similar feedback, albeit with a more positive response in relation to the involvement of industry in decision making about research and innovation priorities. Universities UK, representing universities of all kinds is more measured in its tone but calls for the same changes, albeit with a longer section emphasising the benefits of a strategic body (HEFCE) responsible for the totality of the HE sector contributions, able to see the interconnections between teaching, research, knowledge exchange and widening participation. Whilst this latter point was not accepted by Government, the stakeholders, together with others not studied for this thesis, would appear to have been going with the grain of Government intentions but also secured some changes in the measures proposed.

v. Recognising FE colleges had been excluded

With the priority in the Green paper being the facilitation of access for new private HE providers, Government had not noticed that its proposals risked disenfranchising a group of the existing provision that it was broadly happy with: FE college providers of HE, who for many years had been the alternative provision to university and HE college education. It corrected this anomaly in the White Paper, citing feedback from stakeholders as leading to the change. None of the HE stakeholders studied, even GuildHE that represented institutions who were FE colleges, made any reference to it, however, so cannot be said to have had an influence.

vi. Failure to amend institutions subject to the Freedom of Information Act
In order to maximise the attractiveness to private providers of entering the HE market, the Green Paper proposes that Government explores removing all HE providers from the Freedom of Information Act. This would include existing universities and colleges as well as new private providers, applying its principle of creating 'a level playing field' and putting all providers outside the public domain. Not all respondents expressed a view, ignoring this aspect in their responses. Of those who did respond, MillionPlus argued that the rationale was unclear and proposed considering public and student interests whilst reducing the costs of compliance for 'universities and other providers'. The Russell Group simply welcomed the proposals to exempt universities. UUK welcomed a review, arguing

for a 'level playing field' and proposed the removal of the public interest test applied in universities (effectively accepting arguments for the treatment of universities as wholly private organisations), whilst noting its members' support for openness and transparency.

The resolution was rather confusingly presented, but this presentation illustrated how the exercise of power within a field is constrained by the operation of power within higher level fields. In this case, a Cabinet Office review of the working of the FOI Act as a whole concluded that universities and colleges should remain designated as public bodies and be subject to the Act. The White Paper concluded that in the light of this 'and the responses to our consultation' '[Government] will retain the current approach.' The approach it went on to describe did not then retain the current approach but did in fact bring some newly approved private providers into scope for the FOI Act should they become 'approved (fee cap) providers' (BIS, 2016a, p38). This neither maintained a level playing field, nor removed universities from recognition as public bodies, nor considered the burden of FOI compliance on HE providers. As such, the HE stakeholder respondents could not be regarded as having influenced the change.

vii. Quality assurance arrangements

Arguably the most significant change between the Green and White Papers that was argued for by stakeholders related to the quality assurance arrangements for teaching in HE. The strength of a lobby in favour of the QAA and the importance of continuity for its role would seem to have been responsible for producing a change to Government discourse in the White Paper. In addition to its adoption of the term 'co-regulation', the White Paper included a significant quantity of convoluted text about OFS having the power to recommend sub-contracted operations to the Secretary of State but being permitted to implement aspects itself only where there is not a suitably qualified third-party organisation presenting itself. This effectively required the OFS to let the contract to the QAA should the QAA seek to choose it. This represented both a significant discursive change and a change of substance, agreeing to constraints on the freedom of the OFS to competitively tender, or provide itself, the quality assurance services for English HE. The same principle was also applied to HESA, though with less feeling and detail. As noted above, this is not explained as a change in response to stakeholder demands but a clarification of a position articulated in the Green Paper.

Stakeholder influence over the discourse of the White Paper

Some changes to the discourse of the White Paper do appear to have resulted from stakeholder input.

i. Co-regulation

As noted above, there are four references to the concept of 'co-regulation' across three of the stakeholder responses studied, which would appear to have some part in Government's adoption of the term to placate a number of stakeholders unhappy principally with the proposals put forward for a quality body under the more direct control of the OFS, in contrast to the more favoured QAA body which has operated since its creation under the principle of co-regulation. Many university stakeholders feared the adoption of a different model of quality assurance akin to

that used by OFSTED in the English schools and college system, with an inspectorate under the direction of Government ministers.

ii. A greater focus on the significance of research and the economy
A number of stakeholders, but the more influential Russell Group and UUK responses in particular, gave extensive defences of the economic value of research and the dangers of greater Government direction to the ability to exploit the full potential of that research. This would appear to have concerned Government sufficiently to shift the balance of the White Paper in comparison with the Green Paper to add extensive additional words and assurances to mollify the concerns of the research lobby.

The effectiveness of policy lobby organisations in influencing Government policy

Government policy and its discourse saw a significant evolution from the Green to the White Paper. Discourse technologies appear to have played an important part in that shift. They were used in the diversionary effects of the Green Paper. It framed the consultation as being about technicalities, the measures of establishing teaching quality and widening participation and did not pose questions about the intent of the policy proposals, competition and privatisation. Discourse was also used to shift the focus towards competition in the White Paper, retitling sections and being clearer and bolder in the intent, whilst using the language of the Green Paper and the discursal form of supposedly responding to stakeholder consultation responses, to emphasise continuity and participative approaches to policy formulation.

Were the principal HE lobby organisations effective in their attempts to influence Government policy? On the basis of this detailed study of the most significant piece of HE policy for thirty years, it cannot be said that they were. The impact their policy responses had over the substance of Government policy proposals appear negligible. In relation to their impact on the discourse of Government, whilst there were minor changes, these too could not be said to have had a major impact on reframing the understanding of the policies the discourse was describing or altering the parameters of acceptable policy options.

These organisations may provide other useful services to their members, but in this central function of policy influence they appear to have had limited impact. Even for the one organisation that exhibited the most assertive discourse and would appear to have had most influence, the Russell Group, it would appear difficult to disentangle its agency in influencing policy from the wider field dynamics and habitus of the English public policy field. The member institutions and their senior individuals represented by the Russell Group already enjoyed elite status and position within the field. The lobby organisation may have refreshed and republicized that influence, but its discursal exchanges with Government and the resources put in to produce and sustain them would seem to represent questionable value to its members. For the other organisations, that influence was even less strongly felt.

Unresolved issues in the development of the White Paper

This study has analysed the policy development process leading to the 2015 Green Paper and concluding in the proposals in the 2016 White Paper, charting its development through the critical analysis of discourse used by policy actors in Government and in policy lobby organisations. This section addresses three questions arising from this analysis: first, was the chronology of policy actor discourse publications a significant factor in understanding the development of policy? Second, has policy actually developed through the formal 'visible' processes described by Government? And third, have policy lobby organisations have been effective in securing changes to the policy proposals consistent with their own positions? It concludes with a statement as to what has been learned about the process of development of policy set out in the White Paper.

Chronology and the conditions and timing of the White Paper's production

One of the hypotheses in this research has been that despite the concept of the process of policy development being one of argumentation (Fischer, Frank and Gottweis, 2013), policy studies rarely consider the precise chronology of when different policy actors make their contributions: policy arguments are considered in the abstract, rather than as a dialectic debate where each contribution influences each subsequent contribution. Does a richer understanding of the process of policy development arise from consideration of the timings of the contributions, revealing discursal, textual or ideational lineage? Such an analysis needs to consider in the first instance contributions at the sub-field level, such as English HE policymaking, or indeed more narrowly the Green Paper consultation, but also the supra-level fields, such as UK politics or policy more generally. The breadth and levels of such analysis will of course be a matter of judgement, but discursal changes within the sub-field between two events (such as the Green and White Papers) which cannot be explained through developments in the field may be indicators of the need to look at significant other developments in related or higher-level fields which could have an influence. Having completed detailed analyses of the Green Paper, stakeholder responses and the White Paper it is appropriate to consider if the understanding of the chronology of policy formulation has aided the understanding of how policy was made.

For this study, a chronology of the major policy publications in the field of English HE policymaking has been prepared, mapped with the precise publication dates, contributors and classification of stakeholder type. Also included are selected pieces of discourse from policy actors at higher levels where these are deemed to be significant to the process of the White Paper's production. This is provided at appendix II.

i. Summary of changes in the HE policy context and wider English public policy
Published contributions are recorded from December 2010 when the Prime Minister David Cameron gave a speech on widening participation whilst head of the then Coalition Government; a document referenced in the Green Paper and other policy actor consultation contributions. The intention is to show some of the changing discourse and arguments prior to the Green Paper as well as the timings of contributions that may have influenced the White Paper.

It would appear to have been a complex time in English HE policymaking, with a considerable number of, often overlapping, documents, reports and publications indicating an expectation of change in the approach to regulation and quality assurance of education and measurement of research. The Coalition and Tory Governments led by David Cameron pursued an agenda of austerity and privatisation across the public sector, yet the Coalition Government was unable to agree over the applications of these policies in legislation. The 2011 HE White Paper 'Students at the heart of the system' signalled the direction and was referenced by Jo Johnson, Minister for HE in the Cameron Tory Government as the 'unfinished business' that the Green Paper sought to address.

In the period from 2010 the quango charged with regulating and assuring the quality of HE, HEFCE, sought to create measures and approaches but was widely regarded (HE-Commission, 2013; Morse, A, 2014) as being without the appropriate tools to manage the rampant private HE providers on the one hand, and to promote widening participation, the supposed policy of the Coalition and Conservative Governments, with decreasing levels of resource. The year 2015 saw a series of policy proposals aimed to pursue these agenda, whilst on the other hand, a 'lighter touch' was pursued in relation to research, supported by a backlash against the use of metrics to measure research excellence, an agenda associated with the previous (Labour) Prime Minister Gordon Brown from his period as Chancellor when he drove an approach to use data in a more sophisticated measure to assess impact. HEFCE CEO Madeleine Atkins might appear to have been rather less obsequious, rather too wedded to pursuing the avowed policies of the Government (in widening participation, supporting research excellence 'wherever it is found', and developing measures of value added for universities), and rather less elitist than Conservative ministers desired. An agenda to dismantle the HEFCE began, with the Sir Paul Nurse review of research councils in November 2014 a first foray into considering alternative organisational architectures to the all-powerful HEFCE with its funding and regulation of both teaching and research, and the Government-sponsored and erudite 'The Metrics Tide' report from James Wilsdon in June 2015, cautioning against a growing use of metrics in the next Research Assessment Exercise (known as the Research Excellence Framework, or REF), in contrast to the last, HEFCE-managed, RAE2014, the results of which were published in December 2014.

- ii. Using the chronology of policy publications to help understand the process of policy formulation and argumentation

The discourse of both the Green Paper and White Paper exhibit inter-textuality, referencing explicitly published speeches and the content of publications. Less explicitly, but used as a discourse technique is reference to the fact of Government-sponsored reviews of aspects of HE policy being underway, signalling a supposed need for reform.

Similarly, and perhaps more subtly, the White Paper references reports from quangos created by and answerable to Government, as if the organisations were independent organisations (such as with the report by the Competitions and Markets Authority finding that there could be a more competitive market created within the HE sector (Authority, 2015), rather than ones bounded by specific

articles of association. It also references reports from other genuinely independent groups, such as the Higher Education Commission (HE-Commission, 2013), which called for change in the pre-White Paper HE system, as evidence of support for its proposals for greater market liberalisation, when the report in question called for change because of the inadequacy of controls over private HE providers.

In the White Paper, Government continues with its approach of quasi-academic discourse used in the Green Paper, as noted above. In this approach it misquotes publications in footnotes as evidence of support for its policy proposals, perhaps in the hope that few will investigate the veracity of its claims and referencing. Thus, the simple existence of publications on the topics dealt with by the White Paper were influential in bolstering the logos of the argument, regardless of their ideational content.

It could not necessarily be said that the published discourse influenced the policy development process in an argumentation sense, however. Where policy proposals, empirical evidence or argument did support the Government's argument, it quoted it. Where it did not, it quoted the existence of the publication or report, as if it were in support of the proposals, without any connection to its argument. It would appear that whilst understanding the content and argument of preceding discourse was of some use in understanding how discourse is used to exert power, it was less valuable in understanding the development of policy ideas and argument.

A final dimension to explore is whether, during the period following the Green Paper's publication and the publication of the White Paper, different pieces of published discourse from different policy actors influenced each other. Were discursal or ideational themes from chronologically earlier contributions responded to and built upon by later contributors? There is some evidence of this, but it would appear limited. References to prior reports of their own organisations and to the views of respected third parties were made by some organisations. GuildHE referenced both the HE Commission report and the views expressed by the Director for Fair Access. UUK referenced the work of one of its own sub-committees and the Russell Group referenced one of its own prior reports. MillionPlus drew attention to the National Audit Office report critical of the detrimental value for money presented by new private entrants. There appears to have been no explicit influence (or at least reference) to the contributions to the consultation made or planned by other policy actors and no evident discursal themes between related organisations. This is not to say that there were not such connections and conversations about policy influence tactics by stakeholders with related interests, but in the written discourse there is no evidence of an organised approach to create consensus and maximise combined influence.

Another factor militating against policy development being the outcome of a process of argumentation is the fact that the policy actors studied were all lobby organisations representing collectives of stakeholders. Representative body policy contributions are themselves not the work of a single policy individual whose mind can be changed as the result of a well-crafted argument, but the result of a long process of synthesis and agreement of policy positions. Even were some individuals minded to change their views, the machinery of governance in representative

organisations and the limited time for consultation would make such changes difficult to achieve.

Here, the interactional control of the discursive form of a 'Policy Consultation' is influential. It may have been assumed that in a highly networked policy community, with electronic media enabling almost instantaneous exchanges of information and views, the directions of power and influences might resemble a net, with multiple connections in highly diverse meshes of policy argumentation within the field. The Policy Consultation with its Government Proposals (in a Green Paper), set 'Consultation Questions' to be answered by all respondents, and a 'Fixed Deadline' beyond which consultation responses would not be considered forces policy actors into more binary relationships. With limited time and an approaching deadline, policy actors focus on the questions to be answered and to be sent to Government, as opposed to debating in fora in ways that might give birth to new policy ideas to challenge those proposed in the Green Paper. The principal communication channels become less 'mesh-like' and more like spokes in a wheel, with the stakeholders at the rim and Government at the centre. The process concentrates power in the hands of the instigator of the Policy Consultation, (Government), affording it the opportunity to synthesise and re-formulate, but making such practice in the wider policy community less likely.

- iii. Interim conclusions on the methodological significance of chronology in researching the policy process.

The examination of published policy discourse presented in a chronological timeline would appear from this example to have some utility in relation to tracing the ideational and discursive lineage of policy over extended time periods. Despite modern communication technologies enabling close-to-real-time policy debate, the precise chronologies would seem less significant, however, particularly where the instigator of policy, Government, is able to exert interactional control through a policy consultation that creates centripetal force. The formal consultation concentrates communication flows and power with Government. It also influences the timing of stakeholder contributions such that they are mostly made at the deadline of the consultation period. The potential implications of chronology for the understanding of methodologies of policy research will be explored in more depth in the concluding chapter.

The process of policy development and the White Paper: exploring the formal 'visible' process

Having completed analysis of the White Paper it is now possible to address the question of whether policy has been developed through the process described by Government. The process is supposedly a transparent and objective one: Government issued a set of policy ideas in the Green Paper and consulted all interested parties with a stake in the outcomes. This would enable Government, through the consultation, to use the collective expertise to inform improvements to the policy proposals and achieve the best policy outcome. It may feasibly have been the case that policy development could be tracked transparently through analysis of the surface text arguments put forward by different policy actors, in the way set

out in Government's description of the policy process. This study has demonstrated that policy was not made in this way.

The influence of stakeholder policy actors

There was limited influence by the professional policy lobbyists over Government policy evident in the White Paper following the Green Paper consultation. Government's own published synthesis of all consultation responses (BIS, 2016b) did not demonstrate stakeholders exerting significant influence over the policies that emerged in the White Paper. Where they exerted minor influence, it is also not clear from the arguments in the surface text why some stakeholders were successful in securing minor influence over policy development and others did not. Some policy lobby organisations did have some limited influence over the White Paper, however. The extent of this appeared to be rather more in the amount of text used by Government to reassure and mollify certain stakeholders in its response in the White Paper, rather than change the substance of Government policy proposals.

A CDA approach to policy analysis looks at the text, the conditions of discourse production and the socio-cultural environment (or fields) that provide the context for that production. With this analysis it can be seen that certain stakeholders did appear to have influence over the discourse used within the White Paper in two circumstances. The first was where particular stakeholder used its most assertive discourse to make its points. The second was where stakeholder used 'power discourse' in their consultation responses, combining a number of discourse technologies in high density. In these limited situations, stakeholders did appear to have some impact on the extent to which the White Paper addressed their concerns. It also led, in some cases, to the White Paper adopting limited text, phrasing or concepts put forward by a stakeholder in their consultation response. These were not present in the Green Paper and may thus have been indicative of some stakeholder influence.

Explanations for the level of stakeholder influence

An explanation for the limited influence of stakeholders can be found through the CDA and Bourdieusian approaches to analysis. The Green Paper the Government used many discourse technologies to shape and manipulate the responses of stakeholders (see chapter V above) with some apparent success. Stakeholder consultation responses submitted were thus often somewhat diminished in their potential impacts or effective opposition. In addition to the specific influence of these discourse technologies, from Bourdieu's approach we can see that the logics of the field of English HE policymaking may also have served to limit the influence of opposition to the Government proposals. The HE sector response was largely prosecuted in line with the English policymaking habitus. It contributed views politely, answered questions posed in the consultation, and responded in the timescale and form requested. The people it employed to make their responses were part of the same career and professional networks.

Despite the radicalism of some of the Green Paper proposals, the professional lobby organisations for the HE sector did not pose a more vehement rejection of the policy in discourse, ideology, or substantive policy proposals. None of the

stakeholders studied were supportive of the Government policy changes. Yet these stakeholders exerted little influence. They 'played by the rules' and were beaten. The doxa of the field may have determined that to act differently was 'not the way things are done'. It is therefore not possible to know what would have been the effectiveness of an alternative strategy. It is however possible to speculate as to what the response of Government policy actors may have been if there had been an assertive discourse from stakeholder policy actors within the field. Government actors may have been prompted by the same doxa to temper their own discourse in order to avoid appearing to act in discursive response in a way outside the doxa of the public policy field. It would be interesting to examine other pieces of radical government policy pursued in England to compare strategies, responses and impacts, to extend this nascent understanding of the discourse technologies and strategies in a wider range of use cases.

Locating the discourse of the White Paper within the power structures of the field

The Government discourse changed between the Green and White Papers, though largely not in response to stakeholder influence through their consultation submissions. There was a quite significant change in the assertion of market logics for the new HE system the White Paper was proposing. As this was not apparently due to the influence of stakeholder written submissions, it is necessary to consider other possible reasons for this change, even if not resulting from the discourse studied in detail for this thesis.

It is not until one examines that aspect of Fairclough's model furthest from the text itself, the socio-cultural context in which it is produced, that faint glimmers of how policy was made become evident. Here Bourdieu is valuable too. The notion of fields and field hierarchies (of supra- and sub-fields) signal the importance of exploring developments at higher levels. His methodological tools are useful too within the field of English HE policy, giving a sharper attention to the power dynamics, to the dulling effects of field doxa on the conditions of discourse production, and the sub-conscious impacts of habitus on the policy actors seeking to influence Government policy. These are dimensions not revealed through charting the exchanges in the surface text of Government and policy stakeholders and are explored below.

The supra-level field of UK Government policymaking and politics
Whilst the notion of a policy cycle as a linear process of stages is recognised in the policy literature as insufficient to explain how policy is made, it is perhaps useful in this study for considering the reasons for the change in concepts and discourse. The Green Paper took popular topics, themes and discourse. In some cases, it applied new meaning to those themes, discourse and topics. It did so, recognising the values, experience and passions of its audience, and the discourse that this audience was comfortable with. Some months on, in the White Paper, and at the point of presenting policy for detailed implementation, the headline discourse changed. Themes of greater markets, competition and choice were more assertively and frequently used than in the Green Paper. The proposals for policy change were set out in more detail, as might have been expected. They were,

however, also framed differently. The section headings used to organise the text were different and there was a greater clarity of the policy intent, now stripped of the obfuscation caused by using the preferred discourse of the audience for the Green Paper.

Identifying the change in discourse is helpful but does not provide reasons for the change. In the supra-level field of UK government policy, there are developments at the time of the Green and White paper that are worthy of further investigation. Reforms to bring greater marketisation were introduced across many departments of Government. Thus, the reasons for the shift to a more explicitly market-driven policy may have emerged from a greater political and ideological confidence in this wider field, across Government. Analysing only the text or indeed only stakeholder interactions within the sub-field of English HE policy would not lead to such an explanation.

Power dynamics in the English HE sub-field

There were differences evident in the levels of stakeholder power within the field of English HE policy, with some also exerting influence in the supra-field of UK political elites. In the White Paper, of those stakeholder organisations studied, most attention was given by Government to one group: the 'old' and 'ancient' research-intensive universities represented by the Russell Group. This was the group that represented the university alma mater of the members of the Cameron cabinet (Sedghi, 2015). These were institutions with most political power and influence within the supra-level field of public policy; institutions with the longest history of connections with the English political elite. Least note was given to those representing the largest grouping of 'new' universities, MillionPlus, which, despite providing higher education to by far the largest number of students and citizens, appeared to have negligible impact over the White Paper.

The question of policy actor agency, or lack of it, is also pertinent in this regard, within the sub-field of 'Research Policy' touched upon in the Green and White Papers. The stakeholders in the area of academic and commercial research with greatest influence are those same universities ('old' and 'ancient') that have considerable political elite power. These are represented by royal institutes dating back many years, institutions whose importance in the English elite is symbolised by the large, London-based properties that house their headquarters. This also is reinforced by the lack of ministerial political confidence in 'taking on' this aspect of policy. Ministers and civil servants might all regard themselves as having a valid and informed perspective on undergraduate education: all would have been through it, and achieved, intellectually, at that level. The typical lack of such experience at the level of doctoral or post-doctoral levels, and certainly in relation to internationally leading knowledge creation, makes ministers less confident in establishing any agenda for research that is not controlled by researchers themselves.

It is commonly held (though with limited empirical evidence, see (Enders, Jürgen, 2013; Capano, 2020)) that the benefits of this lack of ministerial 'interference', or of 'institutional autonomy' are that it produces better research performance. Even were this true, it does not explain why this might prevent elected Governments from intervening in the higher education fields of policy, where they will often

intervene in other fields of professional practice such as school education or medicine. The lack of confidence demonstrated by ministers, arising from their lack of personal experience and perception of intellectual inferiority, and the evident power of institutions and individuals linked to them within English policy elites, suppressed ministerial desire to lead policy change in this area. The evident deference of ministers to academic research interests is a characteristic of the habitus of the field; concepts that help with the understanding of policy and its development.

The Government interactions with this connected group of institutions with elite power may also help to explain the change of discourse between the Green and White papers. As noted above, considerable effort was made in the White Paper to document the minimal impact changes proposed that would have on the central interests of old, research-intensive universities. With this group having been mollified, this may have given Government HE policy actors a greater confidence to assert the true intentions of the White Paper, safe in the knowledge that the most powerful of stakeholders in the field would not object further.

Government also needed to use a discourse fit for the next stage of the policy cycle. Policy cycles are seldom as clean a process of one stage finishing and another beginning, yet a White Paper represents the stage in UK politics where concrete proposals are presented to be translated into legislation for approval by the legislature. It is not the purpose of this thesis to explore this next stage. In order to understand the discourse of the White Paper, however, it must also be considered that the White Paper is a piece of policy discourse at beginning of another policy dialectic (within the legislature) as well as at the conclusion of another (with stakeholders within the field). Whilst the support of Members of the House of Commons can be secured through 'whipping' (political parties requiring MPs to support the voting preferences of the party they are a member of) discourse that speaks to the values and logics of the Government's MPs will it much easier to secure a majority. Thus, there may be some influence over the discourse, policy intent and framing of the White Paper that prepares to influence and motivate Conservative MPs in support, in the same way as the Green Paper was designed to exert power over HE policy stakeholders. If those MPs were motivated by the free market principles, this might provide some further explanation for the change in the White Paper's discourse.

How was the policy of the White Paper formulated?

The analysis of the policy process from consultation to White Paper proposals leaves the reader without a clear idea of how policy was formulated. The 'visible' process of inviting stakeholders to shape, with Government, loosely thought through Green Paper proposals into firm White Paper proposals, does not seem to have been the way that policy was formulated in this case. It leaves the student of policy left with the question 'So how is policy made?'. This will be addressed in the concluding chapter.

Chapter VIII: Discussions and Conclusions

Introduction

Previous chapters have defined concepts, context, methodology and methods, and have applied concepts and methods to the analysis of the Green Paper (BIS, 2015), of stakeholder Responses, (Universities-UK, 2015; GuildHE, 2016; MillionPlus, 2016; RussellGroup, 2016; UniversityAlliance, 2016) and of the White Paper. Insights have been identified throughout this thesis and incremental additions have been made to both the research methodology and the theories of policy development as they arose through the analyses of the discourse. After reprising the main findings from the three empirically-focused chapters, this concluding chapter seeks to return to the introduction to the thesis – to the research questions set for this study and to the goals of making three types of academic contribution: to the methodology of researching policy; to the practice of how to influence policy; and to the theories of policy formulation and decision-making. In each of the following three sections, attempts are made to synthesise the findings from the research and propose further extensions to the methodology of policy research; to the effective practice of policy discourse dialectics; and to the theory of policy formulation and decision-making respectively. It concludes with a forward look at where research might go next so that it becomes possible to satisfactorily answer the question ‘How is policy developed?’

Findings from the analysis of the Green Paper, Stakeholder responses and White Paper in Context

An important dimension of the research methodology, to both Fairclough and Bourdieu, was the consideration of the historical context of the setting within which the research is being conducted. What was the important pre-history to the Green Paper that helps to understand the reasons for the policy proposals and the chances of their success. Chapter IV thus described the preceding 30 years as the extension of new public management (NPM) techniques in the public sector in general and HE in particular, alongside privatisation in a range of sectors, though not in HE. It raised the question of whether the HE Green Paper represented the end of NPM or an evolution of it. It showed that in the field of English HE policy, the NPM consensus was under stress and concluded that by 2015 had reached a point of being primed for radical policy change. A point where many different stakeholders within the field were calling for significant shift in policy, even if there was little consensus over the direction and outcomes for that shift. It was argued that this condition provided fertile ground for an ideologically-driven Conservative Government to seek to effect the final, often-unrealised, goal of the neo-liberal project – the extension of private profit-making to the field of education - higher education.

A detailed study of the discourse in each of the three empirical chapters then produced insights in relation to the discourse of policy actors and the ways that a significant, radical, new HE policy was shaped and influenced. The recognition that the policy debate took an argumentative form (Fischer, Frank and Gottweis, 2013) aided in focusing attention on the different 'policy actors' involved in the 'argument' and the power dialectic between them: Government made proposals in the Green Paper, stakeholders responded with feedback and critique, Government considered their arguments and responded with the White Paper that finalised its decisions over the proposals presented in the Green Paper.

It also provided three different 'moments' within which to study the discourse of policy actors: as Government policy actor seeking to introduce new ideas and proposals, as non-Governmental lobby organisations seeking to challenge or support those policy ideas, introduce new ideas, and influence the ideas in formulation that would become cemented as policy decisions and documented in the White Paper; and thirdly as Government, having received all stakeholder perspectives, setting out the policy ideas that will be adopted as policy decisions that would then be prepared for legislative debate in the Houses of Parliament before their enactment into law. In the policy studies literature, in staged conceptualisation of the policy process, this sequence of events represents the policy formulation to policy decision stages of a policy cycle, with the notion of a 'policy cycle' engaged with critically as a 'useful heuristic archetype', not 'the sole lens through which to view and organise the field' (Weible and Sabatier, 2017, p4)

In the Green Paper, the CDA analysis revealed extensive use of what Fairclough identifies as 'discourse technologies' designed to exert power over the reader. Most significantly, it showed three things: firstly, how a consultation exercise is a form of 'interactional control' that manipulates the responses of stakeholders to some considerable degree. Secondly, it showed which aspects of the Green Paper were of most significance to Government. It revealed this through the forms of argumentation used, the modality of the verbs, the inter-discursive and inter-textual references, the connectives, the way virtue-signalling was deployed extensively, and the words used and the meanings ascribed to them. Together, these critical discourse analysis categories revealed in the subtext that which was not seen through a simple reading of the surface text.

Applying CDA also led to the identification of a new type of inter-discursivity practised in policy discourse that was used to compensate where the *logos* of the policy argument was weak. This new inter-discursivity type was entitled quasi-academic discourse – whereby the form of academic referencing of other literature to support an argument was used even where those sources did not support the policy argument in question. A second form of inter-discursive practise was also identified – 'higher power' referencing – or the quoting of individuals or organisations with elite power in supra-ordinate fields in support of the policy argument. Finally, the detailed analysis of the text also revealed a number of potential new discourse technologies, that appeared to present particular forms of discourse used in particular circumstances. These were 'simplification', 'tangentiality', 'temporality', 'level-shifting' and 'power discourse'.

The following chapter applied the Fairclough typology to a new set of texts, produced by five different kinds of stakeholder organisations representing different groupings of HE institutions. It also tested the provisional new discourse categories of Simplification, Tangentiality, Level-shifting, Temporality, and Power Discourse, to assess their continued validity as analytical categories and examined the chronology of contributions to the policy argument to assess the significance of the timing of utterances from different policy actor in the development of the argument through to its conclusion. The chapter provided an analysis of stakeholder responses and found a variety of different approaches to influencing Government policy, revealed again through Fairclough's original categories and the new categories identified that extended the Fairclough model. Of greatest significance was stakeholders' use of power discourse that revealed, through the high density of discourse technologies used in single paragraphs or sections, the topics the stakeholders were most concerned with. The Fairclough typology continued to identify variations in the sub-texts, signalling attempts to influence readers and revealing factors of greater importance to the writers. The chapter also found apparent variations of actor competence – on their ability to use discourse powerfully to the same extent, to consider as a factor in understanding the reasons why policy actors use certain discourse in certain situations. Finally, it found that certain discourse technologies common in the Government actor's Green Paper, were found to only a limited extent in stakeholder responses, introducing the possibility that discourse technologies in policy should be considered as situationally specific.

The final chapter analysed the White Paper. Here the discourse analysis revealed both the continuing validity of the Fairclough categories of discourse technologies but also the value of the new terms introduced following the Green Paper analysis, including the referencing of 'higher powers' and the use of 'quasi-academic' discourse, that was equally as prevalent as in the Green Paper. The chapter was also seeking to identify whether the stakeholders' attempts to influence the policy decisions, those codified in the White Paper, had been successful, and to see also if any of the discourse of the stakeholders had influenced the discourse used by Government – whether they had been influential either in the substance of the policy decisions or the sub-text of the discourse framing the proposals in the sub-text. It found little influence. Finally, it returned to the question of chronology of policy utterances in the development of the policy argument. Whilst it found little significance in the policy moment studied for this thesis, this was because stakeholder policy actors had all published their policy consultation responses almost simultaneously, towards the end of the consultation period. It revealed that the existence of a formal consultation period represented a form of interactional control by Government over the stakeholder policy actors. Government might have considered alternative formats for consultation, such as encouraging early contributions, if the intention had been to facilitate genuine debate between multiple stakeholders to inform policy decisions.

This concluding chapter goes on to draw insights and proposals in three domains from these three sets of detailed discourse analysis: methodologies for researching policy, discourse practices to influence policy, and policy theory in order to better

understand policy. The implications for further research and practice arising from this thesis are then proposed.

Researching Policy Formulation and Decision-making

There is a significant international body of literature researching the processes by which public policy in general is made, from inception through to evaluation and termination (Fischer, Frank and Miller (2006))(Sabatier, 2007; Gourgues and Fischer, 2013; Carirney and Heikkila, 2014; Bacchi, 2016; Peters and Zittoun, 2016).

Much of the literature of how policy is made adopts a critical orientation (Jessop, 2010; Fairclough, N., 2013; Hyatt, 2013; Dubois, 2015; Durnov et al., 2015; Bacchi, 2016; Fischer, Frank, 2016), and different approaches have been adopted, from the discursive and argumentative models (Fischer, Frank and Forester, 1993; Fischer, Frank, 2003; Prior, Hughes and Peckham, 2012; Fischer, Frank and Gottweis, 2013; Leipold, 2017), to the adaption of the 'garbage can model' of organisational choice (Cohen, March and Olsen, 1972), to create an enduring model of explaining how policy is made in Kingdon's Multiple Streams Approach (Kingdon, 2014).

Kingdon's research itself spawned a significant body of citations and further adaptations of its notion of the combination of three streams – problems, policies and politics (Cairney, Paul, 2016; Leeuw, Hoeijmakers and Peters, 2016; Winkel, 2016), and the presence of 'policy entrepreneurs' that facilitate it (Cairney, Paul, 2018; Reardon, 2018; Mintrom, 2019; Cairney, Paul, 2021).

A sub-field of policy analysis has been developed in relation to higher education policy in particular which has sought to explain, on both a country specific and on an international basis, the reasons for the evolution of HE policy (Trowler, 1998; The Society for Research into Higher and Trowler, 2002; Trowler, 2003; Anon., 2006; Ferlie, Musselin and Andresani, 2008; Badat, 2009; Chapleo and Simms, 2010; Gallacher and Raffe, 2012; Filippakou and Tapper, 2015; Naidoo and Williams, 2015; Ball, 2016; Filippakou, 2016; Bagshaw and McVitty, 2019)

In contributing to this body of knowledge, this thesis has attempted to understand a particular stage of the public policy process – from policy formulation to policy decision-making (Jann and Wegrich, 2007; Sidney, 2007). This is the ideational stage of a policy: from public sharing of a set of policy ideas formulated into in a Green Paper for publication, to the commitment by Government to a definitive set of those ideas in a White Paper (the policy decisions), which is then taken forward to legislation. It has done this through the application of two complementary sets of theories.

The first theory to be applied is Norman Fairclough's Three-Dimensional Model of Critical Discourse Analysis (Fairclough, N., 1992a; Fairclough, N., 1995; Chouliaraki, L. and Fairclough, 1999; Fairclough, N., 2010), where the analysis of text represents dimension one, the discursive practices surrounding its production, distribution and consumption represent dimension two, and the social-cultural practices, both institutional, societal and situational, represent dimension three.

The second body of theory to be applied is Pierre Bourdieu's political sociology and analytical tools that facilitate analysis of the dynamics of power within society: concepts of field, field hierarchies, habitus, symbolic violence and field doxa as

methodological frames (Bourdieu, 1990b, 1991; Bourdieu and Eagleton, 1992; Bourdieu, 2010, 2013).

The research question asked is 'How can CDA be used to understand the process of policy development?'. In the course of the research the established methodology was augmented through additional concepts in relation to the analysis of the discourse itself. These concepts were then applied in subsequent texts and analysed to establish whether they possessed explanatory value over the original Three-Dimensional Model.

The conclusion from this study is that CDA and Bourdieusian analysis can and should be used to understand the process of policymaking.

The application of the methodology revealed findings about policy discourse, policy actors, policy communities and their practices, and the influence of wider events, actors and conditions upon policymaking. These are summarised below.

Policy discourse

Overall, the categories of 'discourse technologies' applied to policy (Locke, 2004) revealed how different types of writing exercise power, to attempt to influence others, and appeared to be applied consistently in accordance with the proposed approach identified by Fairclough. The use of the discursive forms of evidence-based argumentation, of the *logos*, *pathos* and *ethos* of winning a policy argument (Aristotle, 2004) were also evident.

The critical focus on the discourse linguistics, as opposed to the messages in the surface text, was particularly notable in that it revealed some surprising findings. The power of discourse form was such that policy actors did not necessarily continue through with the substance, or *logos* of a policy argument. The discourse form was seen as sufficient as the vehicle for the argument. Where it might have been expected that a policy argument would be put forward that was supported by referenced sources of evidence and research, academic referencing often did not support the arguments made. On other occasions, ideas, whilst organised as if they represented a logically-building case, were, in reality, a series of separate points unrelated to each other. Blinded by the power of the normative discourse form, many respondents did not notice (or were too polite to mention) it in their consultation responses.

The analytical tools provided by Fairclough's typology of discourse technologies (Fairclough, N., 1992a; Locke, 2004) and insights of the CDA model about the 'cohesion' of discourse in a text, revealed the way that the Teaching Excellence Framework and value-oriented sections of the Green Paper were used to divert audiences from the radical elements of the proposals. The balance of discourse produced in stakeholder responses pointed to its success in that respondents wrote significantly more about the former elements in contrast to the more radical and economically consequential latter sections. This demonstrated how through 'symbolic violence' actors could 'misrecognise' the financial harm (or 'economic violence') being done to them (Bourdieu and Wacquant, 1992; Bourdieu, 2013). It showed an understanding, either conscious or sub-conscious, of the interests, ethos and norms of the field that enabled it to manipulate responses from organisations representing established universities which was mild in its opposition to those

policy elements arguably most damaging to its interests . With that opposition suitably mollified, an ideologically driven Government was emboldened to move English HE from an era of New Public Management to 'HE Privatisation', where the right to provide publicly subsidised higher education and even to be called a 'University' was gifted to private, profit-making businesses of any country, for the first time.

Finally, when policy texts are read with the CDA typology of discourse technologies in mind, it was evident that certain paragraphs of text contained a higher density of discourse technologies, and as such revealed themselves as more powerful, or designed to assert power. These sections were not present in every section of the policy texts studied, suggesting that the sections may be of particular significance to the author, either revealing, overtly or sub-consciously, areas of particular personal priority, elements core to their argument or ethos, or the particular desire to exert power in respect to particular points. For future research, these sections of text with high density of discourse technologies, or sections of 'power discourse', could then be identified, categorised and used to analyse similar policy documents for consistency or divergence. It facilitates, in the researcher, a critical questioning about motives, meaning and priorities of the writers, which can inform a deeper analysis of how policy is made. It also directs the researcher towards closer examination of particular sections of discourse to prioritise for interrogation in order to understand policymaking.

Policy actors

Fairclough's model was also instructive in revealing that the use of discourse technologies is a skill, and that some policy actors were not able to write as powerfully and as influentially as others. Through enabling the researcher to identify more and less powerful discourse, Fairclough's CDA facilitates insight into why different organisations and individuals might be influential within a field. It can also be used to generate assumptions as to which views, on the basis of discourse power, would be likely to convince people in arguments and which were not, which could be examined empirically. It was evident from the study that governmental policy actors were particularly adept in the usage of discourse technologies and hence the production of powerful, influential discourse. The less well-resourced, and perhaps less skilled, lobby organisations applied some aspects of the craft but were on the whole less adept.

The critical dimension to the CDA model and the appreciation of the importance of the discourse producer operating within a context of discourse practices within a field, was also important. It meant it was possible to both identify discourse intended to be particularly influential, and also to prompt questions of why those aspects were emphasised: why they were important to the writer, and to trace the patterns of policy ideation and articulation in text. The approach employed in this thesis thus adds value to Kingdon's concepts of 'policy entrepreneurs' (Kingdon, 2014), a group of actors which other researchers (Leeuw, Hoeijmakers and Peters, 2016) have found are typically more active in the ideational policy stream of policy formulation, requiring as it does a 'great perspicacity with words' (p196).

Policy communities and their practices

The CDA model was also valuable in understanding the 'common sense' practices of policy communities and how those 'taken-for-granted' perspectives shaped the way that policy was developed and defined the issues that became matters for policy consideration. It revealed how the form of public stakeholder policy consultations exercises power in itself. It exerts interactional control over the views of stakeholders by directing or misdirecting their attentions to particular questions, organised into particular sections, with particular titles.

CDA also revealed questions to ask about the unwritten rules governing policy networks and practices – the habitus of the field of English HE policymaking – which was insightful in showing how thirty-years of experience of new public management as the main model for practicing public policy had enculturated the policy community to leap energetically into consideration of elements of the policy proposals that were of marginal significance to the interests of the stakeholders themselves. This was symbolic power concealing the exercise of economic power (Bourdieu, 2010). Bourdieu's concept of the field and habitus (ibid.) also showed that policy discourse is an elite activity, practiced by professionals, or 'policy entrepreneurs'. There may have notionally been the opportunity for any member of society to participate, but responses were expected in a particular discursive form. Those not equipped with the skills of powerful discourse production were easily ignored.

Events and actors beyond the field and insights into how they might influence discourse

Both Bourdieu and Fairclough's approaches encourage the researcher to look wider at the influences over policy writing, beyond the text itself, beyond the doxa of the English HE policy field, and even beyond those insights that might be gained from interviews with the policy actors themselves. It creates a critical faculty in the researcher. This enables them to identify within policy discourse elements that may be the result of extra-field dimensions or socio-cultural structuring of action and thought. They can then relate that back to the policy discourse itself, in explanation of why certain policy comes to be produced.

More specifically, in this study, the Fairclough methodology showed how activity in one field is influenced by that in another. It showed the structuring of power and hierarchies of political and policy fields. In this structuring, deference is shown to other higher levels of Government (The Treasury and Prime Minister's Office particularly), to other individuals with status in society (commissioned to write 'independent' reports). It also showed how the status of these bodies or people with higher power was used vicariously, to support the process of convincing readers of the correctness of the policy arguments put forward in Government policy proposals – a feature of Government policy discourse demonstrated in both the Green and White Papers.

The explanatory power of the approach used in this thesis derives from its consideration of three dimensions of discourse analysis: close examination of text; consideration of the practices of discourse production and critical examination of the socio-cultural conditions of that discourse. In this thesis, the close examination

has been of policy texts written by actors in the field of English HE policymaking. There has been a close attention to the doxa of the field of HE policy consultations and the apparently public and transparent process that actors perform within. It is when the degree of influence from 'beyond the field' is analysed, the 'third-dimension' of Fairclough's model, that a more complete understanding is established of how and why policy developed as it did. Fairclough advised that it is necessary to alternate between study of the discourse, the conditions of its production and the wider socio-cultural practices and context that it sits within. The consideration of events and actors 'beyond the field' in this study has validated the relevance of this approach. It has also reinforced the value of Bourdieu in understanding how power in society is applied and sustained, as a set of explanatory tools for use at this wider socio-cultural level.

Understanding why events do not occur, as well as why they do
The Fairclough model proposes consideration of the historical events that led up to the discourse, or policy moment, to be studied. It suggests that these previous events, their texts, their discourse, and their socio-cultural power dynamics, frame the parameters of what is possible or likely in the moment to be studied. This temporal consideration also prompts the researcher to look forward to the events after the 'moment' to be studied, in order to fully understand its significance and the reasons for its occurrence. This helps researchers to answer the question 'why did an event not happen?' as well as 'why did this occur?'.

This thesis explored the rise of New Public Management in public policy in general (Hood, 2015) and its particular application in Higher Education (Broucker and De Wit, 2015) as context to the analysis of the Green Paper, which proposed privatisation of English higher education, an act described here as 'symbolic violence' in which those being oppressed, the established universities in England, acquiesced to their own subordination. Beliefs about the logic of market mechanisms, measurement and competition had been sufficiently sedimented into the beliefs and dispositions of policy actors that had spent their working lives within the NPM habitus, that they accepted the extension of this approach to embody private for-profit competitors, with minimal resistance. The superordinate field dynamics in the fields of global economy and UK government policy and ideology, (precipitated by the global financial crisis of 2008 and the UK Conservative Government's ideological exploitation of events to create a narrative of austerity as the only 'common sense' response) further illustrate the value of the Fairclough-Bourdieu approach. It showed that privatisation of HE in England may well have signalled a major, radical shift in the field, yet the 'revolution' was met with little opposition – difficult to understand without the insights of Bourdieu and Fairclough.

The value of the augmentations to the 'discourse technologies' typology
In addition to the CDA model and Bourdieu, four principal categories of analysis, or 'discourse technologies', were identified as having been used to exert power over the reader. These categories of discourse technologies were developed as part of this research and are recommended for consideration as augmentations to the Fairclough model: The use of simplicity; tangentiality; level-shifting; temporality; and the concept of 'power discourse' :

Simplification – the communication of any change as a simplification of previous complexity **and** the presentation of policy in very short, simple messages that provide heuristics for understanding policy and apparently reducing the complexities of the world and are thus attractive.

Tangentiality – the presentation of a significant policy proposal away from the ‘critical path’ of a narrative policy argument, such as by describing it in a single point as part of a bulleted list, in order to divert attention from it whilst being able to say that consultation responses were invited on it. Secondly, at the level of discourse structure and inter-textual relationships, the separation of policy proposals and decisions from other significant aspects of the policy development, such as the synthesis of stakeholder consultation responses or parallel consultations about ‘technical’ matters.

Level-shifting - a shift in the ‘level’ of the policy discourse, for example from operational implementation to concepts or vice versa, used to add weight to the power of the discourse deployed or to divert from a weakness of policy argument.

Temporality – reference to time in policy discourse, either to justify a change by describing the previous situation as anachronistic, by projecting a view of the future that is optimistic and long-sighted, or by describing milestones of policy implementation in order to build confidence that the policy proposer has a clear plan for how to enact the policy. It is also used to show lineage to policy proposals and to emphasise continuity, playing on default preferences for maintenance of the status quo amongst many in the consulted policy community.

Power discourse – the combination of a number of discourse technologies within a single passage, producing high density and powerful, influential writing and revealing aspects of policy that the writer is particularly concerned to see succeed.

Each of the above was found to be used and apparently useful in the Green Paper production and were also in evidence in the better written of the stakeholder responses. It is argued from the evidence of this study, that they warrant consideration as augmentations to the Three Dimensional CDA Model as it is applied to policy discourse.

Two specific forms of inter-discursivity found in policy discourse were also notable and would be recommended as analytical properties for applying CDA to policy discourse. The first was the referencing of ‘higher powers’, or the practice of making connections, inter-textual or discursual, between the policy argument being put forward and other actors recognised as possessing forms of elite power in other fields. The second was the deployment of what is described as ‘pseudo-academic’ discourse. This is the use of the academic form of discourse where the sources referenced do not support the substance of the policy argument in the main text. This is worthy of more detailed exploration in further studies as it may indicate that policy has been decided in advance of evidence being gathered.

Potentials and limitations of the model for researching policy formulation and decision-making

Whilst the application of the augmented model did bring insights as a methodology for researching policy formulation and decision-making, it also revealed how little

would be able to be seen of the forces influencing policy development if the method were one of simply studying the surface texts. Even with a critical linguistic approach, studying the text only, it would be possible to see only attempts to exert power and influence, yet one could not trace the reasons for changes to policy, how ideas are developed and who has had influence over the shaping of them.

This is where the two other dimensions of Fairclough's model come into their own – the meso-level of discourse practice – the production, distribution and consumption of discourse and the macro-level socio-cultural conditions of production, both social, situational and institutional. Taken in isolation the micro-level textual analysis and discursal exchanges between policy actors explain little. Those texts and exchanges must be seen as part of well-established rituals of policy conception, consultation and resolution. They must also be considered in terms of the changes to Government policy that impacts the economic, social and cultural power relations across this and other fields. This is where Bourdieu's concepts, in parallel with CDA, add a dimension. They help to understand the reasons why actors may behave in particular ways. They help to anticipate potential intra- and inter-field dynamics. They may also reveal to others the subconscious rules of engagement that may have governed their own practices. These subconscious constraints may have resulted in them taking a less critical approach to the issues under consideration and to the 'social games' they have involve themselves in.

This is not to say that the Fairclough-Bourdieu model provides a perfect understanding of policy formulation and decision-making. Just as this thesis has criticised other policy theories for being insufficiently critical and not looking at the power relations shaping which questions are asked and which are not, this thesis' Fairclough-Bourdieu approach itself still requires further augmentation to create a fully satisfactory and comprehensive analysis of how policy decision-making happens.

The model has illuminated the effective and agentic discursive practices of professional policy actors, revealing underlying ideologies and power relations, showing where normalised habitus has left certain questions unasked and forced responses and behaviours through acceptance of the doxa of the field. It has provided insights into where to look for the structuring structures and exercise of power between actors in different fields, revealing, through close analysis of the discourse, where actors are seeking to exercise power. It has also provided the conceptual tools to identify public rituals designed to legitimise decision-making and give the appearance of pluralistic, stakeholder-informed decision-making. It has also revealed, however, that the formal policymaking processes and the public discursal exchanges between stakeholders (that are presented by Government as the way policy is made) explain little of how policy formulation is actually made. As these have formed a major part of this thesis, this points to the need for further additional research to examine the interactions and exercises of power that are not seen in the official policy consultation process.

Study of text alone (what Fairclough might describe as a single-dimensional model) reveals only a partial picture about how policy is made. This study has revealed that the most significant influences appear to be beyond the formal process. The Fairclough-Bourdieu approach's critical ontology equips the researcher to be alert

to the signs that power may be being exercised elsewhere but also gives direction as to where to look in further research of the second and third dimensions of Fairclough's model and to examine the unexplored doxa of a field, the way practice in that field may be influenced by other fields and that asymmetries of power may be sedimented into relationships over time, such that actors will not necessarily express concern about such relationships, due to their lack of conscious agency.

The loci of fruitful further research will be shaped by the specific context for each policy under consideration. For the current study, it is proposed that the following might complement the research completed to date:

- a. the analysis of discourse on textual platforms not studied (such as social media communities of policy actors);
- b. the examination of interactions within supra-level fields of elite power – cabinet government, the socialising of influential individuals, and the messages in the media they consume;
- c. the study of dispositions and utterances (verbal and written) of civil servants, ministers and other policy actors, and an exploration of the experiences that have shaped their professional lives - lives lived in the habitus of the field, where actors apply field logics over time, which serves to evolve policy ideation in consistent directions when faced with particular situations.

Other research methods could be applied to complement the discourse analysis used in this thesis. These could include:

- a. specialist techniques for interviewing elites (Stephens, 2007; Harvey, 2011; Wicker, 2014);
- b. quantitative corpus linguistics that use machine learning to facilitate the analysis of large quantities of text and the automatic transcription of speech into texts that facilitates machine-analysis (Kennedy, G., 1998; Gries, 2009; Hôte, 2014; Weisser, 2016); and
- c. analysis using social network theory to systematically map the connections and their relative strengths between actors in a range of fields (Knoke, 1905; Carolan, 2013; Orsmond, Merry and Callaghan, 2013; Scott, 2013; Lee, 2014; Missaoui, 2014; Reardon, 2018).

The above points at a further important issue in the conclusion to this thesis, which is that, as Bucholtz notes (2001), a particular academic study of discourse, such as this one, cannot address in one study the totality of research perspectives that could fruitfully be taken. Each piece of research does not exist in a vacuum but contributes, with other research, to the stock of knowledge, developing an increasingly sophisticated understanding of the object of study. Social inquiry is 'a social enterprise' undertaken by a community of scholars where, through openness about the methods of inquiry, other members of the community are able to challenge, amend and build on the work of others. A single study may present research questions and theoretical perspectives. Through further investigation and application, these may gain in salience, prompt further complementary research studies and become established within the research community as possessing greater explanatory power. As King et al. argue 'Our work need not be beyond

criticism to make an important contribution – to the description of a problem or its conceptualisation, to theory or to the evaluation of theory.’(1994, p9)

Influencing Policy Formulation and Decision-making

This study has revealed much about how policy actors can use discourse technologies in order to exert power, suggesting what techniques they should use, including the newly identified technique of ‘power discourse’. Many policy actors did not use these techniques however, although through documenting and explaining them this study facilitates the process by which these things can be learned. The application of a theoretical frame to practice with which policy actors may be familiar, is also important. It aids their critical understanding of the wider structures of power within their field of operation, helps them understand the social production of discourse and policy, and to see the sociocultural practices of the field, located within a hierarchy of fields.

In the production of policy texts, certain forms of discourse can be powerful, and as such very useful to the policy professional whose job is concerned with seeing their policy ideas and proposals become enacted in policy and then implemented. The Fairclough typology of discourse technologies, summarised in the table at appendix I, is a sensible starting point for those seeking to produce powerful discourse. Whilst not all described types were in evidence in the texts studied, this typology has been extensively applied and tested by Fairclough and others in the use of the model. In this study of policy discourse there were a small number of other techniques which can be applied in working with the model: the use of temporality; tangentiality; level-shifting; simplification; and most importantly the use of passages of ‘power discourse’ where multiple discourse technologies from the augmented Three Dimensional Model are applied. For the policy actor seeking to develop the power of their discourse technique, they would warrant study and application.

It is also not just discourse in text that the successful policy actor must apply. This study has demonstrated the value of engaging with the full CDA Three-Dimensional Model and consideration of the processes of discourse production, distribution and consumption, packaging and contextualising their own written discourse for maximum effect in interaction with others. Engagement with this part of the model aids the production of discourse in text by capitalising on inter-discursive and inter-textual connections with power bases (Fairclough, N., 1992b), guiding the relationships that are fostered in order to see their policy discourse win out. It also alerts the policy actor to be aware that if they are not conscious of how others are attempting to use discourse sub-texts to exert power over them, then their thoughts and actions are being sub-consciously conditioned in ways they have not identified for themselves.

Attention to the micro- and meso-level practices of the three-Dimensional Model are essential but it may still leave policy actors frustrated when the process of policy development does still not appear visible. Here is where Bourdieu is valuable to the policy actor- to consider, and be alert in looking out for, the fields and their interactions and the notion of habitus of a field as unwritten codes of behaviour and thought. Once the policy actor has recognised that they themselves operate

within this system that structures their behaviours, thoughts and actions, they need then to explore their own sub-conscious and critically investigate how they have been influenced by the habituses of the fields they inhabit. Whatever their policy goals, this awareness will enlarge their potential parameters as creative, effective, agentic policy actors, reinforcing their position as influencers not as those who are influenced.

Finally, changing practices for influencing policy development is not easy. Few will read a thesis like this and many may find the theories and concepts of both Fairclough and Bourdieu inaccessible. This thesis aims to help identify how to influence policy development rather than just write about it. Ideas need to be portrayed in discursal forms more accessible to the practitioner reader, even a professional policy actor one. Thus, an attempt has been made to write a guide for policy wonks on how to apply the lessons of this thesis for policy discourse. The guide, attached at appendix V, seeks to adopt the discursal form common in professional guides to self-improvement. It aims to provide a pithy, accessible, and thought provoking, if light-hearted, analysis of considerations for the policy wonk bent on improving their policy discourse. Hopefully the short guide will whet their appetites and encourage them to read Fairclough and Bourdieu, but at all times to maintain their criticality, using the tools of CDA to understand and shape their own practice as policy actors.

Towards an Extended Understanding of Policy Formulation and Decision-making

This study began by reviewing the leading theories of public policy analysis and found each to be somewhat limited in their explanation of how policy is made. The techno-empiricist model of Laswell appeared naïve in its assumptions of the motivations and goals of the individuals involved in development of policy and silent on the structuring social, economic, and cultural contexts that shaped which topics become policy issues on the agenda of governmental or stakeholder policy actors. Kingdon's multiple stream model (Kingdon, 2014) had some attractions, adapting the 'garbage can model' of organisational choice (Cohen, March and Olsen, 1972). It incorporated concepts of agency with that of facilitating 'policy entrepreneurs'. It identified those issues which become 'political' and liable to be addressed, and distinguished them from those that could be identified as 'policy' which were not addressed. It also addressed the temporal consideration of 'policy moments' when each of the streams: issue, politics and policy solution mixed by a policy entrepreneur, produced the magic that led to policy going forward. Yet this still did not provide much explanatory power in identifying when and why conditions would align, nor did it explain who was responsible for making policy happen.

Latterly, the 'argumentative turn' for policy theory (Fischer, Frank and Forester, 1993; Fischer, Frank and Gottweis, 2013) proposed that argument between different stakeholders of different levels of power and influence produces policy, yet its analysis rarely charted the ebb and flow of the argument itself and as such failed to deal with any particular precision with explaining how arguments were won, what were the conditions of the battle and what weapons were most

effective. In focusing on merits of policy arguments in the abstract, it also lost the significance of the techno-empiricist notion of policy as a linear process moving through stages – important in the twenty-first century, not because it represents the reality of policymaking, but because this remains how Government describes the process of policymaking and how many people understand it: the exercise of symbolic power forcing actors to misrecognise the exercise of other forms of power.

Jann & Wegrich (2007) describe the conventional presentation of contemporary 'stage' models of policy processes as typically involving the stages of 'agenda-setting', 'policy formulation', 'decision-making', 'implementation', and 'evaluation', concluding, in some models with 'termination' (Jann and Wegrich, 2007, p43). This thesis has focused on the stage of 'formulation' through to 'decision-making'. It should be noted that the idea of a policy cycle in terms of stages has been criticised for being overly deterministic and linear (Sidney, 2007) or indeed simplistic and inaccurate as a portrayal of what happens in a policy process (Jenkins-Smith and Sabatier, 1994). It has been adopted for this thesis, not because of its power as an analytic tool of how policy processes actually function, but because it is the representation of how policy decision-making is done that Government promotes, through cycles, events and rituals. It is the process's symbolic power that has been the reason for its choice in this thesis.

The thesis has supported other research findings that tracing policymaking through following the progression of policy agendas formulated into proposals and moved through linear stages of democratic and visible debate to reach clear points of decision is not reflected in real-world applications. The notion of a 'cycle' and 'stage' is important as a feature of the habitus that conditions policy actors to commit to the rituals of policy consultation. As Bourdieu describes it giving 'practical expectations or hopes which are constitutive of an *illusio* as investment in a social game...' (Bourdieu, 2000, p209)

The policy theory applied in this study took critical discourse analysis and understandings of the structuring of power relations in fields to reveal who was exerting power over whom and how they did it. It extended the notion of argumentation in introducing the temporal notion of the need to explore the policy argument itself, as an exchange of views leading to a conclusion. If the argument is to be tracked it is necessary to consider the chronological order in which policy idea or dialectic exchange took place, in order to chart the development of influence and gestation and evolution of ideas.

This section seeks to articulate a number of elements that are proposed as extensions to theories of policy formulation and decision-making and to critical discourse analysis, identified following reflection on the details of the creation of the 2016 HE White Paper. Part of the reflection on the study, and the genesis for a number of the proposed extensions arise from observations of the limitations of this study. Fairclough and Bourdieu both encourage a critical disposition that places significance on that which is not written or observed. Thus, it is perhaps unsurprising that insights that are subsequently put forward to extend policy theories, arise from that which was not observed in this primary research as much as from that which was observed.

The Fairclough-Bourdieu Framework – combining the insights of Fairclough and Bourdieu

In order to provide even an even greater understanding of policy formulation and decision-making, an extended approach to policy analysis, combining the concepts and methodologies of Fairclough and Bourdieu is proposed. This will be described as the Fairclough-Bourdieu Framework for Policy Analysis. It has eighteen identified precepts, which are set out below. The definition and application of this proposed framework for analysis has implications for two existing theories. First, the Framework emphasises the agency of policy actors and communities and brings new perspectives on analysing each of the three dimensions within Fairclough's Model. Second, through its revealing of hidden power exerted through discourse, socio-cultural context and the influence of field and habitus, it brings a new dimension to Kingdon's Multiple Streams Approach. An attempt is made to reveal the factors which are necessary to take into consideration in order to gain a fuller understanding of how policy is made, through applying the Fairclough-Bourdieu Framework and Multiple Streams Approach in combination. The approach selects spheres of influence, or loci of power dialectics, and proposes an order of analysis, as Fairclough does with the Three Dimensional Model (Fairclough, N., 1992a), to facilitate a focus on elements (discourse, actors, situations and contexts) put forward as having greatest explanatory power.

It is argued that policy development occurs at three levels: the micro-level text produced by policy actors; the meso-level of the policy community (field) inhabited by a number of policy actors; and the macro-level of the social, economic and cultural environment that structures and conditions behaviour and thought, and includes a number of power-bases, individuals and organisations, operating in different fields, that consciously and unconsciously influence policy development in the field of study. Relations between the levels are fluid and each act on the others. For example, policy discourse gives meaning to actions taken within policy communities, resulting in changes that impact the doxa of the field. Activity in higher level fields can also influence which texts are permitted to be written by policy actors a sub-field. It may also sustain a habitus of that sub-field that encultures policy actors to never think to ask certain policy questions, and thus to never produce policy discourse that could establish meaning and change practice.

Policy development is a social process, a dialectical struggle between opposing actors and their ideas. It is a power struggle that occurs at the level of the text, revealed through Fairclough's discourse technologies (Locke, 2004) which themselves should be extended by the additional 'technologies' of 'power discourse', 'tangentiality', 'simplification', 'level-shifting' and 'temporality' discovered and described within this thesis. It is a power struggle that occurs through the public and the hidden structures and doxa of the field. Those structures and doxa determine who is in the battle, how it is fought, with what weapons. They shape which observers will be present and the connections that actors in the field may have with more powerful actors, in supra-level fields, who may be able to overrule developments in the field itself. It is a power struggle played out in the actions and forces that condition and structure all behaviour and thought at the macro-level of economic, social and cultural power. As play at each level within a

hierarchy of fields impacts on each other level, analysis of the forces shaping policy development can start at any level, as it will be necessary to identify and follow exercises of power between the levels. A critical ontology is required, attuned to the signs at each level of influence over another. The eighteen precepts of the Fairclough-Bourdieu Framework for Policy Analysis are detailed below.

The eighteen precepts of the Fairclough-Bourdieu Framework

1. Policy development cannot be understood without adopting a critical ontology. All actors, including the researcher themselves, exist within and are influenced by the structures of social, economic, cultural and political activity. It is thus necessary to explore not just the actions and utterances of actors but to consider their agency or lack of agency within the context of wider forces that shape their behaviours.
2. Epistemologically, it is necessary to draw inference from that which is not observed as well as that which is. Language is used to create meaning and thus influences notions of what is knowledge, and thus must similarly be approached critically.
3. The study of public policy development at its ideational stage should start with the study of discourse. The end point of this stage is the communication of a set of proposals for action in the form of written discourse in order that those proposals can be progressed to legislative action or implementation. The consideration of proposals at the legislative stage is a new locus of power dialectics and requires its own critical analysis. The actors and the policy discourse are often different from the ideational stage.
4. The process of policy formulation should be understood in the terms that it is publicly presented – typically as representing a particular stage in a linear process from idea to implementation – but with a critical ontology. The exercise of policy influence is messier in chronological terms, but the linear process is an act of symbolic violence that shapes the behaviours of many public actors who are persuaded by the *illusio* that the ‘game’ of formal policy consultation is worth their while to play.
5. Policy discourse is created by policy actors who advocate for particular positions or decisions.
6. Policy actors are typically experts in the development of policy, in possession of particular skills and orientations.
7. Actors must be understood to operate within a policy community, or field, and interactions between members of that community shape actor orientations, alliances, policy goals and discourse.
8. The chronological dates on which utterances of policy discourse are made public by different actors are significant for plotting causal, inter-textual and inter-discursive relationships in the course of argumentation between actors in a policy community.

9. Radical, paradigm-shifting, policy change requires the use of symbolic capital by policy actors in order to secure the necessary support. Without the enablement of this symbolic violence, with calls to cultural indicators, religion, belief, honour or the doxa of the field, other actors with power in the field will react with resistance to the proposals that they recognise as counter to their own interests.
10. Policy actors experience the habitus of a field. Through this they shape and are shaped by the rituals and behaviours dominant in the field.
11. The habitus of the field creates barriers to entry by others and defines acceptable and non-acceptable actor behaviour and discourse in order to be accepted, and influential, within the field. These 'rules of the game' are typically not codified or consciously learned and may be practiced unconsciously by actors who have spent a long time operating within the field. Socialisation within the field reinforces notions of acceptable and effective behaviours and the status of actors within the field.
12. Effective policy actors (or to use Kingdon's term 'policy entrepreneurs') may or may not be conscious of their own skill and deployment of discourse technologies. Thus, it is necessary to research the conditions of discourse production, distribution and consumption and the processes and practices, the doxa, of the field, to understand and predict agentic actor behaviour.
13. Policy actors, as participants within the field, are capable of gaining a consciousness of the doxa of the field, and field hierarchies, of their own dispositions and of the techniques of effective discourse, such that they can consciously learn to be more effective actors – they can learn policy 'entrepreneurship'.
14. Policy actors use discourse technologies in their production of texts that can be understood, (with reference to Fairclough's analytical framework of discourse technologies that should include the additional concepts of 'simplification', 'tangentiality', 'level-shifting', 'temporality' and 'power discourse' as described in this thesis), as more or less effective for exerting power over others.
15. Successful agency as a policy actor should be judged in terms of the ability to secure a particular policy outcome. Sometimes that outcome may involve compromise and cooperation, but these are tactical matters, not matters of strategy. Policy development is concerned with ends, not means, and should be researched as such.
16. Policy formulation and the discourse that articulates both proposals and resistance to them is a locus of power dialectics. It is not a pursuit of objective truth, the 'best' solution to a problem or an articulation of a pluralistic process of stakeholder-mediated compromise as has been variously argued in policy studies since the 1950s (see Jann and Wegrich (2007) for a review of approaches). The actions of those who contribute to policymaking should be understood as more or less successful attempts to exert power over others in pursuit of particular goals.

17. The power and hierarchical position of an actor in the field, and the position of that field in field hierarchies, shape their effectiveness. It is pursued publicly in stages (Jann and Wegrich, 2007) yet there can be messiness in their chronology (ibid.). In its ideational stage, in the formulation of policy, seeing a policy proposal to the stage at which it is accepted as a decision, to be enacted in the next phase is the default purpose of policy actors and the starting point for an understanding of their motivations.
18. Historical and contemporary socio-cultural forces both structure and are structured by the activities within fields and by policy actors and their discourse.

The Fairclough-Bourdieu Framework: Introducing Agency and Relationships into the Three-Dimensional Model

A further theoretical contribution derived from this thesis is proposed as the introduction of agency and relationships into the diagrammatical representation of Fairclough's Three-Dimensional Model. Fairclough's model is often presented diagrammatically (both by Fairclough and others subsequently) as Text at the centre (first dimension), shaped by Discourse Practices (how discourse is produced, distributed and consumed – the second dimension) and both of those encapsulated by the third dimension, the social and cultural practices that text, and the treatment of discourses, take place within and interact with. Few however have represented the actors at each dimension of the model, nor provided insight into how to reveal where agency has been exercised, within the meso- and macro-dimensions of the model, leading to the criticism by some that that the model downplays agency in favour of vague, structural explanations of power. It is argued here that in a theory of policy development built on the CDA model, agency is important and can be identified through systematic exploration of the agents at each level and each field.

As the adaptation of Fairclough's diagram shows below, the locus for potential agentic action, at the level of the policy text, the micro- level, is the policy actor. The policy actor uses discourse technologies to construct discourse with the potential to exert power over others. If the potential for agentic policy actors using manipulative discourse technologies in text is recognised, then it is important to study not just the discourse but the producers of the discourse. The theory proposes that as much as possible should be discovered about the discourse producer – their values, their life and career histories, relationships, discourse abilities, insecurities, behaviours and prior discourse, including an assessment of their previous ability to influence through discourse. At this level it is recommended that their previous output is reviewed, that they are interviewed, and that their social and professional networks mapped to identify their influences.

Understanding Policy actor agency, relationships and influences in the Three-Dimensional Model of CDA

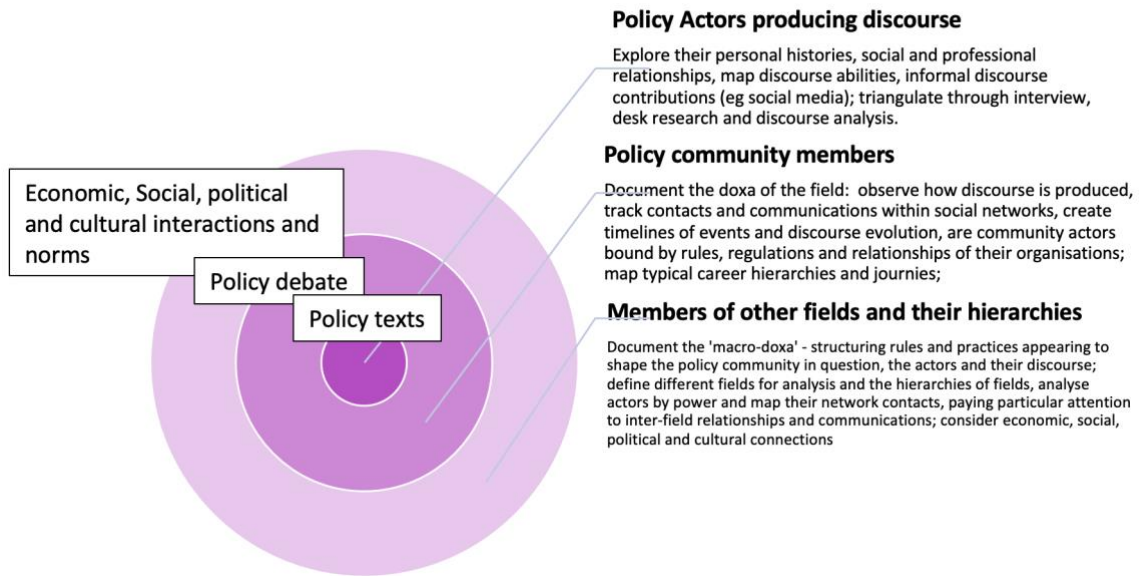


Figure 2.

At the meso-level exist policy communities. The theory proposes adopting Bourdieu here to analyse the habitus of the field, its doxa, its shared unwritten norms, career hierarchies and professional networks, the identification of 'insiders' and 'outsiders', the mapping of layered relationships, organisational affiliations and the rules that govern their behaviours, actions and discourse that they produce. To understand the forces at play in the wider field will require that: 1. the norms of the field are documented; 2. the micro regulations and relationships of the organisations that inhabit the policy community (recognising that many policy actors will be working on behalf of other interests, both formally acknowledged, as with lobby organisations, or informally); 3. the content and communications are tracked on all principal channels used in the field; and 4. the timelines are constructed of events and discourse production so as to track the evolution of policy thought within the community.

Finally, at the macro-level of society, there are multiple power bases and elites in operation; structuring power relationships which shape communities and the discourse produced within them; and field hierarchies that see play at one 'game' in one field significantly influenced by events at wider or different fields. In policy studies it is often not possible to understand the reasons for a policy's success without detailed consideration of this macro-level. Actions to understand policy development at this level would be to: 1. identify historic trends; 2. analyse inter-field relationships and communications; 3. plot the relationships of key individuals and organisations of influence; 4. define the contexts and significant recent events in economic, social and cultural spheres; 5. map the macro-doxa that shape the policy community in question, the actors, and their discourse, so as to reveal those questions that are never asked and the reasons for that.

Integrating the Fairclough-Bourdieu Framework with the Multiple Streams Approach

In this final section an attempt is made to reconcile the eighteen elements of the Fairclough-Bourdieu Framework developed through this thesis, to Kingdon's Multiple Streams Approach (MSA). Kingdon's Approach is widely regarded as one of the most influential in the field, with a significant body of researchers applying the approach, leading to its

continual evolution (Sabatier, 2007, p6). This evolution has seen other researchers attempt to combine policy cycles and multiple streams (Hogan and Howlett, 2015; Mukherjee and Howlett, 2015; Howlett, McConnell and Perl, 2016) as well as multiple streams and policy discourse analysis (Winkel, 2016). As with Fairclough's Three-Dimensional model for CDA, Kingdon's Multiple Streams Approach has frequently been presented diagrammatically, such as in figure three, produced by Jones et al. (Jones, 2016) in their meta-analysis of MSA research.

These diagrams create helpful heuristics for the complexity of relationships and power dynamics at play in policy processes, and through that providing explanatory power to it. In an adaptation of the diagram of the Multiple Streams Approach, the figure below overlays the eighteen elements of the Fairclough-Bourdieu Framework onto the MSA diagram, illustrating how the two theories can be integrated, with a commentary of how this may function provided below the new diagram.

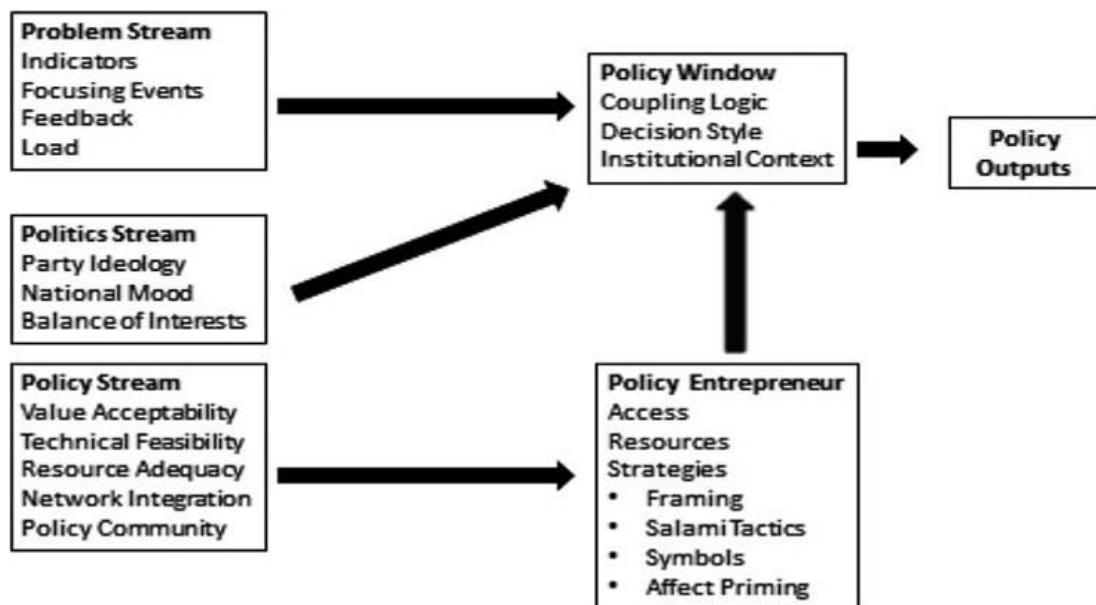


Figure 3. The Multiple Streams Approach

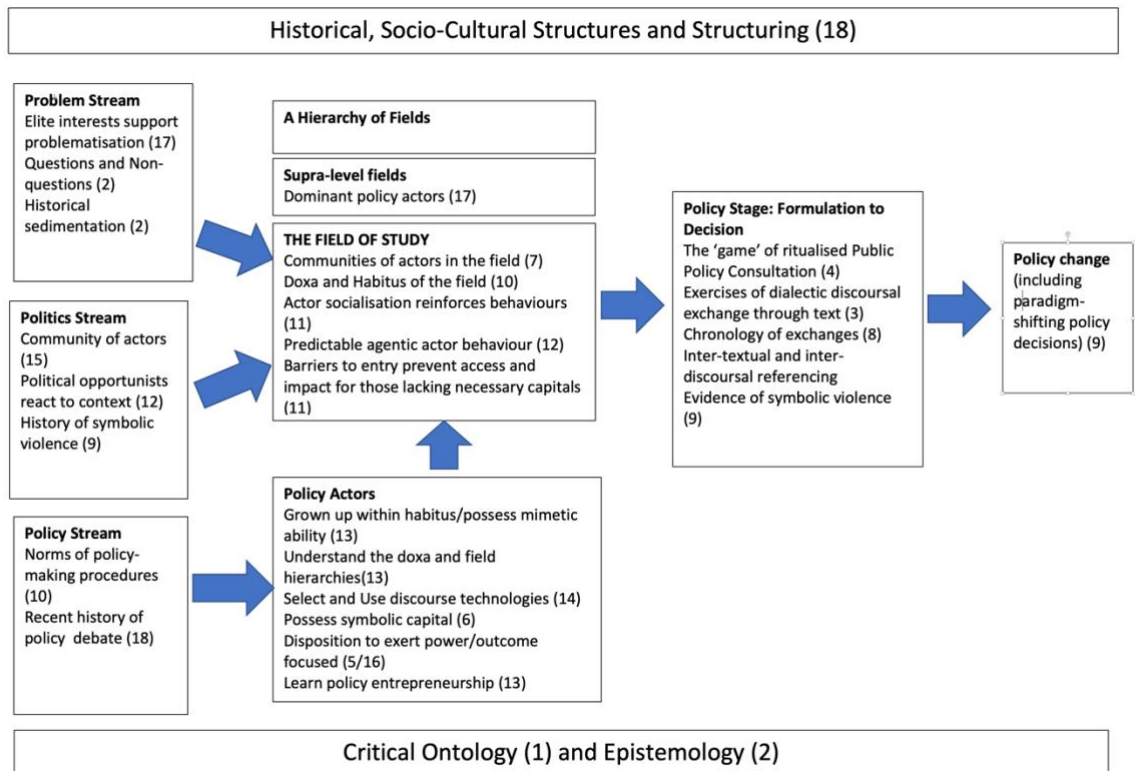


Figure 4: Integrating the Fairclough-Bourdieu Framework for Policy Analysis with the Multiple Streams Approach

In integrating with the concept of multiple streams, the Fairclough-Bourdieu Framework provides insight into how possibilities in the problem, political and policy streams become realities that are then present to be considered within a 'policy window'. The approach starts with the ontological and epistemological perspectives that are critical and questioning towards all observation of what occurs and what does not, taking nothing at face value, as articulated in 'surface texts' but being alert to the power dynamics, overt or subconscious, that might shape events.

In the problem stream, it illustrates how elite interests are important in facilitating or resisting the degree to which issues become problematised – a process that requires consideration not only of questions asked and disregarded, but of those questions that are not asked, encouraging further investigation into why they are not, when in other comparable situations or states, those questions may be problematised. In addressing this it considers the historical sedimentation, through power relationships, of ideas and orientations towards problem-solving and problem identification that might lead to problem selection or absence.

Within the politics stream, it recognises that there is a community of actors who interact and combine to promote political priorities to the fore. In this, political opportunists, who might themselves be regarded as entrepreneurs, exploit events, recent history, circumstance, and popular perception where they see the chance to further their own interests. Those same circumstances often reveal a history of symbolic violence which, when identified, can signal that actors and other stakeholders have previously misrecognised the intentions of other actors and

impact of exercises of other forms of power (such as economic). They may thus be susceptible to similar misrecognition again.

In the Policy Stream, again the recent history of policy evolution has a bearing upon whether a community of actors in a field regard a problem as being something that could be addressed through a policy intervention. The policy community also has established norms in relation to policymaking procedures, which themselves constrain the conceptual limits for policy actors of what policy action might be able to achieve, regardless of the evidence of policy action in other fields or states.

The next element creates a variation to the MSA model in respect to policy entrepreneurs (what in the Fairclough-Bourdieu Framework are described as 'policy actors'). As with MSA, policy actors are identified with particular skills and dispositions, although greater attention is paid to the extent to which they might be effective as agentic policy actors and to the influence of fields, field hierarchies, and the doxa and habitus of those fields. The qualities of policy entrepreneurs are qualified through concepts of the habitus of fields, their understanding of the doxa and habitus of those fields, and the extent of their experience of the habitus, having been part of it or developed the ability to mimic its behaviours.

Whilst minor policy change is possible without the use of symbolic capital, the Fairclough-Bourdieu Framework defines for policy actors the need to select, and use, identified discourse technologies and symbolic capital if the policy objective is to produce radical policy change, such as that studied in this thesis. Finally, the model recognises that policy actors can learn to be more effective, including the possibility of mimetic behaviour in relation to the habitus of the field to which they wish to participate within.

The notion of the field of study (in this thesis 'English HE policymaking' for example) is recognised as erecting barriers to entry for policy actors not able to work within the doxa of the field in their behaviour, connections, identities and discourse. Entrepreneurs are thus not simply able to facilitate an alignment of the problem, political and policy streams on account of their entrepreneurial flair, they must first gain permission to enter the field in which the policy window emerges or occurs. The existence of a field within a hierarchy of fields, where there are supra-level fields in play, with members and actors who may exert power within the sub-field that is the object of study, is also significant. The field thus emerges as an important concept in explaining why there may be a lack of policy entrepreneurship even where the three streams may be thought to align. In studying the field and behaviour of actors within it, study of the acceptable forms of discourse and behaviour identifiable through use of the technologies and insights in the Fairclough model, can be used to predict which actor behaviours are likely to be effective and thus which agendas are likely to be effectively facilitated by agentic actors.

After having navigated the field dynamics, problem, politics and policy streams can align, with policy actors equipped to facilitate policy formulation and decisions in the policy window represented by the stage of the policy process addressing formulation and decision-making. To identify this 'stage' it is necessary to understand the rituals of public policy, such as consultation exercises, that

represent the 'game' that permitted and equipped actors are committing to play. In the policy window, the Fairclough-Bourdieu Framework provides tools for the analysis of discursal exchanges that form the basis of power dialectics as each actor seeks to promote their own end goals. The chronology of these exchanges should be understood in order to track the development of argument, as too should the pre-existing texts and discourses in order that inter-textual and inter-discursive chains, that are often used to powerful effect, can be identified. Again, in the policy window, if significant policy change is to be produced, the researcher should look for the presence of symbolic violence that is important in seeing that stakeholders mis-recognise the other forms of harm being done to their interests.

Finally, following activity in this stage, or Policy Window, policy change can be produced. Whilst some policy change can be produced without the exercise of discursal power and symbolic violence, the presence of these features are necessary to produce radical, paradigm-shifting policy decisions.

Questions for further research into the policymaking process

In this concluding chapter, this thesis has attempted to mark out the contributions made to the methodology of policy research, the practice of policy discourse dialectics, and the theoretical understanding of the formulation and decision-making stages of the policy. The final section below considers questions for further research into the policymaking process prompted by this thesis.

First, the augmentation of Fairclough's CDA model developed in this study, with the introduction of the concepts of power discourse; simplification; tangentiality; level-shifting; and temporality, need to be applied in further examples of public policy development to assess their wider utility. Similarly, it would be valuable to examine whether the practices of 'quasi-academic discourse' and 'higher-power referencing' revealed in this analysis of UK Government higher education policy inter-discursivity, are used in other examples of Government policy discourse practices. Are there particularities to English HE policy, or are the features applicable to other domains of English policymaking? Much of the policy theory literature creates theories arguably applicable across national and cultural boundaries (Fischer, Frank and Miller, 2006; Sabatier, 2007). CDA and Bourdieu have similarly been applied in many different national and cultural contexts. Does the Fairclough-Bourdieu Framework for Policy Analysis developed here have the same applicability in other national and cultural contexts, to demonstrate its international utility as other theories of policymaking and societal power have done?

Second, there would be value in applying the approach of integrating actors, their agency and their relationships within the Fairclough Three-Dimensional Model, as detailed above. Replicating such a study, using Fairclough but with a specific focus on policy actors at each of the three 'dimensions' of discourse, would be valuable. It would provide further cases with which to explore the explanatory strength of this approach to the critical study of policy.

Thirdly, there may be additional value in engaging a team of researchers in approaching a Fairclough-Bourdieu Framework analysis of a complex policy moment. The scale of a thorough investigation of policymaking using the

methodologies applied here requires considerable research resource. That resource might come through engaging in a research project as a team exercise, with different members of the team exploring different dimensions revealed through the CDA model and following the 'leads' revealed through peeling back to layers of power at play in the production of policy proposals in text. As noted earlier in this chapter, researchers in the team might engage in widespread interviewing of policy actors in a given policy moment; they might apply social network theory and map all social and professional contacts of all individuals identified as important in the production of policy, such as modelling all recorded meetings of a particular policy actor, such as a Government Minister; they might map all discursal exchanges on multiple platforms – such as in speeches at conferences, on social media platforms for policy actors, in other recorded minutes of formal meetings at which policy ideas are discussed; they might have a team member focused on understanding and documenting the field hierarchies and mapping the dynamics of power between and within different fields.

Fourth, there are opportunities to apply new computational techniques to the practice of critical discourse analysis and the mapping of relationships required in the Fairclough-Bourdieu Framework. Additional research resources for a project examining policy discourse might also be brought in another way, through the application of machine-learning to quantitative corpus linguistics. The empirical identification of the habitus and doxa of a field is a detailed and time-consuming exercise beyond the bounds of many research projects, which are themselves bounded by contractual commitments to employers, resource constraints of time and money, access and availability. The field of artificial intelligence has the potential to reveal patterns in discourse within fields, to identify fields as connected networks of social practitioners and to then follow the nodal operators and their influence over the doxa (Schuster, 2021; Moezkarimi, Ghassemi and Mousavi, 2022).

Computational power and self-learning machines can explore multiple dead-ends of research to arrive at those elements that constitute the discourse of a field (McGillivray, 2020). If that can be identified, documented and revealed, it can then be taught to others. The first consequence may be that researchers could become 'actors' able to mimic their possession, such as in dramaturgical interviewing (Berg, 2014) where the interviewer attempts to create 'an appropriate climate for informational exchange and mutual disclosure.' (p108) and gives emphasis to using the situation of the interview, created by the interviewer, in order to obtain disclosures that would otherwise not be forthcoming. For researchers, having knowledge of the markers of boundaries restricting entry to fields for researchers, so that behaviours of the field may be learned and practised, may mean they can then make themselves indistinguishable from the 'genuine' members of that field that the doxa are designed to exclude them from. This might bring a more sophisticated approach to ethnography (Atkinson et al., 2001; Emerson, Fretz and Shaw, 2001) and critical anthropology (Bucholtz, 2001). The second consequence of may help the lone researcher to tackle the breadth and depth required to apply a Fairclough-Bourdieu Framework methodology successfully in the understanding of how policy is made. Although the technology is in its infancy (McGillivray and Tóth,

2020) and algorithms have not yet been developed for use in the study of power and policymaking, there are now some researchers exploring the use of computational linguistics in critical discourse analysis (Xiao and Li, 2021). This would make Fairclough-Bourdieu Framework studies of complex policy moments far easier to conduct.

Finally, and potentially of greatest future significance to the critical understanding of policymaking processes, would be to apply the integration of Kingdon's Multiple Streams Approach with the Fairclough-Bourdieu Framework in a different policy situation. There appears to be considerable potential in strengthening both critical discourse analysis studies of policy and in complementing Kingdon's extensively used approach. Conducting studies of this integrated approach has the potential to strengthen the understanding of agency and the conscious action of policy actors within the CDA approach. It would also increase the critical insights of the Multiple Streams Approach, with the power to explain why policy moments when the three streams are aligned do not occur.

Perhaps with the maturation of this approach it will be possible to give an even more comprehensive answer to the question 'How is policy made?'.

Postscript – The Fairclough-Bourdieu-Framework as a weapon of resistance

A universal research tool

Critics of Critical Discourse Analysis have argued that the methodology is suited only to radicals challenging elite power and the status quo. They claim it allows left wing researchers to justify their own prejudices, as opposed to revealing genuine insights evidenced empirically. This thesis has however shown that the Fairclough-Bourdieu Framework for Policy Analysis can have significant utility for researchers or policy actors of any political persuasion: it can provide a set of tools for understanding and using discourse to extend elite power, if that is the agenda of the user in question. Methodologically, it brings too great a set of insights to be dismissed merely because it is used by those with an emancipatory agenda.

Accounting for the lack of effective resistance

It is nonetheless the case that many who take a critical ontological orientation do so from a belief that a different distribution of power in society, a more egalitarian distribution, would be desirable. They often point to the detrimental effects of modern capitalism and seek to analyse and explain in order to resist and to change the social order. As van Dijk said of critical discourse analysis: 'Unlike much other scholarship, CDA does not deny but explicitly defines and defends its own socio-political position.' (Van Dijk, 2001, p96). As noted in chapter IV, the author of this thesis was open about their political orientation (as CDA method prescribes). They see the Green and White papers as Government breaching the barricades defending the public realm against a final stage of neo-liberalism within the English higher education space – barricades which have been more effectively defended in other parts of the world. Those who saw the measures allowing private profits to be made in HE with public money as of only minor significance would be well advised to review the later literature on the growth of private providers (Hunt and

Boliver, 2023) to see how, having breached the barricades, the rentiers were able to rip through the English HE sector, looting the public purse.

It is also not as if it could not have been seen. In 2013 Andrew McGettigan warned, through a remarkable, technically erudite, yet very readable book, of the impending situation and the need for resistance:

'...as a football fan, I consider higher education to be on a cusp of a transformation akin to that which befell the sport 20 years ago, when the breakaway Premier League and Sky TV money combined with the regulatory arbitrage of corporate restructuring to reroute the financial circuits of the game. We are about to witness something similar in higher education: a new elite will cement its position by monopolising resources in new ways, while the majority of institutions will be left to scrap in a new market swamped with cheap degree providers. We have a chance to avert the worst excesses and even avoid this fate, but it depends on what we do before the 2015 election.' p. ix (McGettigan, 2013)

Those public universities who were perhaps more concerned at the time with the niceties of the Teaching Excellence Framework and in emphasising difference between public university groupings might reflect on why, seven years on, they struggle to make a convincing case for increased funding from the public purse, are beset by industrial unrest and student litigation, having won no more in the White Paper reforms than a single year of inflationary uplift in the pre-existing level of maximum fee that could be charged to English undergraduates. They might do well to reflect on the symbolic violence done to them, as they misrecognised the economic violence that was the main purpose of the 2016 reforms, and think on whether they should have mounted a more effective defence at the time. In particular, those universities who held most political power at the time, those in the Russell Group, and whose mission group policy actors displayed the most powerful skill in discourse, might remember the words attributed to Pastor Martin Niemöller in 1946:

'First they came for the socialists, and I did not speak out—because I was not a socialist.

Then they came for the trade unionists, and I did not speak out—because I was not a trade unionist.

Then they came for the Jews, and I did not speak out—because I was not a Jew.

Then they came for me—and there was no one left to speak for me.'

So, when it is determined that Research England research grants and funding must be opened to private for-profit competition or when Government proposes the 2025 Lifelong Learning Entitlement adopts delivery criteria favouring private operators over public institutions in the interests of 'choice' and 'flexibility'; when the neo-liberals have finally come for the country's research intensive universities, will those universities regret the choices they made back in 2015-16?

To the author it is a disappointment, though not a surprise having conducted this research, that they did not mount a stronger resistance. This study has provided an explanation of why this was allowed to happen. The effects of the habitus, the clever use of discourse, the duping of policy actors keen to play the game in the right way, the mood music across government, the lack of radical confidence at the supra-level field of UK politics and public policy, post the financial collapse in 2008 that led to the election of the Coalition and then Cameron governments, all these

factors, revealed through the FBF approach, contributed to the majority of the sector not seeing the damage being done until it was too late.

A variant of this explanation is that they acquiesced to a particular form of symbolic violence, sedimented into their psyche over the previous thirty years of NPM, and succumbed to what Naidoo (2018) describes as the 'fetish of competition'. 'Emotionally, the fetish invokes feelings of power and pleasure as well as desire. Most importantly, the invisible hand of competition provides the means by which no-one is responsible for negative effects apart from the victims themselves.' (ibid, pp3-4). Competition produces an emotional release. For those who think that conditions of competition have shown them to be winners, winners as a result of their own agency and superiority, they will sustain a competitive status quo rather than fight it, moved by pathos rather than logos. In the thirty years of NPM, the marketisation and practices of academic capitalism may have done more than just dull the senses and cause misrecognition in the leaders of powerful universities and their agents. Perhaps these conditions went further to create emotional addiction, feeding ego of institutions and their principal policy actors: they failed to mount effective resist because they enjoyed the emotional 'rush' of winning in a competition.

Universities were more concerned with changing relations within the public university space that they missed the significance of the Green Paper proposals. They emphasised their differences from those other universities in other mission groups, over which they may have felt to have 'won', and could not rouse themselves to a more spirited defence against a measure that opened a sluice gate for public funds to flow to fertilise soil that private capital interests would come to till in increasing numbers. Similarly, much of the academic literature of academic capitalism, including that published most recently (Fredricks-Lowman, 2020; Croucher, 2022; Nehring, 2023) has ignored questions of financial control in favour of charting the continuing extension of new public management techniques within public universities and attempts to make them more entrepreneurial in order to generate income for the institution or public economic benefit. This focus on organisational and academic behaviours in knowledge production, whilst ignoring the changing patterns of ownership of the means of that production, however limited, is curious. Indeed, even in a 2023 study entitled 'The diversity of the English higher education system...' (Barbato et al., 2023), no mention is made of private provision, and 'university' is equated with 'the higher education system', despite the evidence of significant growth in that private provision visible in both quantitative and qualitative analysis (Hunt and Boliver, 2023). It does however illustrate the need to maintain a critical orientation to one's own role, immediate field and organisation, to investigate the doxa of one's own habitus, as both Fairclough and Bourdieu recommend, so as to ensure it is understood why certain questions are not asked as well as why others are.

Planning an effective resistance for the next assault

So, what can this particular 'policy moment' of the Green to the White Paper and the Fairclough Bourdieu Framework tell us about strategies for resistance to use in the future when the next attack on public goods and liberal democracy is mounted? How might radicals and those who believe in protecting public universities

respond? A few simple measures from FBF are proffered for consideration to help universities ready themselves for the next attack:

The first, in a post truth world, is to subject the Government's use of quasi-academic discourse to close scrutiny and to call out Government when it does it – it may in part be laziness on the part of Government policy actors, because it is possible to get away with it, but a more critical and thorough examination of policy proposals and their academic references should lead to a more evidence-informed policy debate. The fact Government policy actors still bother to use this discourse technology suggests there is still consensus in the field that evidence-informed policy is superior;

Second, is simply to learn and adopt the techniques of power discourse to win written arguments, write using discourse technologies to influence the subconscious of readers. Be better at using discourse technologies than Government.

Third, is to engage in policy discourse across multiple platforms, not just in formal exercises where interactional controls stack the cards against the stakeholders. In those formal consultations, be critically aware of power being applied and analyse closely all aspects of the exercise, including, for example, analysing the stakeholder responses that will typically have been helpfully synthesised by Government, often politically. But remember to apply these discourse technologies in social media, at conferences, in print media.

The final proposed dimension is to apply a strategy of resistance that exploits the full resources of universities. Draw on academic expertise in universities on power, discourse, influence, and system change, and apply them more effectively in coordinated responses made by university policy actors, rather than adopting an elitist managerial approach to achieving policy influence. Doing it well requires time and expertise to succeed. Universities could deploy a formidable intellectual army: they may need to in order to rebuff the next attack. They should exploit extensive university networks across field hierarchies – reference these in discourse, use heuristics and simplicity, engage at conceptual levels and be self-critical and reflexive in whether the discourse it is applying is its own, or if it a dimension of the symbolic violence being done to public universities.

Resistance is possible. Discourse is a weapon. 'It does ideological work' . If further neo-liberal advances are to be averted, it must be used consciously and critically as part of the armoury of resistance.

Appendix I: Fairclough's Three-dimensional Critical Discourse Analysis: A short summary of the method for discourse analysis, with proposed augmentations

Introduction

The table below shows the nine different analytical properties, or discourse technologies, identified in Norman Fairclough's Three-Dimensional Model of Critical Discourse Analysis, presented in a table adapted from Locke (2004). The descriptions of the different properties have been written for the purposes of this thesis.

At the foot of the table are the additional discourse technologies identified in the course of this research and intended to augment the Fairclough model to support the analysis of policy discourse using CDA.

Analytical property	Description
10. Interactional control	Stylistic and grammatical methods to cue the reader to use the text in particular ways
11. Modality	The strength of endorsement of a particular statement, emphasized (or de-emphasized through modal auxiliary verbs (such as 'could'), adverbs (such as 'possibly' 'certainly'), and tentative or assertive verbs (such as 'may' or 'are')
12. Politeness	The forcefulness of statements, whether assertions, accusations, or declarations. Looking particularly for evidence of where there is an absence of assertion or attack, a 'politeness' designed to avoid engendering a countering response in a written or verbal exchange, seek to signal a technique to sustain the existing social order.
13. Ethos	The way that people signal (or seek to conceal) their own social identity through particular verbal and non-verbal signifiers.
14. Connectives and Argumentation	The 'cohesion' of a text in the sense of how clauses relate to one another and how arguments are built

<ul style="list-style-type: none"> e. Reference f. Substitution and ellipsis g. Conjunction h. Lexical cohesion 	<p>through elaboration, extension, or advancement. Four techniques are identified:</p> <ul style="list-style-type: none"> a. Are personal pronouns and demonstratives used to refer to things earlier or later in a text, signaling acceptance through informality for example? b. Are words used to substitute for others after a first usage, or ellipses used to signal norms and acceptance? c. Are conjunctions such as ‘because’, ‘and’ and ‘therefore’ used to create continuity in argument and apparent consistency at an ideational level? d. Are common collocations of words used signaling familiarity or popular synonyms adopted where the extent to which the terms are synonymous might be contested?
<p>15. Transitivity, theme, and nominalisation</p> <ul style="list-style-type: none"> g. Relational h. Action i. Event j. Mental k. Theme l. Nominalization 	<p>Features of grammar whereby ideational aspects are coded, implicit, or even hidden. Four types of transitivity process are defined:</p> <p>Relational: the way a verb may connect two actors</p> <p>Action: close attention to the causality, responsibility, and agency in clauses – are they specific or vague? Is the passive voice used to take actors from the action?</p> <p>Event: In a subject-verb clause, has the intransitive form (e.g., All institutions agreed) been used, suppressing the direct object?</p> <p>Mental: Are cognitive verbs (such as ‘exemplify’, ‘think’, ‘feel’) used? How are they used? Are they used in transitive clauses (such as ‘Challenger institutions feel excluded) giving emphasis and force to rhetorical argument?</p> <p>In addition, Fairclough identifies two other grammatical aspects:</p> <p>Theme: Are some elements of a clause given prominence such that they are presented almost as ‘common-sense’, dulling the critique that they might be otherwise be subject to.</p> <p>Nominalization: Are processes adapted to become nouns or noun phrases facilitating the elision of either the agent or the goal or both? (e.g., ‘Low</p>

	participation neighbourhoods produced few applications', rather than 'Learners from working class wards did not apply to university')
16. Word meaning	Has the potential of some words to have a number of different meanings been exploited to stretch and distort its semiotic significance? Have particular meanings of words been used or manipulated (for example by seeking to describe certain unpopular propositions in the language of terms readily accepted by the discourse receivers), in order to subtly shifting the meaning and produce a reinforcement of acceptance.
17. Wording	Have words been used to describe particular nouns or objects to provide or suppressive emotive charge (such as 'alternative providers' rather than 'private for-profit companies' so as to influence the reader's perceptions? What is the word count of particular words? Are certain words or phrases used extensively, suggesting a desire to normalize them? Are particular words used to reinforce inter-discursive chains between texts?
18. Metaphor d. Simile e. Personification f. Metonymy	<p>The choice of metaphor (simile, metonym, and personification) can be used to influence the way the reader thinks about and acts in relation to a text (e.g., 'collateral damage' as opposed to 'soldiers shot dead by their own side'). They are influential in the persuasiveness of a text and their usage prompts questions of why they have been used, what is the discourse intent?</p> <p>Metonym: a word, name, or expression used as a substitute for something else with which it is closely associated. For example, <i>Washington</i> is a metonym for the US government.</p> <p>Simile: a figure of speech involving the comparison of one thing with another thing of a different kind, used to make a description more emphatic or vivid (e.g., <i>as brave as a lion</i>).</p> <p>Personification: the attribution of a personal nature or human characteristics to something non-human, or the representation of an abstract quality in human form.</p>

Augmentations to the Fairclough Three-Dimensional Model for use in analysing policy discourse

New forms of discourse technologies

Analytical Property	Description
19. Simplification	The communication of any change as a simplification of previous complexity and the presentation of policy in very short, simple messages that provide heuristics for understanding policy and the complexities of the world
20. Tangentiality	<p>There are two forms of tangentiality:</p> <ul style="list-style-type: none"> c. the presentation of a significant policy proposal away from the 'critical path' of a narrative policy argument, such as by describing it in a single point as part of a bulleted list, to divert attention from it, whilst being able to say that consultation responses were invited on it. d. at the level of discourse structure and inter-textual relationships, the separation of policy proposals and decisions from other significant aspects of the policy development, such as the synthesis of stakeholder consultation responses or parallel consultations about 'technical' matters.
21. Level-shifting	A shift in the 'level' of the policy discourse, for example from operational implementation to concepts or vice versa, used to add weight to the power of the discourse deployed or to divert from a weakness of policy argument.
22. Temporality	<p>Reference to time in policy discourse, either to justify a change by describing the previous situation as anachronistic, by projecting a view of the future that is optimistic and long-sighted, or by describing milestones of policy implementation to build confidence that the policy proposer has a clear plan for how to enact the policy.</p> <p>It is also used to show lineage to policy proposals and emphasise continuity, playing on default preferences for maintenance of the status quo amongst many in the consulted policy community.</p>
23. Power-discourse	The combination of several discourse technologies within a single passage, producing high density and powerful, influential writing and revealing aspects of

	policy that the writer is particularly concerned to see succeed, or, in opposition, those they wish to see removed.
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Two forms of inter-discursivity in policy discourse

Form of inter-discursivity	Description
'Higher power' referencing	The practice of making connections, inter-textual or discursual, between the policy argument being put forward and other actors recognised as possessing forms of elite power in other fields.
'Pseudo-academic' discourse	The use of the academic form of discourse where the sources referenced do not support the substance of the policy argument in the main text. May indicate policy has been decided in advance of evidence being gathered.

LOCKE, T. 2004. *Critical discourse analysis*, London London ; New York, London : Continuum.

Appendix II: Chronology of the policy process

The purpose of this section is to document and explore the significance of the precise timing of different contributions to the policy process to understand the ‘conversational’ policy process is a genuine dialectic where discourse of one policy actor influences the other, or whether the policy process is more characterised by individual voices shouting into a void.

The table below shows the precise dates of key policy reports, publications, and written stakeholder responses, where there is a reference within the text of a response by another organisation or they are judged as significant for the purposes of this study.

The table marks when certain consultations or reviews were opened and closed as well as when their reports were published. There are three reasons for this: first, in order to mark the point at which an influential policy actor ‘takes to the stage’ and might reasonably be considered to be having some influence over other policy actors; second, the period between the open and close of a consultation may see some actors preparing their own policy responses and creating discourse, and third, the publication of the final reports from Government as a substantive codification of their work in the form of a report on next steps or published response, in itself shapes subsequent policy discourse, in theme and form. The principal policy actor responsible for the published discourse is identified together with the type of actor – categorised in four categories: Government, Academic, Political or HE Stakeholder.

Date	Published policy discourse	Policy actor	Type of actor
08/12/2010	Prime Minister's speech on widening participation	David Cameron	Government
28/06/2011	Coalition Government HE White Paper ‘Students at the heart of the system’	BIS	Government
16/07/2013	Higher Education Commission Report: ‘Regulating Higher Education’	HE-Commission	Academic
18/11/2014	Sir Paul Nurse Review of Research Councils begins	BIS/ Sir Paul Nurse	Government/ Academic
02/12/2014	National Audit Office publication of Investigation into financial support for students at alternative higher education providers	HoC/NAO	Political
18/12/2014	RAE2014 Results published	BIS/HEFCE	Government
12/02/2015	Universities UK report ‘Quality, Equity, Sustainability: the future of higher education regulation’ published	UUK	HE Stakeholder
12/03/2015	Competition and Markets Authority publishes ‘UK higher education providers – advice on consumer protection law	CMA	Government

	Helping you comply with your obligations'		
25/06/2015	HEFCE publishes ' <u>Outcomes of Student Opportunity allocation and National Scholarship Programme monitoring for 2013-14</u> ' (HEFCE 2015/09)	HEFCE	Government
29/06/2015	HEFCE publishes ' <u>Future approaches to quality assessment in England, Wales and Northern Ireland: consultation</u> '	HEFCE	Government
01/07/2015	James Wilsdon 'The Metric Tide: Report of the Independent Review of the Role of Metrics in Research Assessment and Management	BIS/James Wilsdon	Academic
01/07/2015	<u>Consultation on targeting funding for disabled students in Higher Education from 2016/17 onwards</u> opens	BIS	Government
01/07/2015	Jo Johnson, Ministerial Speech: Teaching at the heart of the system'	Minister	Government
15/07/2015	HEFCE 'Consultation on Future approaches to quality assessment in England, Wales and Northern Ireland' opens	HEFCE	Government
16/07/2015	HEFCE 'Invitation to comment on future changes to the UK Performance Indicators' opens	HEFCE	Government
18/10/2015	HEFCE 'Consultation on Future approaches to quality assessment in England, Wales and Northern Ireland' closes	HEFCE	Government
18/10/2015	HEFCE 'Invitation to comment on future changes to the UK Performance Indicators' closes	HEFCE	Government
24/10/2015	<u>Consultation on targeting funding for disabled students in Higher Education from 2016/17 onwards</u> closes	BIS	Government
28/10/2015	HESA 'Data Futures' consultation opens	HESA	Government
6/11/2015	The Green Paper published	BIS	Government
19/11/2015	The Nurse Review of Research Councils reports	BIS/Sir Paul Nurse	Government/ Academic
25/11/2015	Government Spending Review 2015 published	Treasury	Government
02/12/2015	<u>Consultation on targeting funding for disabled students in higher education from 2016 to 2017 onwards - government response</u> published	BIS	Government
08/12/2015	HESA 'Data Futures' consultation closes	HESA	Government
	Cambridge/IFS research into linking HRMC and HESA data begins		

08/12/2015	OFFA Director for Fair Access press release about TEF unintended consequences for fair access	OFFA/Les Ebdon	Government
21/12/2015	Responses to the July 2015 invitation to comment on future changes to the UK Performance Indicators	HEFCE	Government
15/01/2016	UUK Response to Green Paper	UUK	HE Stakeholder
15/01/2016	GuildHE response	GuildHE	HE Stakeholder
15/01/2016	MillionPlus response to Green Paper	MillionPlus	HE Stakeholder
25/01/2016	Russell Group response to Green Paper	Russell Group	HE Stakeholder
15/01/2016	University Alliance response	University Alliance	HE Stakeholder
27/01/2016	Stern Research Excellence Framework review begins	BEIS/Lord Nicholas Stern	Government/Political
29/02/2016	House of Commons Business Innovation and Skills Select Committee publishes 'The Teaching Excellence Framework: Assessing quality in Higher Education'	House of Commons	Political
18/03/2016	HEFCE publishes 'Revised Operating Model for Quality Assessment'	HEFCE	Government
24/03/2016	Stern Review 'Research Excellence Framework review: call for evidence	BEIS	Government
16/05/2016	Publication of synthesis of Green Paper consultation responses	BIS	Government
16/05/2016	The White Paper published	BIS	Government

Appendix III: Example coding of discourse in Nvivo

Introduction

This appendix describes the method used in the coding of discourse within the selected texts. It goes on to provide examples of a piece of coded text (figure 6), showing coding stripes against the codes derived from the table of analytical categories in the Fairclough three-dimensional Model of Critical Discourse Analysis (CDA) in appendix I and summarised in the screenshot from Nvivo in figure 5 below. Finally, it shows an example of a coding frequency query of the texts studied for this thesis in the screenshot at figure 7.

Method for coding texts using the CDA typology of discourse technologies

The discourse used in the texts studied for this thesis has been coded and analysed using the Nvivo qualitative data analysis computer software package.

1. The principal pieces of policy discourse (the policy texts) analysed in the thesis were downloaded and stored within the Nvivo project file. These are listed in the 'Data/Files' section.
2. The nodes that data has been coded against (using the table of augmented CDA discourse technologies provided at appendix I) are in the 'Codes/Nodes' section. Some nodes have a number of 'sub-nodes' visible by clicking the drop-down. Coding was carried out manually, with judgement used as to the presence of each of the CDA discourse technologies within each of the identified sections of the text.
3. For some elements of the research, word-frequency searches are used to compare different documents, such as when looking at the different frequency of particular words in the Green Paper and White Paper. There is a second sub-folder entitled 'non-CDA codes' that contains other codes derived from word-frequency analysis in the Green Paper document.
4. The number of words used by different stakeholders in answering different questions was calculated using a simple word count of each document.
5. For some texts there are notes to accompany different paragraphs of discourse. The full detailed analysis of the Green Paper derived from these annotations is provided at appendix IV. These notes are found in 'Notes/Annotations'. Clicking on the annotation will show which piece of text the note refers to in the source text.
6. Reports on the different instances of text coded against the nodes are found in 'Search/query results'. Queries used to produce those results are found at 'Search/Queries'. They are mostly very simple, reporting instances of coding against a single node, as opposed to examples of coding against, for example, two nodes simultaneously. There is one report showing the instances of co-coding of all nodes against all others entitled 'All nodes v all

nodes'. For the purposes of this study 'coding density' can be used to identify sections of the text exhibiting 'power discourse' where multiple discourse technologies are used simultaneously in a section or paragraph.

Examples of Discourse Coding and Analysis using Nvivo

Name	Files	References	Created on	Created...	Modified on	Modified by	Color
Argumentation and conne...	7	275	6 Feb 2020 at 23:51	SLM	20 Mar 2022 at 18:...	SLM	●
Conjunction	7	180	6 Feb 2020 at 23:51	SLM	23 Mar 2022 at 08:...	SLM	
Lexical cohesion	5	47	6 Feb 2020 at 23:51	SLM	13 Mar 2022 at 17:43	SLM	
Reference	7	33	6 Feb 2020 at 23:51	SLM	3 Jan 2022 at 18:54	SLM	
Substitution and Ellipsis	5	11	6 Feb 2020 at 23:51	SLM	23 Mar 2022 at 08:...	SLM	
Continuity	6	98	13 Sep 2020 at 21:...	SLM	20 Mar 2022 at 17:...	SLM	
Continuity discourse	1	6	20 Mar 2022 at 12:51	SLM	23 Mar 2022 at 07:...	SLM	
Ethos	6	39	6 Feb 2020 at 23:51	SLM	13 Mar 2022 at 19:12	SLM	●
Evolutionary discourse	1	4	20 Mar 2022 at 17:31	SLM	23 Mar 2022 at 08:...	SLM	
Inter-discursality	7	143	9 Apr 2020 at 10:14	SLM	20 Mar 2022 at 12:...	SLM	
Inter-textuality	5	91	21 Feb 2020 at 15:45	SLM	20 Mar 2022 at 17:...	SLM	
Interactional control	5	56	6 Feb 2020 at 23:51	SLM	20 Mar 2022 at 17:...	SLM	
Level	7	77	12 Mar 2021 at 09:18	SLM	20 Mar 2022 at 17:...	SLM	
Metaphor	6	77	6 Feb 2020 at 23:51	SLM	23 Mar 2022 at 07:...	SLM	●
Metonym	3	7	6 Feb 2020 at 23:51	SLM	3 Jan 2022 at 17:00	SLM	
Personification	2	6	6 Feb 2020 at 23:51	SLM	20 Mar 2022 at 12:41	SLM	
Simile	3	12	6 Feb 2020 at 23:51	SLM	21 Aug 2021 at 15:22	SLM	
Modality	6	335	6 Feb 2020 at 23:51	SLM	2 Jun 2021 at 23:15	SLM	●
New discourse	1	3	14 Mar 2022 at 07:19	SLM	18 Apr 2022 at 12:41	SLM	
Politeness	7	341	6 Feb 2020 at 23:51	SLM	20 Mar 2022 at 17:15	SLM	●
Power discourse	6	36	8 Mar 2021 at 22:43	SLM	20 Mar 2022 at 18:...	SLM	
Simplicity	4	41	29 Apr 2020 at 08:...	SLM	23 Mar 2022 at 08:...	SLM	
stakeholder discourse	1	7	14 Mar 2022 at 07:19	SLM	23 Mar 2022 at 07:...	SLM	
Tangentialism	3	8	12 Mar 2021 at 14:16	SLM	20 Mar 2022 at 17:...	SLM	
Time	6	85	28 Mar 2021 at 23:...	SLM	5 Feb 2023 at 13:33	SLM	
Transitivity	7	351	6 Feb 2020 at 23:51	SLM	22 Mar 2021 at 16:...	SLM	●
Transparency	2	4	10 Feb 2020 at 07:51	SLM	13 Mar 2022 at 19:12	SLM	
Untitled	1	1	13 Mar 2022 at 18:...	SLM	13 Mar 2022 at 18:...	SLM	
Word meaning	6	122	6 Feb 2020 at 23:51	SLM	23 Mar 2022 at 07:...	SLM	●
Wording	7	161	6 Feb 2020 at 23:51	SLM	18 Apr 2022 at 12:41	SLM	●

Figure V: Top level coding using codes from the table of (augmented) CDA discourse technologies

The screenshot shows a document titled 'russellgroup... The Green Pa...' with a list of codes on the right side. The codes are: Metaphor, Nominalisation, Emphasis, Metonym, Lexical cohesion, Word meaning, Event, Wording, Inter-textuality, Transitivity, Level, Auxiliary verb, Inter-discursality, Assertion, Modality, Patience, Conjunction, Argumentation and connections, Continuity, Adverb, and Coding Density. The document text contains several paragraphs of text, with blue coding stripes applied to various parts of the text, indicating the presence of these discourse technologies.

Figure VI: Example of coding from the Russell Group response to the HE Green Paper using 'coding stripes' derived from the Fairclough CDA typology of discourse technologies

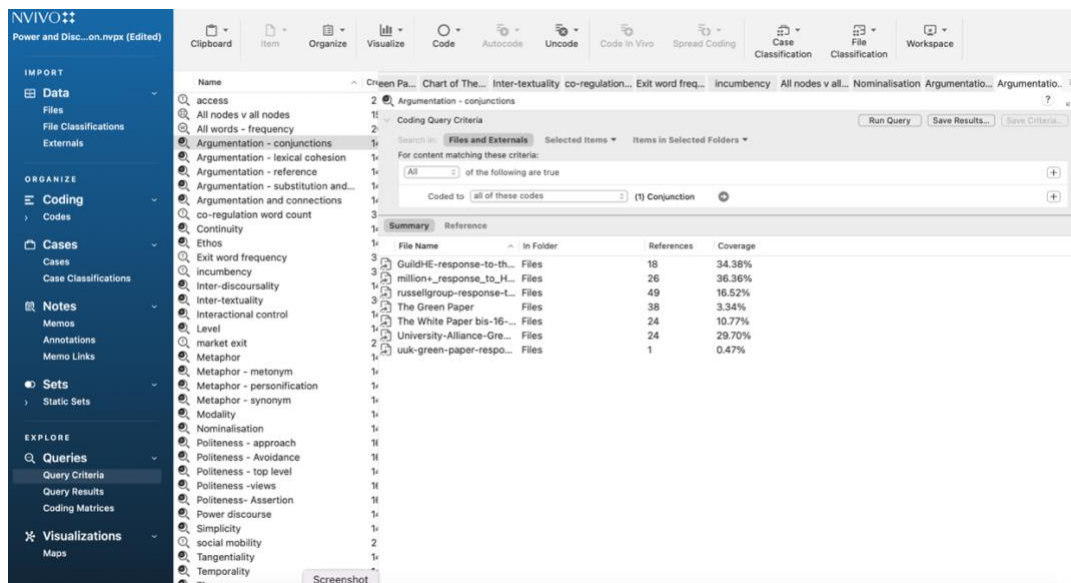


Figure VII: Example of a coding frequency query of the texts studied

Facilitating further research using the Nvivo file and workbook Copies of the Nvivo file and workbook for all analyses of the pieces of discourse studied for the thesis are available from the University of Bath research repository. These are provided for two reasons. First, it provides transparency in terms of research methods, coding judgements, and analysis that underpins the conclusions and synthesis that appears in the main thesis. Critics of CDA make claims of subjectivity and pre-formed conclusions. The publication of coding fields and coding, together with annotations, allows replication of the same methods with the same sources.

Secondly, sharing underlying analyses and coding in an open data approach to research allows a community of researchers to build on the hours of work done by others and to use that work to address other research questions or combine sources in different ways. It is offered in that spirit.

Appendix IV – A detailed textual analysis of the Green Paper using Fairclough’s Three-dimensional Critical Discourse Analysis methodology

Introduction

This appendix uses Fairclough’s analytical categories for analysing discourse in text to examine the discourse of the Green Paper in detail. Each section of the document is explored. Throughout the analysis below, the paragraph and page number for the text being analysed prefaces a commentary relating to the discourse in the section in question.

The Analysis

Foreword

[p8, heading] This is classic discursive form for a Green or White paper in England - a supposed personal foreword direct from the minister, who speaks using personal pronouns.

[p8, para1] This creates a supposedly causal connection between two events that are related but for which there is a great deal of complexity, with other factors, such as the behaviours of other actors and market forces, playing a part. Arguably one way that policy discourse exercises power is through its heuristic capacity: by translating the complexity of the world into supposedly simple solutions, which others, bewildered by the complexity of life, find it easy to follow. The pretence of simplicity also dulls the critical faculties of actors through diverting them from engaging with complexity and in doing so sees them accept the solutions offered in elite discourse.

[p8, para7] The first move from 'universities' to 'providers' sees the familiar technique in the document of collocating 'provider' with 'high quality'. Evidence available at the point of publication (including from the National Audit Office) suggests that a large part of the 'providers' who had been enabled to enter the market delivered anything but high quality. It is presented as common sense that 'competition is good', 'high quality providers' should be allowed to provide HE, and that the purpose of 'our regulatory structure' (note the ownership of Government of the means of regulation) should be to 'drive value for money for students and taxpayers' as opposed to plethora other purposes.

[p8, para8] The inter-textual chain between the Conservative Party manifesto document and the Green Paper is referenced here. The metaphor of solid soldering

on a circuit board signals a permanence to measures that will incentivise excellent teaching - that Government will 'hard-wire' this.

[p9, para 1] Common sense theme asserted here - why is setting up a new institution a good thing?

Introduction and executive summary

[p10, para6] This is not in fact true. The source for the claim - a document commissioned by and published by Government - repeats this phrase and refers to the 'evidence report' for the source. The only source quoted is on p50 stating that 26% feel they lack quality applicants. This is an example of interactional control - presenting cases in faux-academic style where the sources do not support and the sources referenced are controlled by Government not peer-reviewed. The form, with references and footnotes suggests rigour and objectivity, which is not the case.

[p11, para 1] 'Too many' is asserted without a statement of what proportion this is or where the source is or why any level is 'too many'

[p11, para 4] Here again is an example of assertion without evidence - with an argumentative narrative that suggests logical connection between two things - We the government have made student choice important as a driver, students are disempowered through a lack of information. This is also evidence of a 'common sense' theme.

[p11, para 5] The phrase asserts a number of things in this paragraph, it uses 'we' to return to the informal style after a short section of evidence, and provides no sources for many of its claims, whilst asserting that 'we know that...', 'individuals need...', 'so it is essential that they...'

[p11, para 6] This shows interactional control - an assertion (without evidence) that most league tables do not include a measure of teaching quality, which sets the reader up to expect a remedy. It goes on to assert 'we know that...' but its supporting evidence is less strong '[these sources] are examples...that are relevant'.

[p12, para 3] Understandable calls from whom? - nominalisation or the removal at least of the actor

[p12, para 4] 'Degree inflation' is chosen in favour of 'continuous improvement in attainment' or similar, with the assumption that it is due to a compromising of standards, a frequently visited theme for Conservative politicians in schools policy. The description that students 'suffer' from 'degree inflation' suggests personal loss which is not immediately obvious despite the explanation provided in the paragraph.

[p12, para 4] The old trope of deserving and undeserving poor is introduced here with the notion of the deserving ('hard working') and undeserving students. The student that asserts their power in the market by collective action is seen later in the document as an organisation to be controlled. The market is not about empowerment but disempowerment of individual transactions that can produce only an individual outcome but do not threaten to disrupt the wider system.

[p12, para 5] The text sets a number of propositions, which are assumed are self-evident to the audience (greater assurance, 'recognition of the variation in levels of

attainment', 'the maintenance of the value of a degree', within a frame of markets and pursuit of perfect information in a market as the way that those propositions are achieved. the notion that the value of a degree awarded 'remains the same over time' equates 'value' with 'standardised classification of degrees'. It removes the actor (value to whom?) and in doing so asserts its own definition of value. If the identity of the actors is unpacked, the notion of value remaining the same over time is revealed as more ridiculous. If for example an employer is seeking possession of a degree certificate as a recruitment heuristic to indicate that they are shortlisting the most academically able 10% of the population, then the value of a degree decreases as the supply of graduates reaching the standard increases. If, however, the employer seeks possession of a degree certificate to indicate a demonstration of a level of knowledge or skill, then its value may be the same over time. In both situations there has been no change in the standards of the award, simply more people studying for them or attaining them.

[p12, para 6 header] There is a looseness with terms in the concept on 'standards'. Standards are usually used to describe agreed consensus over minimum benchmarks of performance expected and in higher education discourse have a technical usage in a distinction between standards and quality - the former being set expectations, the latter being how well they are met. Here 'standards' appears to be being used in the sense of 'norms'. It might be argued that this word meaning assists with the case to enable new private providers of HE to do so. The dynamic verb phrase 'driving up', associated with speed and purpose, provides cover for what can be argued is a re-definition of 'standards' and of approaches to achieve 'quality' which, shaped by 'incumbent' universities, defined 'standards' in their own image, meaning 'the way we do things'. There is a clearly a more in depth study of how notions of 'standards' and how they are set, within what structurings, which could be undertaken, but which is not the focus for this paper.

[p12, para 6] Word meaning - 'variable' in this context is intended as a simile for 'poor', particularly with the sentence that follows it, as opposed to an alternative treatment which would say that it was common sense that in surveying four hundred thousand learners, their assessments of quality would be 'variable' on a five point Likert scale. Again, this is pseudo-research: the reference does not point to anything substantiating the key claim in the paragraph - that more than half of providers performed 'significantly below expected levels in at least one element of the NSS.'

[p12, para 7] This is a form of interactional control by posing as the solutions to a complex problem as being simple choices of single variables between two things - research and teaching, and recognition for each, with the assumption of casual relationships in the one applied to the other. The factors leading to a greater focus on research in research-intensive universities are far more diverse and their inter-relationships more complex. The phrase 'undoubtedly required' continues the preparation of the reader for accepting a simple 'two variable' problem, despite having no logical or empirical basis: excellence of one activity does not preclude excellence in another, regardless of the scale of each, and the two may or may not be causality related in any way whatsoever. This is also an example of the subtleness of the policy discourse in the text in relation to the priorities of the

Russell Group. This may be due to conscious shaping or sub-conscious acting of the habitus: the background on the writers and ministers, whose experience of university was in such universities, or an acceptance of the political power of the Russell Group institutions which makes direct criticism a riskier proposition. Instead, here, the actors (research intensive institutions and their research-focused academic staff) are removed from the sentence, and the issue presented in the abstract as a (rather muddled) metaphor of 'pulls' and 'balance' between two abstract verbs ('teaching' and 'research'), so the critique is made but without those responsible being identified.

[p12, para 8] Connection to the Conservative Party manifesto, on which the Government was elected creates an inter-textual legitimisation of the proposed measure. It asserts, (not unreasonably in a democracy) that having been elected on this basis, it has a right to put legislation to deliver it. The framing of the legitimate argument here is therefore around the definitions, scope and operation of the TEF.

[p12, para 8] There are many unevidenced findings in this statement, which presents the TEF as enabling good choices, by implication more 'perfect' in contrast to the 'imperfect' ones made by employers currently. It is a notion of market mechanisms in which a. choice is desired and an effective way of driving up quality and b. that a greater quantity of 'the right' information maximises utility by improving the quality of choices. There is counter evidence that suggests many prospective students do not use information of this kind and that those there are lower levels of usage by prospective students from families from unskilled and skilled manual working backgrounds, inviting a hypothesis that some may not actually 'be able to use' such information in their decisions or at least a question about why some do and others do not. This phrase is assertive in making the case for this change. The language is emotive, with powerful verbs 'value' and 'trust' introduced, and says that the TEF 'will' achieve these things. This is arguably a bold claim for what is only a publication of a judgement based on evidence sources dividing providers into three categories. This ascribes to providers the role of 'producers' of highly skilled graduates and again distils very complex social, economic, academic, and cultural processes into a simple set of choices and mechanisms.

[p12, footnote] The reference here points to a page with a rather different headline message: Student satisfaction remains high at UK universities and colleges

The satisfaction rate for students studying at UK higher education institutions (HEIs) and further education colleges (FECs) remains high with 86 per cent saying they are satisfied overall with their course in this year's National Student Survey (NSS). A further 7 per cent were neither satisfied nor dissatisfied with their higher education experience; and only 7 per cent were dissatisfied (5 per cent) or strongly dissatisfied (2 per cent).

[p13, para2-3] These paragraphs set up a feature of New Public Management familiar to many interested parties - regulatory mechanisms with criteria, incentives, and assessment of outcomes - and something with which they can easily engage.

[p13, para 4 heading] Boosting social mobility has been a widely accepted goal of meritocratic social democracies across the NPM period over the last 30 years. All political parties claim to agree with it and so it prepares the reader for a set of statements they are expected to agree with.

[p13, para 4] Here, HE policy is set within a wider political construct (One National Conservatism/Government) which purports to preside over a meritocratic system that provides open access to opportunities for those who demonstrate 'talent and potential'. It is unclear who or what the Government is 'pushing', but it makes assumptions implicit that there are individuals who have demonstrated talent and potential, and institutions that are denying access, diverting the reader away from consideration of other possible systemic causes over which the individual has little control.

[p13, para 6] This paragraph reveals assumptions about different types of institutions which fit with a meta-narrative favourable to research intensive institutions. Global league tables measure research quality and impact. It is saying: our research universities do very well here, and despite not being a good proxy for value in teaching, are probably really a good proxy, because 'we must also ensure that we drive up the quality of teaching...in the providers across our higher education system who are actually responsible for boosting mobility for the vast majority of tomorrow's graduates'. So, the providers who educate the majority, are by implication not in the world rankings, and are in need of having their quality improved.

[p13, para 8 heading] The emotive 'fairer deal' is used in a sub-heading that is supposedly universal (covering both new and existing providers) but which in the section that follows includes no mention of nor measures to benefit 'existing providers'. The sub heading of 'existing providers' becomes, in the text, for the first time 'incumbent providers' the anonymous villains of the old HE system.

[p13, para 8] This paragraph displays many of the features of persuasive discourse: 'New providers' are, through their collocation with 'innovation', 'diversity', 'international reputation' and 'highest quality university experience' implicitly connected with them, and explicitly with 'attractive', and 'serving those not well-served', and as having a 'key role' in 'improving their [sic] efficiency of the sector', the latter point creating an inter-discursive link with notions of 'private good-public bad' familiar in small state conservative discourse. There is no evidence presented that new providers 'do' do these things. The marketised discourse is explicit with assumptions that it functions effectively and is perfect ('more choice between providers means that students can demand more value for money for their tuition fees.'). 'Diversity' is also changed from its commonly used and widely accepted meritocratic meaning with reference to learners or applicants, to be about 'diversity of providers' of which there is no consensus.

[p14, para 1] The theme of 'a level playing field' is used to signal common sense sporting analogy - who would want to play sport on a sloping playing field? 'The barriers to entry are significant' could equally have been phrased 'the standards that new providers must meet are high'.

[p14, para 2] Interesting that a 'renewed focus on quality' is only 'envisaged' signalling the important feature of the proposals are to facilitate the entry of private providers. The metaphor of 'the public purse' is introduced here using personification to encourage the reader to see government finance of education like a person spending their own money on goods that people are used to buying from a range of vendors - private and public. Note 'providers' have now become 'high quality providers'. The document is clear that there are 'unnecessary' barriers as opposed to the less assertive 'any unnecessary barriers'. The relationship between value for money and removing barriers to entry are subtly established, suggesting that the two are connected when evidence at that point (from an NAO report) showed that the new providers offered the very poorest value for the taxpayer.

[p14, para 3] This paragraph asserts the application of market logic to HE. After the common sense statements about 'single routes' and 'speeding up processes' - both commonly believed to be good things, the next sentence is assertive in its implicit assumption that competition in HE is the natural order, that an 'anti-competitive situation' is clearly one that Government must 'address', going on to describe that situation in value laden adjectives 'incumbent provider' and personalise the issue, presenting it as a means to prevent students from accessing support. The logic is extended by the characterisation of the role of Government in the new HE system as protector of students.

[p14, para 4] 'Simpler' and 'more effective' are implicitly connected here. The meaning of the word 'diversity', something widely accepted as a positive thing within the audience for the Green Paper, is altered here in order to suggest that the proposals are consistent with the values of the audience and secure support and acceptance. The meaning here in the Green Paper is 'diversity of providers' - competition for established universities and colleges from private for profit operators - as opposed to 'diversity of participants' in higher education. This statement asserts a relationship (a 'need to reflect') is required without clarity of the actor ('the system'), or of what such 'reflection' means. It goes on to present the existing system as anachronistic (something 'designed in a very different era', with the implication that it is no longer appropriate for the present or future). The verb on the Government's action is active and bold ('to transform'), uses metonym ('heart' as opposed to 'centre') and personification to make the distribution of funding for education a matter of putting real people ('students') at the centre of a living organism (with a heart). It concludes with a familiar phrase that might be regarded as common sense (to make something 'simpler and more effective'). An assertive statement where the vagueness of the prescription 'to reflect the reality of today's...' reinforces a 'common sense' narrative.

[p14, para 5] Simplification as a policy argument here. Direct reference to the 2011 white paper that was not implemented due to disagreements within the Liberal Democrat/Conservative coalition government.

[p14, para 6] The paragraph speaks with considerable certainty about the benefits to all parties of the proposed reforms in regulation of HE, although they do (properly) use the term 'would' rather than 'will', given the Green Paper is for

making proposals not setting definitive direction. They do not however say 'these proposals aim to...' and as such are relatively confident and assertive.

[p14, para 7 heading] Simplification ('reducing complexity' is put forward as a 'common sense' proposal.

[p15, para 2] This section adopts a very different style and lack of lexical cohesion with the rest of the document. The language is legalistic and procedural and the sentences and paragraph longer (the longest paragraph in the document so far). Public bodies are required by law to carry out an Equality Impact Assessment of proposals they make and this paragraph makes explicit reference to that obligation. The differences in written style also signal that this is not part of the main argument of the document: indeed, it may itself have been written by a different author.

[p15, para 3] The Green Paper puts the word 'relevant' in inverted commas. The original text of the Act includes no such marking. The subtle impact of this change is to suggest that 'relevant' is the key term in the clause, the meaning of the word is changed to de-emphasise the suggest that some protected characteristics may not be relevant to the situation in question. Arguably the meaning in the original (without grammatical markup) is to give emphasis to the defined protected characteristic that applies (is relevant to) the people in question, not that some of those protected characteristics are not 'relevant' in themselves to a public body in its exercise of its equality duties.

[p16, para 1, Question 1] This first question adopts a politeness approach that is open, inviting an expansive response. Respondents are invited, in relation to the topic of equality impact, to express any views about the impacts of 'the proposals' as well as 'any other plans'. Further in part b to the question, it asks if there is anything further the respondent may wish to add, again in relation to equality impact only, that has not been considered. It even goes on to request the respondent provides 'any further relevant evidence'. Clearly the author is prepared to receive on this area and adopts a form of interactional control in the form of the question in inviting expansive responses and the provision of further evidence.

One might also consider the issue of time at this stage. It is likely that the time available to respondents to Government consultations, even professional policy actors, is not infinite. If the respondent in fact has a finite time to make a policy response, it is possible to influence the emphasis of their response by the ordering of questions and sections and by the politeness strategies employed in the consultation questioning. To ask an open question, early in the document, on a topic of little policy importance, can serve to absorb time of policy actors responding to the consultation and divert their attention away from those topics dealt with later in the document. This is a theme that will be revisited later in the analysis.

[p16, para 2-3] These paragraphs (42+43) are almost dismissive of this recent piece of Government legislation. It suggests a cursory rather than deep exploration of the issues which may be read as 'We can't think this applies to this legislation but if you think it might do, let us know.' It does not take any deep research to understand that HE participation, and a 'widening' of it to groups and people under-represented can have significant implications for families and people within them,

changing, for instance, the identity and power relations between husband and wife when the woman returns to higher education as a mature learner - something the policy purports to encourage.

[p16, para 3] Here the paper explicitly equates 'institution' with 'provider' whereas the meaning of those terms would be rather different in both their etymology and present day meaning. 'Institutions' represent longevity and societal purpose. The term's use in higher education signals the significance of the organisations entrusted to provide that education. Closely equated with the universities that make up the majority of higher education institutions, the legal right to award qualifications and the legal limitations over the use of the word 'university', the term 'institution' is imbued with significant layered meaning. These too can be seen to be reflected in the expectations of such organisations in their conduct and values, as reflected in the QAA's quality code.

The term 'provider' relates to a transactional relationship of services supplied and received. It is part of a marketised discourse of supply and demand in services. To use the terms interchangeably as the paper says it will do, creates an equivalence between those organisations that are recognised as 'institutions' and those that are 'provider'. This is deliberate as the Green Paper intends to introduce stronger market forces within HE and to reduce higher education to a level playing field of service providers, where established 'institutions' and new entrant profit-making businesses delivering services are regarded as the same. While this is part of the message from a surface reading of the text it shows how discourse technologies are used to reinforce the plain text to enrich those texts as power discourse.

[p16, para 3-5] This section ostensibly defines a wide range of people or organisations to whom the consultation may be relevant. The definition of those organisations and people does serve however to define the identities which the writer believes are of relevance and thus asserts interactional control through influencing the reader as to which identity they should adopt as reader. Organisations and individuals will likely have multiple groups or labels that they identify with, providing lenses to view the proposals through. Through specifying it as 'relevant' it foregrounds the importance of identity as 'employer' and 'student', as opposed to 'business' and 'citizen' for example.

[p17, para 2] This is a form of interactional control, managing the expectations and contributions of readers by signalling an awareness that primary legislation may be required and that this does not represent an impediment in ideational terms.

Part A: Teaching Excellence, Quality and Social Mobility

Chapter 1: Introducing the Teaching Excellence Framework

[p18, para 1 header] This is an inter-discursive reference to the Research Excellence Framework, a feature of peer-review and regarded by many as contributing to the primacy of research over teaching in status terms in HE. It is also a form of words and theme that are comfortable for the reader, whilst the proposals themselves may not be regarded as optimally progressing these agenda, or even hindering them.

[p18, para 1] The inter-discursive connection and explicit reference to prior policy text and practice by the previous Conservative/LibDem coalition government seeks to legitimise the proposals through emphasising continuity. The vagueness of the last sentence serves to present the prior reforms as positive. Who are the 'providers' given the opportunity to grow? This is arguably a reference to private provider growth, as this was most significant in this period, but the sentence equates 'providers' with 'the sector'. The sector is not defined, but arguably refers to the established sector. This eases the reader into acceptance of the argument using the narrative of continuity of accepted and normalised practices. The word choice to describe the reforms of the previous administration is interesting. It presents the reforms as 'opportunities' for 'providers' and 'students', inviting the assumption that the logical response to an opportunity is to take it, or respond to it. The reforms in question included, it should be remembered, the most controversial increase in tuition fees credited with significantly undermining the popular vote for the liberal democrat party in subsequent elections. It sparked violent protest which saw at least one protestor receive a lengthy prison sentence. Many would not regard an increase in the fee paid by students from £3000 to £9000 as an opportunity to be taken.

[p18, para 2] This inter-discursive element references the 'unfinished business' of the Coalition Government. The narrative both seeks to present continuity with this early policy but also to suggest that that Government and the Government proposing the Green Paper is responsible for making improvements to the HE system. This passage asserts two beliefs without evidence that either 'providers offering the highest quality courses are recognised' or that 'teaching is valued as much as research'. This is an example of nominalisation, where the passage is silent as to 'who' is doing the recognising or valuing. It goes on to assert student 'expectations' and employers' and 'taxpayers' 'needs', without reference or evidence.

[p18, para 3] This adopts a confident tone about the outcomes of the proposal, stating definite outcomes of a single policy instrument - the Teaching Excellence Framework. These outcomes might more accurately be described as aims but are not stated as such. The means to their achievement (the TEF) is also put forward before the aims, rather than emerging logically from it. The text that follows lays out a number of familiar and popular themes, having already stated that the TEF will deliver these things. The 'aims' are part rationale for change, drawing on themes in the sector discourse popular with many throughout the NPM period: meritocratic equivalence between academic enterprise in teaching as well as research, 'parity of esteem', the purpose of HE being to provide high skilled labour for the knowledge economy, the rhetoric of greater assistance for the disadvantaged, and the meritocratic argument for provision of greater rewards for greater achievement.

[p18, para 3, bullet 1] This statement demonstrates the inoffensive intentions of the proposals. After a headline of 'incentivising the highest quality teaching', and intentions to 'drive up standards', the first aim is only to 'place a spotlight' on teaching and 'encourage excellent teaching for all...'. One might have thought it would aspire to go further than mere encouragement. No 'ensure that' here - the

proposal is measured, with the intention of being accepted. There has already been 'a spotlight' placed on teaching since the NSS and league tables made it an important factor in reputation and hence revenue generation.

[p18, para 3, bullet 3] The action orientation is non-confrontational, with a tone of co-creation in helping to 'build a culture'. It is also a safe statement to secure agreement: survey data shows that the majority of academics believe that teaching and research 'should' have equal status. The paper is silent on the ways that difficult matters of such parity are achieved through action, which is largely absent from this paragraph. It avoids engagement with the debates over what mechanisms contribute to the differences in status between research and teaching in universities.

[p18, para 3, bullet 4] This is a familiar belief of the advocates of marketisation - that if as close to perfect information is made available, one moves towards a perfect market, matching buyers and sellers effectively. The tone is again conciliatory however: 'support and stimulate WHERE POSSIBLE, the sector to help students meet their aspirations. This is not the discourse of enforcement, regulation and compliance, but the more familiar, and vague encouragement drawing on an assumed interest in the desire of those within HE institutions to help students. Further, in considering the transitivity, the use of the term 'sector' analyses the actions and power relations at such a level of abstraction as to de-emphasise the notion that any individual readers may be required or prevented from doing anything: that no power is to be exerted over them, making the policy more acceptable. Again, this restates as new a level of public information that has been the norm in English HE for over a decade.

[p18, para 3, bullet 6] The verbs in this paragraph are again inoffensive and signal no increased level of control: 'recognise institutions', 'welcome students', 'support [students]', 'help [students] to progress'. To avoid the suggestion of any significant change to the status quo, there is no suggestion that such institutions that do these things well will be rewarded in favour of those who do not.

[p19, para 1, bullet 1] Again, this paragraph only 'reflects the strength that comes from diversity' rather than takes any particular action to address any inequalities. Here is the start of an elision in the use and meaning of the words 'diversity' and 'difference'. The prior discussion has discussed [arguably extant] institutions and the value of the work they do to support students from a range of backgrounds to succeed - diversity in this sense conjures in the mind of the reader the notion of a diverse student body. The paragraph may be read to mean that flexible approaches to learning and teaching helps achieve excellence for those diverse range of students. The vagueness of the word 'sector' here is key. It is proposed that the intention here is to begin the justification of greater access to the HE 'market' of private for profit HE providers.

[p19, para 2] This concluding paragraph reasserts the market theory, without evidence, that the TEF will create new information to inform the decisions of consumers in the marketplace that, it asserts, will result in increased demand for higher quality (as signalled by the TEF). lower TEF quality reducing demand until quality is improved, and persistent 'lower quality providers' withdrawing from the

sector, to be replaced by high quality providers who can compete effectively. It acknowledges, but neglects to consider the implications of, the fact that the market for students is a regulated one, where supply and price both operate with capped levels. The passage is addressed to existing providers, arguably the primary audience for the TEF section of the Paper. The marketised paradigm is discussed, but the benefits of the market for existing HE institutions are withheld- the reward for high quality is described as bringing 'additional income that can be reinvested' yet the proposals limit potential rewards to not seeing the price reduce in real terms. At this stage no proposal is made to lift the restrictions on existing providers expanding their student numbers. There is therefore no price incentive and no incentive to allow increase in supply which might reap economies of scale. This is in stark contrast with benefits to new private sector entrants from the Green Paper proposals which see a rise in maximum fee of in excess of 50%.

[p19, para 3] The only rationale presented for the TEF is economic. No attempt is made to consider other outcomes from HE in the rationale for strengthening markets for allocating resources in HE.

[p19, para 5] This uses the grouping of three points with alliteration, but makes no reference to support the assertion of choosing being hard or it being improved through more data. It is followed by a statement whose collocation suggests a connection between the two sentences, though none is demonstrated.

[p19, para 6] This section adopts the form of an academic paper, with footnotes to evidence supporting assertions in some places. This is one of a number of examples where the footnotes do not in fact support the assertion. In this case the paragraph finds that 'the Association of Graduate Recruiters (2015) found that...' suggesting that there is a publication or report by the AGR published in 2015. The footnote (14) is a reference to another author - the NCUB, from 2015. The reference is in fact to a blogpost on a webpage in 2014. The reference to the AGR in that article is a link to an FT article in 2014 which does not make reference to an AGR claim of 25% of employers. The article does find that there were employers reporting skills shortages in 25% of roles, but for technicians. The use of this 'quasi-academic' writing represents power discourse in that it is supposed to project authority for what is in some cases mere opinion.

[p20, para 2] This section references a text that was central to the key policy text of the previous coalition government, 'Dimensions of Quality', manifest inter-textuality. This paragraph, now speaking specifically about universities (not 'HE providers') and the prior paragraph 9. on page 20 are tentative with its comments about research universities. This perhaps recognises the power of those organisations and the desire on the part of the authors not to rouse them to virulent opposition. It may also be the product of the habitus of both the civil service and of policy development where most actors will have been educated in such institutions and so are predisposed to a belief that these organisations are not the ones that Government wishes to change the behaviour of. Indeed, when the TEF resulted in some research intensive institutions not securing the two highest grades in the scoring and judgement exercise, the criteria were changed for the following year, favouring the research intensive institutions.

The sentence employs nominalisation to weaken the force of the argument - it moves away from talking about universities who have failed to deliver quality in education to students to talk about abstracts of 'teaching' being a rather nebulous role within a family 'the poor cousin', deploying informality and personification, and locates that activity not 'in certain research intensive universities', as seemed intended, but in parts of 'our system'. The use of the personal possessive pronoun again softens the force of the argument.

[p20, para 3] The weakness of this paragraph, which almost suggests that there is little problem in the sector and all that is required is a little more discussion with students and dissemination of good practice, reinforces the tentativeness of this section of the Green Paper. It is designed not to be threatening.

[p20, para 4, bullet 1] It would appear that the authors use the form of logical argument, without the necessary connections between the different elements. The paragraph takes the form 'statement of a problem; evidence source to support it; proposed action to resolve the problem. The evidence does not logically connect to the action proposed to resolve the 'problem' that is asserted. Here, research findings report that student satisfaction is the most important information desired by HE applicants to inform their choice. This information has been gathered since 2005 in the National Student Survey. The proposed action relates not to more or more precise data about satisfaction, as preferred by prospective students but to 'objective' measures of the quality of teaching, defined by an expert quango, the Office for National Statistics. This form of discursal argument represents an interactional control, encouraging acceptance of the action because of the form of argumentation.

[p20, para 4, bullet 2] Again, the common form of problem, evidence, solution is used, but with little connection between them. The references are misused and misquoted and the final diagnosis - that there is a need for measures of 'teaching excellence' - does not logically follow from the evidence that preceded it. The reference quotes HEFCE commissioned research as stating that it found HE provider websites to be 'variable in terms of 'accessibility' and how well they reflected the type of information students need and prioritise.' The research in fact studied the information that another Government quango, the Competitions and Markets Authority (CMA) defined as being requirements of HE providers charging fees for services with no reference to the information that students prioritise. The second evidence quoted describes three priorities of students surveyed: having more hours of teaching, better trained lecturers and smaller teaching groups. It states that 'little information on this (sic) is provided for prospective students.

It then jumps to say that league tables do not 'seek to measure teaching excellence' (it should be noted that current UK league tables do not seek to measure anything, but use existing publicly available measures, in different combinations, to present a picture of the experience at a particular university), as there have been only 'imperfect proxy measures' of 'teaching excellence' to date. The collocation of features that students prioritise (but interestingly did not necessarily express an interest in having information about), in this paragraph suggests that 'teaching excellence' and these student priorities are in some way related. If they are then they would potentially represent the very 'imperfect proxy' measures that are

critiqued and provide the supposed rationale for the TEF. No evidence is presented to support the final statement, which is tentatively prefaced with the term 'can', but claims student disappointment, poor value and poorer return for the economy. None of which logically flow.

The authors choose to use the form of logical, evidenced argument even in the absence of evidential basis for the conclusions. Inductive reasoning is presented as deductive; policy-selected evidence is presented in favour of evidence informed policy. It suggests policy actors who know the form of policy discourse and pursue it for presentational purposes to support arguments or solutions rather than as an objective process of truth seeking as the policy process is often presented as.

[p20, para 5] Overt criticism of research intensive universities is again avoided here. The statement is arguably designed to make a number of readers conclude 'they don't mean us; we are not going to need to change' by the qualifying sub-clause in parentheses because all can claim that there are connections between teaching and research.

Diversity here again is used to mean 'bring new private providers into the pool of providers' but masks its meaning through reference to 'greater diversity IN PROVISION' which potentially means existing providers responding to their 'customers' and stakeholders and providing different things.

[p21, para 1] The paragraph summarises not just the TEF but the Government whole view about how the graduate labour market should function and the role of education in influencing it. The essence of the argument is that good quality teaching leads to productive graduates who pay more tax and make a big impact on the economy. It also claims that the TEF information will enable better employer choices. The research commissioned by the Burgess Group that look in depth at the information that would assist graduate employers in their recruitment is not referenced. It found that the recruitment practices of many employers of graduates were so inexact that they were unlikely to use improved sources of information, with another group, with rather more advanced practices, using a more holistic assessment of suitability tailored to the needs of their individual businesses.

[p21, para 1, question] This question adopts an approach to politeness that is not assertive, though does lead the respondent to acceptance of the premise that information from the TEF 'CAN' be used to better inform student and employer decision making - by asking how it can, rather than whether it can. Curiously it asks respondents to 'quantify' these benefits. The document does not lead the respondent to the conclusion that any such benefits CAN be quantified, so the request to 'quantify' may add complexity to the task of responding and hence time to answer the question as asked. It does however again invite an expansive response, with a broad question of the 'decision-making' of two heterogenous constituent groups.

[p21, para 2 inc. heading] Here the paper engages in a discussion about the meaning of teaching excellence. Of interest here is not the precise definition adopted but the breadth of what is possible to consider (even with the 'principles' that it says inform Government's approach) and the limits the paper puts on its

legitimate scope. It introduces many variables and perspectives for consideration, providing little sense of a policy object that is being sought.

[p21, para 3] 'Our intention...over time...' indicates a deemphasis on terms of urgency. These measures will be introduced slowly. It also chooses to co-locate the point with an acknowledgement of the lack of competency of the Westminster Government over higher education matters in the Devolved Administrations, noting that discussions will be held as to whether others wish to be involved, again signalling the lack of urgency. This references private providers of HE using the term 'alternative providers', as has been the discourse since the Coalition Government. It also makes a rare reference to FE colleges which are significantly overlooked in the document as providers of HE.

[p21, para 4] A broad vision is proposed for the TEF, with few specifics. The breadth of the intent is somewhat de-emphasised by the concluding sentence that acknowledges the proposals have not been scoped fully ('We are exploring the implications of this further, and some of these proposals may only be brought forward with legislative change.').

[p22, para 2, question] This question invites agreement with a proposition, but not in forceful terms. The use of the phrase 'open to all...' suggests liberty and inclusiveness. Respondents are invited to speak at length about the idea.

[p22, para 5] There is a lack of lexical cohesion here, with the paragraph attempting a condensed and complex argument about the relationship between price sensitivity in student recruitment markets, incentives to providers and the impact of disadvantage. Ethos-wise it repeats the theme that Government is concerned about improving the applicant rate to HE. The sentiment is familiar but the public information about outcomes achieved for different disadvantaged groups is weak.

[p22, para 5, question] The question raises open questions, caveated, which invite clarification from users. 'Where relevant...' The text assumes the agreement of the reader with the ethos of the question and signals a willingness to receive suggestions as to how to do it - supposedly the purpose of a Green Paper. From a policy power perspective however, it draws attention and time to the question - a question over which there is little controversy at a principle level, inviting attention to the operational level that is of lesser policy consequence.

[p22, para 6] This sentence attempts to signal that some elements of the policy proposals are non-negotiable 'already ...announced...' and 'we are clear that...' and so should not be the subject of attention from the reader. The points appear in a quasi-hierarchy, with points of importance first then a chronology of what will be applied at which point. It is interesting to note that the second matter - the provision of financial incentives to providers for success was quickly removed, questioning whether it was that important to Government or that central to what it wished to achieve with this piece of policy. The real purpose of the TEF elements of the paper are discussed in greater depth in a later section.

[p22, para 6, bullet 2] It is interesting to note the assertion that 'TEF levels WILL offer [reputational] incentives...' The sentence mixes something in the Government's control (the provision of financial incentives) and something out with

its control (the reputation of providers of HE in the minds of 'customers' and stakeholders. In discourse terms, their collocation can serve to strengthen the author's claim for the TEF in the absence of evidence of the claim.

[p23, para 1, bullet 3] As will be seen later in the paper, the financial 'incentives' for private providers to join or continue in the HE sector are in excess of 50%, plus the inflationary incentive offered to existing providers.

[p23, para 2] These are typical New Public Management questions for HE policy.

[p23, para 3] Again, classic NPM themes for the policy consultation of how to use competition, public information, incentives, penalties and metrics to influence provider behaviour and serve Government policy.

[p24, para 2] The use of the word 'mirror' encourages the reader to expect, and to normalise, the same treatment of private providers of HE as established universities, as one expects to see a replica in the 'mirror'. The provision to allow private providers to have 'equivalent' uplifts to the fee loan cap suggests that the rewards will be equivalent for established providers and private providers, whereas the term 'equivalent uplift to the fee loan cap' in fact means that the loan cap is at an equivalent level. The uplift is very different by a factor of 25.

The FE college providers (up to the point of the Green Paper the principal 'alternative providers' to universities, are included as a postscript, with the positioning of the sentence in the paragraph and the use of the word 'also' emphasising this point. They are not seen as providing the alternative to university provision.

[p25, para 2, question] The paper does not actually specify what the incentives will be for alternative providers - there is a vagueness, with reference to later sections in the paper (while the question is posed at this stage). The question is framed not seeking a response to whether incentives should be open to alternative providers but asks about which type of incentives should be provided. It asserts in the form of the question that incentives are things 'that should be open to alternative providers...'.
Open responses to this technical NPM section of the Green Paper are sought, inviting respondents to give reasons for their views. This also serves to give the impression of weighing reasoned arguments for and against the policies proposed.

[p25, para 6] The paper uses the term HEIs (Higher Education Institutions) here. This aligns more with established providers of HE. The previous paragraphs have talked almost exclusively of 'providers'.

The emotive statement 'students rightly want hard work...to be recognised' is not referenced. It is assumed as common sense that this is what students 'want' and that this is a righteous desire. It is also the first appearance of in the paper of the division between the deserving and undeserving student, with parallels to a view common in Conservative Party thinking of the deserving and undeserving poor. For the Government, students are 'right' when they are interested in the recognition of their hard work. They are viewed negatively when they organise as consumers to

assert their rights through collective action in students' unions and as bodies whose powers should be restricted. This is a theme that will be revisited later.

There is limited evidence (and none presented) that businesses 'need' a degree classification system 'that will help them identify the best applicants for their firms' - this is asserted as part of a common sense view that HE should function for the benefit of businesses who make no investment in HE rather than the students who are the customers. The rhetoric emphasises the proposals as being in the interests of the student, whilst assuming that designing the system in favour of business is the purpose of policy. This is therefore less about a marketisation but more an HE system designed in the interest of capital over labour in that market, with consumerism as a tool only where it serves the interests of capital.

[p26, para 1] 'Hardworking students' reinforced again as the students with a legitimate claim for Government policy action.

[p26, para 2] he 'undeserving poor' of the student population, posed in contrast to the 'hardworking student' is the 'coasting student', although in this instance this is only implied ('...also permits some to coast.'). In reforms designed to make customers king, one might think that the choice to coast was something customers had the right to pay for. This is a Conservative Party educational trope, applied in the schools sector to describe schools that had been graded Ofsted 'requires improvement' for longer than three years.

[p26, para 4] The purpose of a Grade Point Average scheme, participation in which is 'encouraged' (suggesting a limited commitment from Government to achieving), is assumed to 'encourage consistent effort from students.', presumably to discourage the workshy.

In the absence of survey data representative of students' views, this unreferenced statement claims that anonymous 'students have told us...' with the impression of Government talking with individual students, a personification to cover for lack of evidence.

[p26, para 6] Continuation of the theme of the hardworking student studying hard for 'hard won degrees' as justification for proposed reforms.

Chapter 2: Assessment process, outcomes, and incentives

[p27, para 3] This paragraph highlights the continuity of marketised discourse and paradigms that have grown across the NPM period. The Green Paper seeks to continue that process by linking proposed rewards and recognition in the TEF to compliance and adoption of marketised discourse by HE providers, following the Competition and Markets Authority intervention.

[p27, para 4] The consumer paradigm for governing the relationship between student and university is posed as unproblematic and not up for question, though would appear to be a paradigm not wholly accepted by the established HE providers, as evidenced by their low levels of compliance.

[p28, para 1] The dominant modality for the propositions in this section suggest a low level of concern for the way that the policy might be implemented: 'Our preference is...', 'We think...', 'We are proposing...', 'We envisage...'.

[p29, para 1] Further references serving to de-emphasise the importance of the proposals, with open invitations to challenge and a lack of definite commitment to the proposals.

[p29, para 1 question] All elements of this previous question are up for question. Respondents are invited to provide reasons as well asserting interactional control

[p29, para 1, question 2] A common theme in NPM in HE in the preceding two decades was the desire of the universities to see the 'administrative burden' of having to report to government reduced if not eliminated. The strength of the notion of institutional autonomy for universities has meant that even in an era where universities had been in receipt of significant quantities of public money, the 'interference' of the State has been seen by many as illegitimate. A more technocratic policy implementation argument was also made: that in distributing public money, the administrative overheads associated with that distribution should be minimised. From 2000 [check date] Government and its agents such as HEFCE were even required to carry out regulatory impact assessments to measure the costs of regulation to weigh against any policy benefits.

This notion is continued in this document in this section, exemplifying the continuity of NPM discourse. The sentence form takes as a given the desirability of minimising administrative burdens, asking 'How can we minimise...' as opposed to 'Should efforts be made to minimise...'. It is argued this is deliberate as a question likely to be well received by the university readers of the document. Respondents are invited to spend a considerable amount of time on the question with requests to 'provide any evidence relating to the potential...costs and benefits...'. Arguably the proposals, particularly with their speculative planned further development to create a TEF system operating at subject level create significant additional burdens.

[p29, para 4, question 1] Open question asking for reasons for agreement or disagreement.

[p29, para 5] The avoidance of a source for the vague claim that Government has 'heard from the sector' that 'they' expect the TEF 'will offer', 'significant reputational advantage' and help recruit students from both home and internationally. Given the majority of the data upon which the TEF was expected to be based upon were already in use by commercial producers of university rankings and hence already influenced institutional reputation, this claim would appear to represent a significant leap of faith and a view that it would be unlikely many if any universities would commit to without empirical evidence.

The use of the word 'drive' in association with changing the behaviour of a target group is quite assertive. Note that 'provider' is used in favour of 'institution'.

[p30, para 2] After noting that the current system has different regulatory arrangements for established and 'alternative' providers, the second sentence assumes as 'common sense' that alternative providers 'should have access to a financial incentive for excellent teaching.' The point is reinforced through the term 'alongside all other providers,' The word 'alongside' suggesting equality, parity and 'standing side by side'. The Green Paper is interesting in that it does not attempt to present a rationale as to why private for profit providers 'should' be treated the

same as universities and publicly funded colleges, which might logically precede or follow a claim that there is a need to change current policy. Instead, the 'common sense' discourse technology is used.

[p30, para 3] The preceding paragraph establishes through assertion that alternative providers 'should' have access to a financial incentive. This paragraph uses discourse to show that the proposals that follow are the logical conclusion of the preceding proposition, with the phrase 'We THEREFORE propose...'

Having established the unsubstantiated claim that private providers 'should' be incentivised financially, the lexical device of using 'either' narrows the choices of legitimate options in the mind of the reader to two - both of which are now about how incentives should be given, not whether they should.

[p30, para 4] Continuing the logic of the discourse following the statement that incentives 'should' be provided, further options are introduced, both of which again involve significant financial gains for private providers. This section is however curious. It refers to a later recommendation in the Green Paper, the fundamental section relating to the entry of private providers to the sector but does not use assertive discourse. '...IF we introduce the single route into HE...'. It could have used alternative wording here such as 'We intend however to introduce the single route into HE...' and then use 'THEREFORE...' to suggest the logical sequence of events. An alternative reading could be that Government was intent on giving public funds to private providers and the proposals at para 20 were an insurance option, ensuring that if the proposals that (this thesis argues) represented the paradigm shift in HE policy were resisted so strongly, then some open ended form or mechanism to provide funds to private sector bodies would still be needed. It is interesting if this reveals a consciousness of the significance of the attempted changes, but lack of confidence in whether it could be achieved in the policymakers.

[p30, para 4, bullet 1,2] These are the first explicit reference to the level of funds that private providers could gain access to. It is framed in terms of parity and equality of treatment between 'all eligible providers' and is not explicit about this applying to only some providers (with the others - 'HEIs' - already having the right to charge fees at the level specified, rather suggesting that all providers have choices between two options.

[p30, para 4, question 1] The question, as with all in this section, is open and invites reasons to be provided to support the argument. The question asks about 'the proposed approach', i.e., the method rather than the principle, of financial incentives, avoiding that more fundamental question. It asks about approaches taken to 'the different types of provider' which proves complex to answer due to the discourse used in the preceding paragraphs which attempts to propose that all providers should be treated equally. Further education colleges (as opposed to private providers) are not mentioned

Chapter 3: Criteria and metrics

[p31, para 1] The criteria should be 'Straightforward' and 'easily understood'. Whilst this is an admirable aim, the proposition that complex measures of teaching excellence can be made to be straightforward and easily understood as a result of

policy is a technique that it is argued should be recognised as a discourse technology in Fairclough's analysis: simplicity. Presenting complex situations as soluble through simple policy measures should be subject to particular critical scrutiny. It is recommended that further research might test this proposition and establish the reasons why it may be effective. Whilst a thorough review of the literature in relation to decision theory or behavioural psychology is beyond the scope of this thesis, there is some literature that suggests humans, when faced with complex choices, will tend to seek alternative, simple choices, or heuristics, which they find easier to understand. Policy actors can therefore use this mechanism in discourse to gain acceptance for a policy

[p31, para 2] It is interesting to note (at c1, para 12, p20) that the league table reliance on proxy measures was a rationale for the creation of the TEF, whereas the TEF is itself to be dependent upon the same proxy measures.

[p31, para 3] The discourse signals openness to responses and to considering sensible arguments for particular metrics. Government is 'not prescriptive', and it states that it 'would welcome your views on the broad principles...'.

[p31, para 4] The paper emphasises an ethos or set of values that the readers are likely to agree with. It does propose some nuanced use of performance benchmarks however, and so in the realm of public information does serve some practical purpose of metrics in recognition of institutions that are seen to progress the agenda. The assessment of performance using contextualised benchmarks does have the potential to disadvantage institutions which demonstrate strong performance on the basis of favourable characteristics of the students enrolled, who would otherwise be favoured by the use of 'raw' quality metrics. This is an approach that has been developed over a number of years under the NPM approaches of HEFCE - with the publication of increasingly sophisticated Performance Indicators from 20XX to 20XX. It is also interesting to note that when it had a material negative effect on the rankings of 'elite' institutions within TEF, the criteria were soon amended.

[p32, para 1] Simplicity is applied here. The recognised complexities of 'teaching excellence' are broken down to three headline component parts: teaching quality; learning environment and student outcomes and learning gain. Grappling with defining these complex notions is a classic HE policy-challenge of the NPM era.

The ethos and politeness approaches at paragraph 6 further emphasise the reasonableness and provisional nature of Government deliberations and ongoing developments in this area - cognitive transitivity is given emphasis 'we have begun to think', 'we recognise that', 'our initial thinking'

[p32, para 3] Provisional nature of proposals is emphasised here: 'we will consult...', 'purely as an example of what MIGHT BE considered', 'we could look at criteria such as...'

[p32, para 4] Again, 'we will consult...', 'purely as an example...', 'what might be considered', 'we could look at criteria such as...'

[p33, para 1] Again, the provisionality of the proposals is signalled.

[p33, para 1, question 1] Open question and an invitation to give reasons shows the deemphasis of these proposals in relation to others later in the document.

[p33, para 2] Simplicity is presented here to establish five principles for metrics and evidence. The presentation of a set of criteria such as these disarms the reader from looking behind the stated criteria at what principles may ACTUALLY have been applied. By giving emphasis to some words, it de-emphasises other principles that may actually be at play (such as the need to do no damage to existing elite universities).

[p34, para 4] It is interesting to note that the only point regarded as 'important' in the evidence and information to be gathered is that referenced by the champion of marketised systems - the Competition and Markets Authority. The tone is more assertive and the word 'important' gives emphasis. As the CDA methodology suggests, when a piece of discourse tells the reader something is important, it is important to ask why? What is receiving less emphasis?

[p34, para 6] Emphasises the lack of commitment at the time of writing to the detail of the policy. 'We are not being prescriptive here...', noting that Government 'will consult further' and proposes only data that 'these might include...'

[p35, para 1, question 1] This question follows the pattern of open questions about agreement with a 'proposed approach' concluding the question with a request for respondents to elaborate with reasons for their answer. It also uses an additional form of discourse not used to date, whereby the key points are restated, emphasising continuity with existing data collection points and institutional control ('evidence from the provider') de-emphasising the significance of the data collection changes proposed.

Chapter 4: Social mobility and widening participation

[p36, para 1] Themes of 'widening participation' and 'social mobility' have long been accepted legitimate activities or goals in relation to higher education. Government signals here its strong in principle commitment to them, encouraging acceptance of the policy.

[p36, para 2] Not unusual for HE policy discourse from Government during the NPM period, a marketised discourse is used to describe higher education study. 'Obtaining a degree' emphasises the transaction and possession of 'a degree' rather than the benefits of learning at a higher level. It is argued that it 'remains a good long-term investment' using a financial justification for the purchase or acquisition. Who it is a good investment for is suppressed (although the implication appears to be a good investment for the person 'obtaining' the degree). The paragraph is assertive. It makes its claim about the outcomes of prior government policy in advance of the evidence to support its justification. The data is described in self-congratulatory terms 'we have seen RECORD entry rates...'. A very specific percentage is claimed but no source of this data is identified.

The paragraph continues the self-congratulatory tone, it makes references to prior policy and is hyperbolic in its claims that Government 'have ensured that England's world-class higher education system is open to anyone with the potential to benefit from it.' This may be sloppy drafting but it diverges from the previous paragraph's

value-signalling in claiming that as a result of Government policy 'anyone with the potential to benefit from it' can access HE (or that it is 'open' to them). The preceding paragraph states that only those with 'the talent and potential should be able to benefit from higher education.' Thus, Government has signalled its belief in one narrower vision of access to HE whilst passing (and then celebrating) legislation that (allegedly) allows access to anyone 'with the potential to benefit from it - in possession of 'the talent' or not.

[p36, para 3] A familiar theme, of 'unfinished business' from earlier Conservative governments is restated. The paragraph includes a piece of power policy discourse, the association of the policy with an agenda advocated by a person or organisation with more political power than the author, with the intention of signalling that to question this element of the policy would not just question the policy and its authors, but would question the Prime Minister, reducing the likelihood that certain political policy actors would do so.

[p36, para 4] A preoccupation of Conservative governments in relation to HE has long [for how long] been the access to 'the most selective' institutions. Here it is claimed that data supports a view that students 'from the most disadvantaged backgrounds' are now progressing to 'the most selective' institutions, yet the reference provided reports on access to institutions with the highest UCAS tariff requirements. There may be some correlation between the two but institutions influence their tariff on entry for different reasons - limiting supply of places because they see tariff on entry as an indicator of elite status and nurturing the notion that study at their institution is a Veblen good - valuable for international markets where fee levels are uncapped. For others of comparable quality an alternative strategy of maximising admissions in order to maximise profit produces higher yield but potentially lower tariff on entry.

High average tariff on entry is only a good indicator of selectivity if grade score on entry correlates completely with acceptance. Selectivity (the ratio of acceptances to applicants for places) may not correlate with tariff score where alternative measures, such as interviews, auditions, or random chance, are used to select those learners enrolled.

[p36, para 5-7] These paragraphs stating prior HE policy are similarly designed to signal that Government aligns with values it expects many readers will share.

[p37, para 1] This whole section (paragraphs 8-14) signals Government alignment with an agenda of racial equality with considerable reference to data about disadvantaged learners from different groups. The extensive and data-heavy nature of this text suggests value-signalling and a potentially different author. The prescribed action would appear not to be commensurate with the scale of the problem identified. This suggests an intention to appear to support an agenda shared by many in the university-sector, but a lack of commitment to its resolution.

[p37, para 3] A reference to a footnote is provided which links to a press release from the Office for Fair Access. Unfortunately, the OFFA website has not been properly archived and the press release is not available. Referencing to a press release as opposed to the source document providing evidence is a continuation of the 'pseudo-academic' style of discourse that seeks to appear to follow the

discourse conventions of academic papers yet follows very poor academic practice. The Government has many staff capable of academically rigorous writing, so the possibility that it is a deliberate discourse technology being deployed rather than poor drafting should not be discounted.

[p37, para 5] Surprisingly, this data-heavy paragraph provides no source for its relative percentage claims of different ethnic groups. Paragraph 13 references 'Research by BIS' but without a reference. The phrasing in paragraph 13 is also confusing in that it is unclear exactly what is being compared to what. The intent appears to be to highlight the importance of white male low participation. This would play into a wider policy agenda in a wider field - that of the politics of race, class and geographical disadvantage, with the Government keen to appeal to white voters who may appreciate the emphasis on disadvantaged white males rather than other groups.

[p38, para 1] The relationships between the actors is passive and the active verbs limited in their impact: the Government 'will ask' the Director for Fair Access 'to focus on' signalling a lack of intent.

[p38, para 2] This paragraph is both passive, deferential and vague, lacking in urgency or scale of response. It 'asks Universities UK for their advice. It does not seek 'urgent action to address a long standing iniquity undermining the meritocratic ideals upon which the whole higher education system is built' but merely states that Government 'wants', 'to see a clear focus on', 'these issues', by University leaders and 'develop innovative and new approaches to 'some' of these longstanding issues. There is a lack of clarity as to whether Government or University leaders will develop the 'innovative and new approaches' and an obvious separation between Government and the universities, via their 'leaders' and their representative body/lobby organisation UUK. This is the extent of the Government's policy response. The remaining sentences report on activity planned by Universities UK, to progress 'this' - where again it is unclear as to whether 'this' is the advice, new approaches, or innovative approaches that will be developed. The efficacy of the policy is not directly in question here. The collocation in the paragraph with the Government suggests a partnership between Government and universities, yet the described task appears to defer to universities in their authority to determine what action should be taken, in contrast to other policy areas in the Green Paper. One might conclude that the supportive rhetoric yet the distancing of Government from the action signals a lack of interest in 'driving' and real change.

[p38, para3] In policy terms, the reference to a prior announcement from the Prime Minister, and the association of that policy announcement with the person, rather than the more abstract 'Government' is used to carry weight. The use of the same term as that referenced in the Prime Minister's speech ('name blind') gives an inter-textuality and connection of the Green Paper with wider Government policy.

[p38, para4] The paragraph reiterates the intention for the proposed policy to an agenda regarded as being supported by the majority of readers - that of tackling disadvantage and furthering equality. The text makes reference to a previous part of the Paper, describing it has having 'explored in detail' the 'link between the TEF and access and success for disadvantaged groups.' This synthesis and re-statement

is a form of inter-textuality that uses the temporal restatement of a claim made at an earlier stage in the book to give the impression of its stronger validity. As noted before, the actual extent of this connection is rather limited, though this paragraph would make the reader believe it was well established.

[p38, para 5] Here the Paper makes an inter-textual reference to a later section. The new organisation is described as having student interests 'at its heart' using personification and a word choice to suggest an emotional not just intellectual rationale for the structural changes proposed. For some, the characterisation of Government policy seeing to create 'a new architecture for higher education' is an assertion, through discourse, of a greater role for Government in higher education than that legitimately taken previously, where the autonomy of academics and academic institutions are paramount and strict limits put on the powers of Government to seek to 'build' or 'architect' anything from those autonomous bodies. The proposed action is itself apparently modest: to 'join up' current activities to 'generate maximum impact' and 'further explore' how best activity 'could' be funded.

[p38, para 6] The action orientation is vague and the proposals tentative and exploratory: 'There could also be scope to...although this would need to be balanced by...', 'An option would be for...', 'In these circumstances the Office for Students could also...', '...should an institution fail to achieve its targets WITHOUT GOOD REASON..., which would mean...'. This discursal form serves to make the proposals therein more palatable to institutions unlikely to be happy about an increase in the powers of a regulator, with the potential to do damage to an institution's finances by restricting its freedom to charge fees to UK students to £6000 rather than £9000.

[p39, para 1] The following section addresses power relations in the wider HE field and apparently unconnected policy themes not related to the central theme of the Green Paper around market-oriented reforms under the cover of a focus on teaching excellence and widening participation. The first of these addresses a power struggle, where the Government signals, in the Green Paper, its willingness to acquire legislative powers to strengthen its position in relation to other actors.

The focus of this attention is UCAS - an independent charitable organisation providing services brokering application and admission to UK HE providers. It is funded by university-subscription and user fees, with a Board of Trustees dominated by university vice chancellors. Fulfilling a function often carried out by Government-controlled Non-Departmental Public Bodies, it had resisted the release of data to Government for purposes other than those covered within its charitable aims (or to its critics the interests of the universities that are its main funder). The Green Paper threatens to obtain legal powers to require UCAS to provide such data, without revealing this directly, with the discourse focusing on the value of a wider dataset for meritorious policy aims.

[p39, para 3] As noted above, the emphasis given to 'white males from disadvantaged backgrounds' plays into a wider field of the politics of race, class and geographical deprivation emerging for the Conservative Party. There are many groups under-represented for some time within HE, but white males are drawn out,

arguably because of a wider political agenda across Government to appeal to 'white van man' and those white male voters who may be drawn away from traditional labour voting in favour of the Conservatives.

[p39, para 3, questions 1-2] These questions remain open and exploratory: 'Do you agree...', 'Please give reasons', what other groups or measures should the Government consider?', and the consideration of requiring respondents to spend considerable time justifying with evidence the additional costs that might be associated with the policy proposals. It is interesting to note that Government might reasonably be expected to have estimated these costs itself, but it does not publish these itself and ask if they are accurate. Instead, it asks for respondents to estimate the costs associated with the 'additional administrative burdens [that this] might...place on organisations? Within the text there is only one organisation referenced that additional data might be required from - UCAS. In this context, the question is clever power discourse. It mobilises the influence of respondents by asking a question of them that they will have little ability to answer.

The question asked, 'What additional administrative burdens might this place on organisations?' and for respondents to quantify additional costs associated with that additional burden. Given only those with a knowledge of UCAS could answer, respondents are, following behavioural psychology, likely to replace the complex question with a simpler one, which can be answered: are there additional administrative burdens TO YOU, and do YOU expect to incur any additional costs?' If a complex question can be crafted and the heuristic predicted with some high degree of probability, a response supporting the policy proposal can be anticipated.

The second question has been framed by the first part (of question 13 - 13a) where the question states a policy likely to be popular ('improving access') and asks about 'potential benefits' that might arise 'from additional data being available'. The specifics of the policy proposal, directed as it is to one organisation, UCAS, are clouded in the mind of the reader. The posed questions are a form of interactional control inviting the reader to respond to a slightly different question: 'What benefits would there be to an agenda you are supportive of arising from having additional data available about it.'

[p39, para 4] Here the tone is assertive in claiming success in the future of a policy initiative just launched. '[Degree apprenticeships] WILL ATTRACT a wide range of potential applications who want a degree via a different delivery model'.

[p40, para 1-2] The assertive tone continues. Without evidence, 'apprenticeship training offered by higher education providers' is described as 'excellent', and the future is predicted 'we would expect more employers to take advantage of', after major changes to the financing of apprenticeships (in the introduction of the apprenticeship levy) and going on to state, again without evidence, that 'In particular, there is strong demand for STEM degree apprenticeships' in a context that is reporting as fact something that appears to be in the future. Paragraph 26 goes on to state that '[Degree apprenticeships] is an exciting new venture FOR HIGHER EDUCATION PROVIDERS OF ALL KINDS...' going on to say that Government will 'STIMULATE employer interest.' The purpose of these paragraphs appears to be

to encourage HE providers who are not currently providing degree apprenticeships to get involved.

[p41, para 6] The section on Sharia-law compliance loan system takes 10 paragraphs. The significance of the proposals are not mentioned. The absence of discourse is significant. The Government having introduced student loans as the principal method of accessing higher education discovered that for certain faiths, in this case Muslim, this would not be accessible due to religious rules about usuary. This would make the Government's HE reforms introduced by the coalition government in breach of Equality Act legislation. The Takaful finance vehicle would appear to be the complex solution. It is interesting to note here that there is no invitation to comment on degree apprenticeships or Government proposals over Sharia-compliance, even in views over the most effective vehicle for its implementation. The absence of questions where the form of response is to reply to posed questions, represents a form of interactional control.

Part B: The higher education sector Chapter 1: Opening the sector to new providers

[p42, para 1, heading] 'Opening' the sector suggests a sector that is 'closed' to new providers

[p42, para 1] This is probably the most discourse technology-rich passage in the whole Green Paper. It is used at the first paragraph of the section setting out arguably the most radical HE policy proposals made in over twenty years. It is a prime example of what is described here as 'power discourse'.

This assertive passage states without evidence effects that are documented in NAO research carried out shortly before the Green Paper as being untrue. The causal effect is identified as the result of the introduction of new 'high quality' HE providers to the HE sector.

'Widening' is used in favour of 'increasing the number of' because the word has the desirable connotations of connection with 'widening participation in HE for disadvantaged groups' seeking a parallel with 'disadvantaged providers' for whom barriers to access should be removed. In this sense there is a meta narrative present across the whole Green Paper where the emphasis on widening participation for learners in Part A creates a mirror for the same activity in Part B. The prefix 'high quality' to 'higher education providers' or 'providers' as a term to describe private providers of HE is so prevalent in this section as to become a metonym. This is ironic given the extant National Audit Office report of XXXX that revealed the spectacularly poor value provided by private providers of HE.

The use of the word 'aspiration' connects the policy with discourse of striving, entrepreneurialism, betterment, and the deserving 'hard-working' student of Part A. The term 'barriers to entry' is extended with the adjective 'unnecessary' and used in favour of 'systems that maintain high quality and standards'. 'Parallel systems' conjures images of duplication of effort, where the favoured system is the supposedly incontrovertibly desirable metaphorical 'level playing field' (for only an idiot would seek to play on a sloping playing field). 'Clearer choice for students' would seem to equate with the desirability of increasing the amount of HE

purchased from these new providers, as a re-definition of the word 'clearer' given the proposals put forward.

The 'simplicity' argument is deployed here, with the attractiveness and common sense appeal of a 'single route' into HE. The passage blithely asserts a parity between established universities and new profit making private providers ('all providers are equally able...'), and positions the policy proposals as enabling a self-evident good - the provision of greater choice for all, at all times ('both at entry, and once in the system').

[p42, para 2, bullet 2] The level playing field referenced again.

[p42, para 2, bullet 3] The inclusion of a faster trajectory for providers to award degrees and secure university title in a sub-clause to a preview of a later section could be described as an example of 'tangentiality' - the discursive practice of putting radical and significant matters not in the discursive 'critical path' of a paragraph (typically stated at the start and end of a paragraph), but within a lower profile area, discourse-wise, in an attempt to limit attention paid towards it.

[p42, para 2, bullet 4] The debate around 'reduced regulation' or regulatory burden is a long standing debate within HE policy discourse in England amongst existing university providers. It could be argued that regulatory controls could be reduced because providers shared a common ethos and track record of high quality. The differentiated system with requirements for 'risk-based monitoring and compliance' is arguably only required because of the entry to the sector of new providers delivering poor quality, hence requiring greater regulatory controls.

[p42, para 3] The discourse technology density in this passage suggests it will be important to the argument. For many years the right to provide higher education has been tightly controlled and the right to use the title 'university' only bestowed by the Privy Council. New providers have not been seen as good for quality or the public interest. This passage is at pains to assure readers that this is not endangered by its proposals and that Government shares a belief in the importance of maintaining the sectors 'excellent global reputation'. It references controls put in place by the Coalition Government as an example of this commitment, and goes on to reference the more recent guidance for providers on the requirements of operating, in a similar vein. These controls were put into place following funding reforms enabling private for-profit providers to access the state student finance system which was widely regarded as having led to poor quality and value for money.

[p42, para 4] Discussion of new providers substitutes 'high quality providers' and 'high quality alternative providers' for plain 'new' or 'alternative' providers. The emotive 'EVEN the highest quality alternative providers' are subject to controls sets the reader up to expect terms that are unreasonable.

[p42, para 4, bullet 2] The phrase 'have until now been unable to grow' is a quasi-anthropomorphic image of a person (or other living thing) being unable to do the most natural thing in the world - to grow - suggesting injustice.

[p43, para 1, bullet 3] Here is the use of the metonym 'incumbent provider' to refer to established universities. Arguably this term is used pejoratively, summoning up images of an office-holder close to retirement.

[p43, para 2] The current policy that maintains quality and standards through protecting the rights to award degrees and deliver at scale are described as 'barriers' which it is natural to have 'made a start in removing' as that is what one aims to do in policy discourse with something called a barrier.

[p43, para 3] The discourse of continuity and momentum, ('we want to go further') suggests a ball that is turning already. There is a restatement of the barriers to be removed and a continuity argument around stages into the future - with legislation but also before that is passed - to deliver the policy.

This passage is curious. It almost reveals a lack of confidence that Government would get the proposals requiring legislation approved and so says 'even if we can't do that, there are still some things we can do to give more market share to the private providers.' As policy discourse it is poor though as it does not use discourse technologies or project assertiveness.

[p43, para 3, bullet 1] Here, in practical proposals, the meaning of key words is allowed to remain ambiguous. Words that are not regarded as inflammatory or indeed are usually regarded favourably in the policy field, are used, but with a different practical impact. So 'Alternative ways of obtaining assurances on quality and financial sustainability' may well to others be regarded as allowing a lowering of standards - the key being 'alternative ways'.

[p43, para 3, bullet 3] simplification applied here as an unquestioned policy good - the 'combining of common elements...', 'in order to simplify the framework for providers'. Note attention is not drawn to the fact that the target of the simplification is 'alternative providers' and not providers per se.

[p43, para 3-4] There may be something at play when policy discourse shifts from the ideational level to the practical. The shift can signal a lack of confidence in the ideational robustness of the policy arguments, and move to common sense practical considerations that at the operational level then appear acceptable but are, in combination, more significant at policy level. Of course, many policy documents might move from one sub-field of policy to another, from ideation to implementation to evaluation for instance, but the points of shift can warrant particular critical attention.

[p43, para 4] It is interesting to consider whether the use of a diagram explains or obfuscates. The simplicity of the diagrammatic form can encourage the reader to move quickly past it. In this case, the diagram contains, in the wording in boxes, important detail about the definitions of 'common good' words like 'faster', 'simpler', and 'more flexible'. The words 'and other quals' means that the private provider will be able to use examples of having delivered non-degree educational content as evidence of 'track-record' that they are capable of delivering degree-level HE.

Similarly, the differences between the box '3 years of accounts + QAA HER = specific course designation, 100 SNC' and '2 years of accounts + QAA HER = student funding

available, no SNC' looks minor. The abbreviated form means those readers with a limited recall of the meanings of the acronyms may not pause on the implications. The meaning of this section is significant - the former manages risk associated with private providers in that allows only up to 100 students for specific courses delivered by providers that can provide 3 years of accounts. The latter allows unlimited numbers of courses and unlimited numbers of students who can use public funding from the student finance system to pay for courses at the provider.

The difference between 'Application for degree awarding powers based on track record to date' and 'Application for DAPs based on track record of provider + key individuals' allows an organisation with no record of delivering degree level HE to hire an individual with experience and use that as evidence to be able to award its own degrees is a significant loosening of quality controls and assurances.

The instance arises from a high profile individual academic, A C Grayling, who created the New College of the Humanities which was used as an example of the type of private provider that would be allowed to be created. NCH was far from typical of the new private providers, and functioned as the acceptable, if eccentric, face of the new private for profit providers.

[p43, para 4, bullet 1] Changes described in terms regarded as 'common sense' goods - in the current era, enabling 'quicker access' to anything is regarded as positive. Other examples of similar 'common sense goods' might be 'increased flexibility', 'easier', 'removal of barriers', 'creating a one-stop-shop', 'simple and straightforward advice', 'widen...', 'increase diversity in/of...', 'new', 'modern', 'single route', 'sustainable', 'for employers', 'earlier', 'shorter time'

P45, para 1, bullet 3] It is interesting to note the assertive tone that 'Providers...would not be formally part of the English higher education system, **ALTHOUGH WOULD BE ABLE TO OPERATE AS AT PRESENT.**' The pre-existing system allowed private providers, through partnerships with universities, to enjoy all the freedoms of the university in relation to fee and scale of provision, with the university taking responsibility for the quality assurance. The passage acknowledges (with the 'not be formally...' element) that the new 'threshold' approach to minimum controls could be bypassed and chose not to legislate to prevent it. A number of providers have chosen to continue to operate in this way.

[p45, para 1, bullet 5] A common regime, the theme of equality of treatment as a 'common sense' concept being applied.

[p45, para 1, bullet 6] This ability to charge up to £9000 represents THE most significant policy proposal in the transfer of funding to private providers. Combined with the equality of status drivers that mean the freedom to charge the maximum regulated fees, a freedom open to the best performing and most prestigious universities, would be extended to the newest, poorest quality profit making provider. One could argue that the proposal levers the value from the world-leading public university brand reputations and allows private individuals to exploit that brand for profit.

A curious use of the word 'value' which is unspecified elsewhere in the text as to what 'value to English higher education' is referenced and what things are perhaps not regarded as of value.

[p46, para 1, bullet 2] It is interesting to note that this definition would apparently rule out the providers of the bulk of non-university HE provided to date, FE colleges, because the bulk of their provision would not be at level 5 or 6 degree level (foundation and bachelors). This despite the far higher quality ratings of these institutions than the new private providers. It signals the intention is to facilitate the entrance of private providers, not to create a diversity of provision or remove bureaucratic burdens per se.

[p46, para 2] This sentence is almost triumphant, yet it is curious as to what the 'very significant step' is a step towards. It states it is a significant step 'in creating truly competitive provision for higher education in England.' The word meaning is interesting 'truly competitive' would appear to be a synonym for 'HE with the highest reputation, by implication able to compete in a market for those purchasing a higher education on whatever basis those customers choose to seek in an HE provider. It does not say that it is creating 'a market with true COMPETITION between providers to provide HE in England. The wording used would suggest that the entry of new providers is not to compete IN England but to support the highest quality providers to 'be truly competitive' with other HE systems in other countries. This could of course be sloppy drafting but 'True competition IN provision OF higher education in England' was an obvious form not used.

[p46, para 2, question 1] There are a number of questions that could have been asked here to tease out views on the different and significant changes proposed. Instead reference in the question is made to 'the proposed single route' (reinforcing the simplicity message). The second part of the question is directed towards private providers who will experience the new system. As noted above in relation to the interactional control exerted by the form and wording of the questions, this question asks for reasons and 'information quantifying how the potential costs of entry would change as a result of these proposals'. The costs of entry would seem to be one of the matters of least significance (other than to indicate that they would increase, providing evidence for further removal of 'barriers to entry'). There is not even a question about whether it would meet the policy aim set out in the preceding paragraph of 'creating truly competitive provision for HE in in England.' This serves to suppress discussion of these questions.

[p47, para 1] The paragraph leads with the lack of flexibility - a common sense appeal in which 'more flexible' is always regarded as preferable to 'inflexible'. The paragraph is then surprising in its honesty about the reasons why under the current system there are restrictions over degree awarding powers, that there is a distinction between 'alternative' and 'publicly-funded', and even a statement that the 'height of the bar' is set 'necessarily high'.

'...many providers needing to demonstrate no fewer than four years' experience' suggests that such terms are excessive or burdensome: used in favour of 'providers are usually expected to demonstrate four years' experience as an assurance of track record...' for instance

[p47, para 3] The much favoured 'level playing field' metaphor leads on a paragraph that appears to apply and be relevant for all providers, because of the emphasis on 'all new DAPs'. The policy only impacts on those who do not currently hold DAP and discourages, as noted above, FE colleges from applying, leaving private providers as the only beneficiaries. The statement does not even seek to provide a rationale for the contradiction of the statements about the appropriateness of the controls in the current systems in paragraph 10, a surprising collocation and lack of cohesion in the text.

[p47, para 4 header] 'Risk-based approach' is a fashionable term in regulation, supposedly ensuring that the regulatory burden is focused on those agents that are regarded as highest risk of transgressing whatever rules or standards exist. It is a useful term in policy discourse because it allows the freedom to flex which agents should be subject to more or less regulation, under the guise of a positive and supposedly logical headline regulatory position. In this case, it should be remembered that whilst the discourse is of an approach applied equally across a whole system and then providing different levels of regulation across them, the measures only apply to new private entrants. All measures result in a reduction in the standards and levels of risk management applied to those providers, with the policy providing cover for even greater reduction for certain providers. There is no reduction of regulatory burden benefit to existing publicly funded providers.

[p47, para 4] This paragraph reinforces the view of FE colleges not being the focus of the policy, but avoids any explicit mention of them.

[p47, para 4, bullet 1] The paragraph emphasises the restrictions on some providers with limited evidence of provision, and so is likely to be well received by those concerned about quality and standards. It hides an important, and first, reference to extension of powers for private providers, through the use of tangentiality. The sub-clause is giving evidence of those things that a provider with limited evidence CANNOT do. Through this device it is able to identify for the first time that private providers will have the power to validate degrees at other providers (creating a further mechanism for these providers to circumnavigate the 'threshold' requirements of the supposedly single system). It also states that there will be no restrictions on international visa conditions (the subject of considerable private provider fraud at level 5 in the preceding years).

[p47, para 4, bullet 2] 'Light touch' monitoring is seen as the most desirable form and is a metaphor commonly used.

[p47, para 4, bullet 4] 'Incumbent provider' used again as a pejorative term in favour of 'established publicly-funded university' for instance. This short section contains proposals for a serious and significant curtailment of the existing powers of universities. The paragraph is presented as a sub-clause to a wider point about risk-based regulation. The 'level playing field' creates significant risk for established universities and significant freedoms to private profit-making providers.

[p47, para5] 'Lifting a moratorium' is a positive upbeat wording. It is followed by the popular 'remove barriers to...'

[p48, para 2] These paragraphs are no longer asking questions of the respondents about the wisdom or otherwise of measures, the aims and the most effective mechanisms to achieve them. The discourse is assertive, detailing what will be done, not asking questions. Mental transitivity (we expect that...) reinforces this. The issues around research degree awarding powers as distinct from taught degree powers are arguably rather different, requiring different criteria. This is not entertained. It states the expectation that this will be done, referring only to another review in train, the Nurse Review, to consider the details of this.

[p48, para 4] As with other proposals in this section the paragraphs are assertive, saying what 'will' happen. This contrasts with the proposals in Part A which were far more open and speculative. Cogitation over the pros and cons are not encouraged.

[p48, para 6] Proposals here are assertive, with mental transitions and lexical cohesion within the argument of 'We want to...', 'For this reason...', 'We therefore expect that', 'Changes...could be made without primary legislation, and in advance of the new framework.' For a paragraph proposing redefinition of the university, a title previously conferred by the Privy Council, this is a significant change. There is no discussion in the paper about why scale of provision may have been part of the definition of a university, and whether universities have any other purposes beyond teaching delivery and how these might be assessed, and whether all things are possible if an organisation called a university had only 50 learners.

[p48, para 7, header] The term 'safeguarding' in education is usually used in the context of the safety of children. The term has a strong positive connotation.

[p48, para 7] This becomes even more assertive in tone. There is no rationale provided as to why 'It is vital that...' the sector must be 'opened up'. The phrasing 'opening up of opportunities' to enter' plays into common sense themes that people should have freedoms to go where they please. The paragraph seeks also to establish a connection, through its collocation in the paragraph, between private providers allowed to deliver HE and 'elite' provision. Proposals that are described as being about the equal treatment of all again are delivered through powers that are to the significant detriment of publicly funded universities and to the significant advantage of private providers. For the first time this policy proposes that universities can be stripped of their titles and rights to award degrees.

[p48, para 8, header] The 'common sense' thing to try to do to a process is to streamline it. As CDA methodology indicates, such common sense terms are used, they may conceal power intent. Here, the heading proposes the removal of the Privy Council from the process of awarding university title and the devolving of this task to HEFCE, a Non-Departmental Public Body under the control and direction of the Secretary of State for Education.

[p49, para 2] This is another piece of power discourse, revealing an area that is shown to be a particular concern for private providers of HE in the asymmetries of power in the validating relationships with universities. The priority is presented as removing 'barriers to access to the sector' for private providers. Emotive language and word choice is used (a requirement for a 'validating body of last resort' because of the restrictive practices of existing bodies, alternative providers are prefixed by 'high quality', which are 'locked out' of providing degrees due to validating partners

not 'willing to work with them'. Those established universities are described as the blocking 'incumbent providers'.) The passage predicts, without evidence, that 'in the future, incumbent providers may become more wary of validating new entrants.' so that even if it cannot be shown that they are not validating partners now, legislation is required for what could possibly happen in the future. There is no evidence presented that there is any restriction from the validating institutions, nor a consideration of the workings of the market for validation services that is active, with many suppliers and customers. In the absence of this evidence, the issue is highlighted as 'one-sided', a matter of 'concern', an area where validations agreements 'are not transparent', and the impression that validating bodies are unwilling to partner on the basis of what has been 'suggested' by some private providers. The paragraph even acts to denigrate the effectiveness of the Government's current UK Quality Code ('notwithstanding the expectations set out in the UK Quality Code, validation agreements can be highly 'variable'. Private providers are again associated with 'diversity' and 'innovation', with the meaning of the words used not to signify diversity of student intake. 'None of the proposals are the subject of questions about the veracity of their claims or the suitability of prescribed actions.

[p49, para 3] Assertive position of the steps Government is considering 'in order to remove barriers'. The options show that which can be done with or without legislation, signalling the strength of Government intent. There is no set of questions about the options available as to how to achieve the objectives as in Part A around the TEF.

[p49, para 3, bullet 3] It is interesting to note that the system established within the NPM period already created a market in validation services which apparently functioned relatively effectively with price and quality differentiation, a number of competing providers seeking to provide validation services and easily available information about who provided what service.

[p50, para 1, question 1] The questions in a consultation manage the interactions of the respondents. This section contains the most radical and significant proposals potentials since the Robbins Report of 1963. The question is sparse and bland. It is arguably designed not to illicit responses about the radical proposals. The avoidance of these questions is a form of control, as CDA methodology suggests it will be.

[p50, para 2, heading] The common sense 'speeding up' in the title here and the association of the reforms (which amount to Government having greater risk appetite in the admittance of private providers to deliver HE in the absence of new legislation to control quality) with the familiar prefix of 'high quality' new providers.

[p50, para 2] The paragraph is unequivocal that Government's 'clear priority' is to widen the range of private providers (where 'high quality higher education providers' is a metonym for those providers). The paragraph makes the argument that it is balancing two forces, also 'guard[ing] against poor quality and...deliver[ing] value for money'. It goes on to propose immediate measures that act only on one side of those two priorities. It can be seen that this is an agenda of privatisation of

the public realm that is applied across aspects of government by the newly elected Cameron government and should be seen in that context.

[p51, para 4] It is interesting to note that in relation to the financial sustainability of private providers, the proposals are far more cautious and less ideological, without an assertive statement of the value of new providers entering the market quickly, as in other paragraphs. It may be that in respect to financial liabilities, the influence of Treasury, concerned over the potential costs to Government for having to compensate or cover the recovery costs of failed private providers, tempered the discourse and the substance of the proposals as a condition of agreement of the policy.

[p51, para 5, header] The 'risk-based approach' means a reduction in risk mitigations or keeping them the same, with no action to mitigate areas of increased risk.

[p52, para 4] In relation to the small provider arrangements, HEFCE had applied controls because there was a correlation between small and new provision and poor outcomes. This policy advice is not quoted, although such advice to Government in the drafting of policy, if provided, would not usually be referenced.

[p53, para3, question 1] The section around speeding up the ability of private providers to enter the sector and grow their provision appears ambivalent. The main prize being sought, which is referenced a number of times, is that new legislation will pass a new framework. These proposals have been made assertively as noted previously. The proposals short of legislation still seems to be Government or civil servants uncertain of the ability to get legislation through and so presenting those measures that could be taken in the absence of legislation.

Chapter 2: Provider exit and student protection

[p54, para 1] On the one hand this section applies words and uses word meanings that suppress the significance of the recent changes. There is an absence of reference to research relating to the impact of the changes discussed and the changes to Government policy are portrayed as naturally occurring events without actors making the changes. The conjunctions in the argumentation: the sector was X, 'so the need for Y' create a discursive support for a logical support of the proposition. Interestingly tangentiality is also used, but this time through analysing a historical position, where 'the need...has been very low', and presenting it in contrast to the current situation whereby implication there then was a need. The rapid expansion of private providers into the HE market, which Government was so concerned about that it imposed new controls to curb it, is described as 'creat[ing] a more open sector.' Growth of private HE is seen as a natural and unproblematic consequence of 'reforms' that have no actor or initiator.

On the other hand, the phrase 'fluctuation in the sector' and its contrast with the prior condition of 'stability' does not appear to support the argument (if it is made to those who believe stability for institutions providing higher education is good for HE and for students) as effectively as a passage that said, for instance 'there was little dynamism in the sector. The paragraph is explicit that alternative providers now 'compete directly' with 'other providers' (though an alternative position might say universities, 'incumbent providers' is not used here which would be more

disparaging. It is explicit about the speed and size of growth in private HE, something that many respondents may not be aware of. It is however presented in the context of the current arrangement, the status quo which is not questioned and which sets up the common sense argument that the role of Government is to make adjustments through policy to reflect this, rather than question if this scale of growth is desirable.

From within the habitus of a Government with a strong market ideology and built upon a long period of NPM market-methods, this logic may perhaps have been unquestioned, as opposed to a deliberate policy jump. This issue will be addressed at greater length later in the paper.

[p54, para 2] This paragraph creates a picture of actors making choices, and those actors are introduced here in that context: students making choices that 'drives the sector' and providers making choices about 'exiting' the sector 'through its own choice' or 'by necessity'. It assumes a market paradigm where the purpose of actors are assumed to be only in the context of the market - with 'providers' entering or exiting dependent presumably on whether sufficient profit can be made in the HE market in relation to other markets that might be invested in. As a counterpoint, a university with a royal charter for the provision of HE or a registered charity, with charitable aims related to education, might not regard 'provider exit' as a choice that is open to it, though this is implicitly assumed.

[p54, para 2] The word 'exit' is used provocatively, which is in contrast to other sections, though still assertively in relation to the need for this policy change. Exit is placed in speech marks indicating perhaps that even to the author it is given a meaning not consistent with its normal usage as it denotes changes at course and campus level as well as provider level. Interestingly, given that a change to course provision or campus locations is a matter for a university itself under the pre-existing system, this measure creates new powers for the State in having a right to intervene in a new role to regulate such 'exits'.

[p54, para 3] Here it is clear that competitive means competition between providers. 'Providers' is prefixed again as 'providers that innovate and present a more compelling value proposition to students...' as those who will win 'at the expense' of those who will lose. The losers here are named as 'institutions' rather than 'other providers', missing the opportunity to avoid a contentious term. This is particularly the case as the first sentence already states the latter. To increase the 'share', i.e., 'proportion' necessarily requires the reduction in share of another. If they grew the market, then the volume of their business might increase but not necessarily their 'share'. The simplicity of the workings of the market is a further discourse technology applied - there may be many reasons why some providers increase and others decrease market share, unrelated to 'innovat[ion]' or their 'value-proposition', but these are not contemplated.

[p54, para 4] This paragraph starts assertively with a statement of apparent fact (that something 'is undesirable') yet the points are rather more balanced in the paragraph, stating arguments both for and against. The arguments against the proposed policy are restricted ('However, there may be limited circumstances where...') by time, by context, and by purpose ('on a temporary basis', 'in a location

where there are no other HE providers...', 'to give time for an orderly exit.'). There is a great deal of confusion in the terms used and their logical associations, The reasons used in justification for the policy are theoretical but asserted ('Difficulty attracting students or poor quality would not be in the long term interest of students, and could damage the reputation of the sector.'). It is not clear how low student recruitment necessarily leads to damage to the reputation of the sector. Why it is not in the long-term interest of students rather than their interests per se is not explained. The problem is presented as poor quality, which facilitating provider exit helps to solve. Though it appears the author thinks improved quality as an outcome is unlikely or incidental, (it says removing provision 'May INDEED lead to it being replaced by higher quality provision.'). suggesting that it is not in fact the main consideration but a byproduct of the main object, which is arguably to remove publicly funded providers irrespective of the reasons to make way for private providers. It asserts that it is not in the 'taxpayer's' interests (note this familiar simile for Government that is regarded as more acceptable), to 'sustain institutions in difficulty'. This speaks to a discursive chain in HE policy discourse where sustaining the health of the sector was a stated responsibility of the HEFCE. 'Taxpayer's interest' is not defined, but it is then, without evidence, stated to be not furthered by three additional vague terms 'to 'sustain', 'institutions' (not providers), 'in difficulty' - presumably financial but potentially wider, given the earlier suggestion that 'reputation of the sector' WAS grounds for Government intervention, or where there is 'failure to comply with 'regulatory requirements', 'including a tier 4 sponsor licence' (speaking to a recent scandal of public-funds being lost by fraudulent private providers recruiting international students (a policy issue on a wider policy field of immigration policy)). None seem to relate to quality or to 'student choice'.

[p54, para 5] This asserts the role for Government, positioning it, as is common, with the interests of the consumer (student). It does muddle this through asserting a second 'strong focus', or rather jump to a particular type of student interest, that of 'minimising disruption to their studies'. One would accept that in a market regulator role the customer would be able to prioritise and state its own interests, which might be in the form of maximising compensation from a poor quality provider, than 'minimising disruption', suggesting a meeting of two policy objects.

[p54, para 6, bullet 1] This assumes a market paradigm and speaks to the implications of it, arguing that greater information to consumers will enable the market to function efficiently and lead to a reduction in demand from those who are risk averse as to the possibility that their provider will go bankrupt during their studies. There is evidence from behavioural economics that consumers are very poor at being able to deal with complex choices about outcomes and goods to be secured and consumed in the future and so substitute with heuristics to deal with complexity. An alternative perspective on the role for Government if it were to defend the interests of consumers might be to eliminate risk from some factors so that consumers can focus on those areas they are centrally concerned with and able to make a judgement over, such as the quality of the education.

[p54, para 6, bullet 2] The Government policy appears to desire provider exit but to absolve itself of responsibility for it happening, suggesting that the actions of the

agent of Government 'would NOT generally result in exit'. Equally, Government intervention to prevent it is undesirable in most circumstances. The removal of Government as an actor, in what will be a heavily regulated market, suggesting that outcomes are a result simply of market forces at work is a piece of policy discourse revealed through CDA, when in reality there is political action at work when Government desires the exit or entrance of a provider.

[p55, para 1, bullet 1] This is assertive discourse considering it attributes great influence to a policy instrument as yet undefined and untested. 'The contingency plan...will be particularly powerful here, as the provider will not be permitted to exit without putting the contingency plan in place.'. It makes the assumption too that a provider 'exiting voluntarily from a market' seeks to further the interests of its customers as opposed to the interests of its shareholders. Evidence of provider exit in other markets could have been referenced here to understand the realities of exiting company behaviours.

[p55, para 2] This appears to be stating the interests of multiple stakeholders, which may be the result of approvals to the policy from across Government. 'Minimising any impact on public finances' is stated as an outcome sought, (potentially the result of Treasury seeking assurances of such in its comments on the policy), yet the measures proposed do not address that outcome. The final statement reveals the intent, that in protecting the interests of students Government 'would seek to ensure that the regime does not create unnecessary barriers to exit'. Again, the priority of these reforms appears more to facilitate the exit of institutions to make way for private providers.

[p55, para 3, bullet 2] The final sentence of this paragraph focusing on the financial compensation that providers may need to pay to customers who don't get what they purchased is revealing. It states that 'Any such requirements would need to be carefully designed so as not to create a barrier to new entrants.' The priority appears to be the entrance of new private providers, and if protections for the student interest were to restrict the likelihood of that, the protections would need to be changed.

[p55, para 4-5] This section first contextualises the word 'support' to narrow its meaning to apply to being assisted to exit the sector, then uses the word in subclauses without the explanation of its context, to suggest situations in which Government might intervene. The examples appear to suggest intervention to keep an institution operating, whereas the proposition is that the OfS might intervene to advise when and how it should close 'in the public interest'. The themes identified are matters of Ministerial questioning and relate mostly to particular geographies. It is probably the case that Ministers and their civil servants receive considerable lobbying about HE provision from MPs wanting it in their constituencies in particular levels or disciplines and so want it available and have the discretion to intervene in response to MP pressure where it is politically expedient to do so. The measures therefore go some way to explain the strengthening of the powers of the Minister in these proposals.

[p56, para 3] This demonstrates the point at which the political interests of the Minister and the logic of a market come up against each other, noting that the

Insolvency Regime takes precedence over political considerations pursued 'in the public interest'. This would assume to put the interests of capital, with investments in HE providers, ahead of those of the public.

[p54, para 3, question 1] This section arguably extends the power of the State significantly. It includes a number of questions that may be asked about circumstances under which the public interest should be secured, how it is defined, whether there is indeed an interest in sustaining providers rather than facilitating their exit, and whether the public interest should take primacy over investor interests or vice versa. The question provided thus steers the respondents towards a lesser matter - whether students should be able to expect that providers take care of them if the providers gets into difficulties. The subsidiary rider to the question references the suggestion earlier that the Student Protection Plan that are the basis of the 'contingency arrangements' creates barriers to entry, inviting private provider respondents to say that the costs of such a scheme would inhibit the likelihood of their entering the market, supporting the case for the removal of the protection.

Part C: Simplifying the higher education architecture

Chapter 1: A simpler system with students at the centre

[p57, para 1, heading] The familiar call to simplicity here, again with a phrase that secures widespread support putting 'students at the centre'.

[p57, para 1] It is interesting to note the introductory paragraph acknowledging that changes to the HE 'architecture' require approval from Parliament, perhaps anticipating opposition on the grounds of a wider field of political power, that of competition between the Executive and the Legislature. 'More efficient' is another 'common sense' application that assists in securing support.

[p57, para 2] This passage seeks to draw extensively on other texts from other organisations. Interestingly it quotes two bodies independent of Government and reports proposing changes to the regulatory framework. It uses them in an argument suggesting a longer policy concern over the regulatory system ('There has long been recognition that...') and uses emotive language to describe the need for reform (the regulatory architecture has 'become outdated'), though the reports quoted were all published in the preceding two years. It characterises the views of these reports as supporting the need for the body it is proposing. They do not. The quasi-academic referencing is a form of discourse technology highlighted earlier in this paper.

The HE Commission report did not propose 'additional protections for students' although it did recommend a number of reforms similar to those adopted by Government it was warning about the risks of liberating access to private providers rather than calling for greater liberalisation. It stated that 'We are concerned that there is a growing unregulated sector of higher education that may be offering insufficient provision to students. This has the potential to damage England's reputation as a leading provider of higher education.'(p17-18). It went on 'New market entrants are not facing the scrutiny they should, takeovers and complex corporate structures are being used to evade fundamental protections for

students.' (p.19). Its remedy was to create a 'Council for Higher Education' with a rather different emphasis.

The UUK report does indeed make the proposals as described here. However, the focus of its report is rather different, advocating a new regulator to maintain protections for existing universities and the use of risk-based regulation for the purposes of reducing the regulatory burden on universities. For example, in the conclusion to the report it states that 'It is essential that fundamental protections enshrined in the current higher education legislation are retained, notably those that maintain academic freedom and institutional autonomy through an arms-length relationship with government.' (p41) and in relation to the purpose of the new regulator that it proposes it argues that '...the main objective would be to protect the confidence in qualifications previously obtained from that institution and any current public interest assets such as degree awarding powers or university title.' (p40).

There is enough in the UUK paper to provide Government with an inter-textual foundation for its own policy proposals. It will be interesting to note the way UUK responds to the proposals, and whether the UUK 'Quality, Equity, Sustainability' report was an ineffective or effective piece of policy discourse in the dialectical development that the Green Paper was part of.

[p57, para 3] Favoured themes of 'a single' and 'light touch' regulatory system.

[p57, para 4] The attractive 'simplicity' appears again here. There is little evidence that the proposals actually lead to a simpler system, or any attempt to evidence how that is the case'. The metaphor of the existence of a 'higher education system' that is building-like, in that it can be represented as an 'architecture' is commonplace but also reinforced common-sense conceptions of how to think about higher education. Arguably a conception focused on curiosity-led research and the value of academic autonomy and the serendipity of research discovery might be equally as valid, and represented in other ways, such as an 'ecology' of learning. The 'architecture' emphasises order, structure, and control.

[p57, para 4, bullet 1] It is interesting to note that the interests of capital here are assumed to be so sacrosanct that they are deemed to deserve to have a system that promotes their interests alongside students and taxpayers on account of the need to 'ensure value for their investment in education.' Under the pre-existing or the proposed policy environment, employers make no investment in HE.

[p57, para 4, bullet 2] The level-playing field is emphasised as the favoured metaphor again. The word 'innovation' is again used assertively but its meaning left vague, as it has been throughout the document. 'Innovation' is regarded as a good thing - a common sense accepted norm. Without a definition, and with stress on the need to reduce barriers to entry and the regulation of 'new providers' it can be synonymous with falling quality which is difficult to measure and establish due to a system designed to be 'light touch'.

[p57, para 4, bullet 3] The paper uses the word 'safeguarding' in relation to reputation - a word regarded as generally positive.

[p57, para 4, bullet 4] Again, a familiar and popular phrase with universities, 'reducing the regulatory and administrative...burden' is used, following the discourse of UUK and frequent HEFCE documents over its history. The bullet point drops in reduction in 'regulatory and administrative COST...' as well, despite making no proposals to this effect in the Green Paper. The proposals in fact transferred the cost from the State, paid through general taxation, to the providers, significantly INCREASING cost to them.

[p58, para 1, bullet 1] Another favoured popular phrase and concept for the university policy respondents to agree with - 'institutional autonomy and academic freedom'. There may be a wider piece here in relation to enhancements to the CDA model. Policy documents often start with statements of principles and work 'down' to operational proposals. It is difficult to be held to the principles in relation to whether they have or have not been applied in practice as they are often subject to interpretation and judgement. In which case, where the intention is to get policy respondents to agree with you, it makes sense as a discourse technology to seek to use discourse that respondents will agree with in the 'principles' section of a policy document, as it disarms the respondent into thinking that the proposals are likely to be in agreement with their own views. Diametrically opposing views can be written instead into the more granular policy operationalisation, as they are less likely to be noticed there - the 'devil' really being 'in the detail'.

There is a further, more fundamental, point here about the importance of viewing discourse within context. The terms institutional autonomy and academic freedom are long established concepts applied, since Humboldt and the Enlightenment before him, to academic research and the best way for it to make the maximum positive contribution to society. The concept is founded on, and works within, a paradigm focused on pushing back the boundaries of knowledge. The academic institutions and their members who enjoy the 'academic freedom and autonomy' do so because there is confidence that and surpluses are reinvested within the purposes of the institutions. Indeed, many of these institutions are charitable bodies, required by law to reinvest surpluses in this way. It is a concept strongly defended.

It is a system where the values of the institutions are enshrined in law and form the foundation of trust and the principles at work in the habitus. When the principles are applied within the context of a market where the sale of higher education is a service that can be provided for a fee, profits taken and exported out of the education system or even the country, the principal of institutional autonomy and 'academic freedom' take on a very different significance. They become synonymous with unfettered free market capitalism. The concepts of one paradigm have been appropriated for the justification of another. Doing so represents a discourse technology, a way of exerting power, that CDA points to.

[p58, para 1, bullet 2] This sentence repeats the 'common sense' assumption that employers (who are involved in no financial transaction within the market of buyers and sellers that Government argues should drive higher education) are entitled to 'hold providers accountable'.

[p58, para 2] Interesting here is the use of time to signal relevance or irrelevance. The term 'It dates from the early 1990s...' in itself is supposed to set up an argument that it requires change. The remainder of the sentence supports this: '...when direct grant made up almost all higher education teaching funding.' and is designed to signal that the bodies are an anachronism. It is the discursal form that is used to strengthen the argument here, as the substance of the point is not in fact true.

The paragraph argues that the nine 'Government and sector owned bodies with a core role in the system architecture' date back to 'the early 1990'. HEFCE, UCAS and HESA were indeed founded in 1992, 1992 and 1993 respectively. However, BIS was created in June 2009; the SLC in 1989; OFFA in 2004; the QAA in 1997; the HEA in 2003; and the OIA in 2003. An argument might be made from these range of dates of foundation that the 'system architecture' had remained flexible and evolved to meet the requirements of the Government of the day. An examination of the detailed remits of the different bodies and how they changed over the period is beyond the scope of this study, but may similarly reveal each organisation changing its focus quite significantly over the period in question.

[p58, para 3] The simplicity of the typology of circumstances in which Government intervenes in higher education, the characterisation of these in market-actor terms, functions to force the reader into neglecting to think of other circumstances in which Government has intervened and does intervene. Even the current Green Paper shows examples of interventions not consistent with this typology, (such as the action against students unions).

[p58, para 4] Here, the argument in paragraph 6, that Government intervenes in three circumstances, if followed through to its operational logical conclusion, justifying the functions that Government argues are required of the systems architecture it is intending to sustain or create. The arguments for free market and restrictions on the measures to protect students' rights and access ('that people from all background can benefit from higher education') are justified in terms of 'efficiency' and the repeated, re-contextualised usage of 'institutional autonomy' as a justification.

[p58, para 5] 'The architecture of HE' is a useful word choice for 'regulation and bureaucracy' which the authors would appear to have in their mind given the proposals are 'to streamline' it - the most acceptable description of what is to be done with bureaucracy for Governments of all colours. used regardless of the actual measure being taken - as here, an increase in the levels of bureaucracy applied to the existing HE sector. As noted elsewhere, the argument has to be put forward as promoting the interests of students, even when the primary organisations to gain are privately owned HE providers.

This demonstrates the trust in the discourse power of the 'simplification' and 'streamlining' arguments, that the Green Paper is able to consult on whether the OFS (the single regulator with 'overarching responsibility' should sub-contract its responsibilities to the range of agencies whose existence was used as justification for the need for change in the system. The paragraph that follows (para 10) reinforces this by noting that the Student Loan Company will continue in its

previous independent form. The paragraph also signals the purpose of the organisation being to protect the interests of the customer (the student in this case), but without the identification of who the students need to be protected against - the paragraph is silent on who the negative party is likely to be. This is a common ethos display when measures favour the interests of capital.

[p58, para 6] This paragraph states that the prime strategic regulatory body of the NPM in HE era, HEFCE, is to be dismantled. The Act that created it in 1992 designated to it the power to act at arm's length from the civil service department and the prescriptions of the Government Minister, to the extent that many openly referred to it positively as a 'buffer body'. The Act also specifically restricted the power of the Secretary of State to the extent that they were prevented in law from interfering with the HE curriculum, amongst other limitations. It would be interesting to conduct a more detailed study contrasting the powers of the Secretary of State and HEFCE/OFS in the 1992 Act and the Green Paper, as being emblematic of the habituses of the different policy fields of the two eras.

[p59, para 2] Whilst presenting as independent of HEFCE since its creation, OFFA had in reality always operated from HEFCE, was originally staffed by seconded officers, and was closely aligned with the Funding Council's Widening Participation team.

[p59, para 5] It is interesting to note the lack of interest or prescription in relation to the form of regulation or the ways that bodies might perform the functions of 'allocation of teaching grant' and 'the financial sustainability function'. The Paper first asks for views then, in the following paragraphs, sets out a range of options. Given that the regulatory architecture has the potential to restrict the activities of private profit-making providers, is interesting to consider if the disinterest signals that there are controls of the parameters and powers of such bodies elsewhere in the proposals.

[p60, para 1 question 1] The questions are fairly open, with options and a lack of assertiveness in the sentence construction.

[p60, para 2, heading] The heading encompasses the 'simplification' technique of 'a single' system. In terms of word meaning, it is interesting to contemplate whether a regulatory 'system' can ever be anything but singular, given that the dictionary definition of a 'system' is 'a set of things working together as parts of a mechanism or an interconnecting network, a complex whole'. This is followed by another universal good (that something is 'transparent', and the metaphor 'light-touch' - again often [positively regarded].

[p60, para 3] This paragraph repeats previously introduced themes but the concentration of the arguments in one paragraph, combined with a number of discourse technologies makes this a piece of 'power discourse' and so warrants further attention. It relates to the new freedoms for alternative providers. There is the 'level playing field' metaphor, the repetition of 'does not', 'do not' and the penultimate sentence is laden with impassioned wording 'unnecessary, duplicative and burdensome', 'creating little value', adding unnecessary costs', 'holding providers back'. There is a sotto voce call to an egalitarianism and an evangelism for the new world - one where 'all providers...would be regulated on the same basis.'

[p60, para 4] A second power discourse paragraph. The repetition of 'single' and 'transparent', the frequent repetition of the phrase that reforms are in the interests of students, with the word student used seven times in six sentences. Favoured concepts of 'academic freedom' and 'institutional autonomy' are restated, and a commitment towards making teaching quality 'on a par' with research excellence. It is the argument for the new organisation that will have significantly less powers than HEFCE, its predecessor.

[p60, para 6] This paragraph is another summarising and re-stating earlier policy themes. They are superfluous other than for emphasis, with no new points introduced.

[p61, para 1, question 1] This question uses the metaphor 'light touch' in the question representing a discursal influence. It is surprisingly unassertive, asking if the changes to regulatory 'burden' would bring benefits or costs.

[p61, para 2] This paragraph over-emphasises, for little apparent policy reason, the Government's past support for students' union, its past funding of them and work they have previously done that the Government approves of. It describes them as playing 'an important role', but bounds that role to 'representing student views and promoting the provision of academic and other services.' The paragraph that follows combines the threat that this paragraph (para 23) appears to frame.

[p61, para 3] The paragraph makes inter-textual references to Trade Union reforms being pursued by Government and inter-discursive themes associated with the power of trade unions and students' unions. It conjoins the two organisations, despite them having very different roles, and raises questions that would arguably be no business of Government to ask. It asks a specific question that appears to target its attention and divert attention away from broader issues of students' unions, focusing respondents towards 'steps to create transparency and accountability to individual members.' There is no quoted evidence that there is any significant level of complaint or dissatisfaction with their students' unions amongst those who join them, despite there being questions relevant to this in the NSS.

[p61, para3, question 1] The question repeats the point about students' unions and their accountability, where there had been no evidence of a lack of accountability. The asking of the question and the assumption that there is a need to 'increase the transparency of student (sic) unions and strengthen [their] accountability (by asking a question as to 'what steps could be taken to increase' makes the common sense assumption that there is a need for such action or a problem to be solved, adds to the menace of this short section. It is interesting to note that students cannot be trusted to champion their own interests in the new HE system, but that a Government NDPB with constrained and defined powers granted from Government is created to do it instead. It might be argued that this raises questions as to whether the interests being protected or championed are indeed the students'.

Chapter 2: The Office for Students

[p62, para 1] The choice of the title of the new regulator 'the Office for STUDENTS' is significant in the values the authors are wanting to portray. It is intended to send a signal. Such signals, through the words chosen to name organisations exercising

power within systems, should be scrutinised. Is it that there is a congruence between title and function, or alternatively, has the title been chosen to convey a message and CONCEAL the real intent?

[p62, para 2] Despite the title of the new body, the Office for STUDENTS, its role is to 'empower, protect and represent the interests of [not just] students [but also] employers and taxpayers'.

[p62, para 2, bullet 3] As noted above, the meaning of the word 'empower' and of 'best choices' are interesting and contested. The choice of the word 'empowering' over other similar term such as 'enabling' suggests students will gain power in the market for HE, although it should be noted that 'empowering' is a commonly used and positively received term. Note that students are not empowered as consumers to make whatever choice they wish to make with their money, but are only empowered to make 'the best choices'. The vagueness is a feature CDA suggests should be examined: what is the best choice? Best for whom? This is not made clear, but elsewhere it is clear that students are only to be empowered when they make choices that Government regards as good choices, though this is not spelled out here.

[p62, para 3] These powers restate elements already detailed within the Green Paper and ascribe to the OfS duties and powers proposed as being required for the effective functioning of the whole system.

Another 'level playing field' is to be created here.

[p62, para 1, bullet 1] As noted above, the Paper asserts the importance of the OfS promoting the interests of students - arguably to conceal the limitations of its powers. Beyond the scope of this study, but it is interesting to consider policy implementation and market regulators. Even with the noted limitations on the powers of the OfS, the regulator might pursue vigorously the implementation of its 'duty', but how often do regulators act in the interests of consumers and how much do they operate within a field of regulation whereby the habitus does not allow regulators to consider the more significant sanctions against capital, with the dominant field logic being that this constrains the point of having a market system in the first place.

[p62, para 1, bullet 2] A nod to university concerns but as noted above 'institutional autonomy' takes on a different significance in a market system where profit-seeking is a legitimate and encouraged purpose.

[p62, para 1, bullet 4] It is interesting to note that despite the heavy emphasis on tackling access to HE for disadvantaged students, doing something about this is not a responsibility of the OfS, which is required to report annually on this and require providers to produce access agreements which are supposed to improve access, yet the OfS acquires no duty in this regard itself.

[p63, para 1, bullet 1] As discussed above, this ascribes to the OfS the right to require UCAS (a body dominated by established universities which has resisted Government attempts to force it to release data about applications) to provide it with data and information on very broad terms 'where it is needed in order to improve student information...' It is a power that could arguably allow OfS to

require any information it required - any information provided to a student could be defined as 'student information' and 'improvement' in such information could be judged by the volume of it available. Therefore, the more information provided to a student, the more 'student information' is improved, particularly as Government ascribes to the OfS the responsibility to improve access.

[p63, para 1, bullet 3] This paragraph transfers power from the Privy Council, to the OfS, a body more firmly under the control of the Secretary of State - thereby empowering the Minister.

[p63, para 2] This is a piece of power discourse, probably because how a new regulatory organisation is to be paid for will be a consideration for the government department in negotiations with Treasury. It is also potentially controversial as it is a signal of the paradigm shift: public universities in receipt of government funding under the NPM model (and before that) would not have expected to pay for Government to distribute that funding to it. The shift to market regulator seeks to impose a new charge on universities. It uses inter-discursive connections, drawing parallels between paying a subscription for a market regulator and paying for those organisations that provide services to universities, feeling the need to emphasise that such models 'are commonly used' and are 'similar'.

Furthermore, as the purpose of the legislation is to facilitate private sector access to HE, the proposals weight the costs of regulation to fall more heavily on existing, larger, university providers, despite the costs more likely to arise in relation to new providers that are higher risk and more volatile. Anticipating the opposition to this, the paragraph seeks to diffuse opposition through saying that Government will 'look at the case for additional fees to be charged separately,' but uses vagueness and restrictions to the bounds of this consideration referring to 'the more expensive applications and processes' - arguably difficult to define and thus unlikely to be applied in practice.

[p64, para 1, question 1] The question here appears straightforward, in two parts, yet the second part in relation to a vaguely defined 'subscription model' gets as much invited questioning attention as the whole powers and duties of the OfS. The failure to unpack the issues associated with these powers and duties suppresses the likelihood of receiving challenge to them.

[p64, para 2] This paragraph de-emphasises the significance of the 'proposed statutory duties and powers of the Secretary of State' with the second sentence 'The majority of these are existing powers, or mirror the powers and role of the Secretary of State in relation to HEFCE in the current system.' Two words are key: 'majority' and 'mirror'. It is not generally the number count of powers that are important but the significance of the reach of a designated power. Similarly, the term 'mirror' is vague, allowing space for changes to emphasis. Changes to context also make some powers more significant than previously. HEFCE had certain powers designated to it by Parliament, regardless of the powers of the Secretary of State. The proposed changes may change (and diminish in some areas) the powers of the OfS in comparison to the HEFCE, meaning there is a change in the BALANCE of power between the Minister and other organisations. CDA advises to look for

vagueness and context shifts, alerting the reader to the need to examine the section more closely.

[p64, para 2, bullet 1] In the 1992 FHE Act the powers of the Secretary of State were restricted. With these new proposals repealing or replacing the 1992 Act, the power to give direction can be re-cast. Again, the second clause, justifying the proposal, suggests opposition is anticipated and that readers will see additional powers being taken. This plays into a discourse dialectic in another field, between Parliament and Government, where Parliament is often minded to limit the discretionary powers of ministers and ministers to maximise those.

[p64, para 2, bullet 2] As noted above, the words 'institutional autonomy' and 'academic freedom' have different meaning within a market of profit-seeking HE providers and effectively sets an expectation that the Minister cannot challenge the activities of private organisations.

[p64, para 2, bullet 3] This presents the power to set tuition fee caps as a common sense proposal, one that is 'essential' to enable the Minister to act in the interests of taxpayers. The policy points not mentioned are that this is a power previously held by Parliament, and so represents an extension of the power of the Executive. As such it is perhaps disingenuous to say that it is 'essential' - changing the meaning of the word through changing its context - it may be desirable that some person or organisation does not allow unlimited growth in fees and the Government-backed loans that fund them, but the discourse removes the potential actors from the discussion.

[p64, para 2, bullet 4] This changes the context of a power - the power to provide direction, and applies it within a different temporal dimension. The Secretary of State had previously had the power to provide guidance to its NDPB - HEFCE - which they did annually in a letter of guidance. The temporal context proposed here is more immediate: to 'respond to issues arising'. The discourse is interesting as it presents the power as a distancing of the Minister from day to day affairs within higher education ('without intervening directly') in a passage that takes greater powers.

[p64, para 2, bullet 5] Again, the temporal context changes from the previously existing relationship between HEFCE and the Minister in a section proposed as continuity. The more immediate timescale defined for advice, data and information the Minister may want ('as they may from time to time require' keeps a high degree of control and a low degree of autonomy for the OfS in comparison with HEFCE.

[p64, para 2, bullet 6] Having established an organisation that is required to respond to the Secretary of State's day to day requirements for reports, information, data and action - a significant change, this seemingly innocuous paragraph proposes that 'ministers' (plural) should be able to require the OfS to carry out other 'functions' in the wide field of 'education', thus significantly extending the potential controls it could exert from the previous situation where the remit of the NDPB (HEFCE) were closely defined in the 1992 Act that created it.

[p64, para 3] The conventional paragraph structure makes a proposition in the first sentence and then explains or justifies it in the subsequent sentences. This

paragraph adopts this form but the meaning of the paragraph does not have that lexical cohesion. The first sentence sets up the reader to expect measures to 'ensure that high standards are not threatened.' The sentences that follow however detail a range of measures short of 'removal from the system' that Government expects the OfS to take. It prepares the reader for a reduction in regulatory control of new private providers as opposed to a system that applies its ultimate sanction of removal in the interests of maintaining high standards.

[p64, para 4] This paragraph would appear from its emphasis to run counter to the main body of the Paper. CDA cautions that a lack of lexical cohesion may signal a significant element in the discourse. It may be, given the subject content, that this paragraph is a result of negotiations in the cross-Governmental field, where Treasury required the rights to enter in order to recoup what it anticipated may be financial losses from new private providers. The paragraph that follows it (para 8) would appear then to seek to qualify and limit the instances where such search powers are to be exercised.

[p65, para 2] It is interesting that this paragraph is almost apologetic about the proposals made in the previous paragraph 'applied using a risk-based approach', 'limited to specific circumstances', include safeguards for ...providers' It also seeks to suppress opposition from powerful university interests by vagueness in a commitment to limit the providers that are to be subject to this treatment.

[p65, para 2, question 1] The questions draw attention to the interest in limiting the scope of the proposals that the Paper makes. It is argued that this is due to the proposals not deriving from the government department drafting the main body of the paper.

[p66, para 2] A familiar use of time to add force to the argument for change - pre-existing arrangements dating to 1988 are 'now out-dated'. The paragraph also assertively states that arrangements are 'unnecessarily restrictive and burdensome'. The verb-object phrases are emotive 'stifle innovation and growth', 'slow down institutional change', with a number of concepts taken for granted as common sense - change is good, innovation is good, growth is good, and any restrictions on enterprise is bad. The ever-present 'level playing field' metaphor is used again. The changes proposed take a further step in moving a class of previously overtly public-sector organisations to becoming private organisations, no longer required to seek approval from Privy Council to confirm that certain changes are consistent with the public interest. The erosion of the public, the assumption of the supremacy of the private enterprise as the favoured organisational form, amongst the various forms that co-exist in the English HE system, are all present here in the discourse sub-text.

[p66, para 3] Marketised discourse here again, with the assumption of the value of enterprise. Verbs stating the intentions of Government are characterised in familiar forms - 'to deregulate' and to 'modernise', 'to innovate', to 'respond to business opportunity'. Adjectives are similarly positive: 'equitable' footing, 'Greater' freedom. 'Flexibility'.

[p66, para 5] It might be regarded as surprising that Government included this proposal within the Green Paper. There remains considerable heterogeneity within

the HE system in terms of constitutional arrangements, so why was this particular reform important to Government? Underlying this paragraph, which provides a rationale for changing the constitutional arrangements for HE Corporations (HECs), is a commitment to the market. The one example provided for the pre-existing arrangements being a problem is that lenders regard HECs as having lesser powers than other types of organisations, such as incorporated companies. It might be argued that Government's goal is generate profit from the public. If lenders do not believe HECs have full control over their assets, then those assets cannot be applied as security for investment loans. This proposal 'releases' these public assets to do work to generate profits for lenders.

[p66, para 6] This whole section is written as if it is a technical and non-political issue. There is a lexical cohesion, and conventional structure of argument. This paragraph still includes an emotive adverb ('unnecessarily' prescriptive) in argumentation.

[p66, para 7] This paragraph lacks a cohesion in terms of arguments earlier in the Green Paper. Here, HECs are 'mature and autonomous institutions'. They are not 'HE providers' nor problematic 'incumbents'. The discourse flatters the organisations and seeks to empower them, whereas elsewhere they are disempowered in favour of the new entrants. As noted above, this is perhaps because this measure provides the mechanism to transfer public assets to private use, and is therefore part of a wider discursal and policy agenda across Government.

[p 67, para 1] A further extension to the application of public assets to generate private value, the proposals here enable HECs to change their organisational form and transfer their assets. It is presented as a rationale disempowering the Secretary of State in favour of empowering ('in recognition of the maturity and autonomy of the HECs') the HECs. The Secretary of State removes themselves as an actor that will in future have no role in a process of increasing private ownership of public assets and the use of public capital to prepare the foundations for the creation of a profit-making entity (even if the assets must be transferred on dissolution to serve the purposes defined in the Articles and instruments (which HECs are also to be empowered to amend).

[p67, para 2] The proposals here recognise the interests of philanthropists or public bodies that gifted assets to HECs as other public bodies. Provision is made to provide such interests, with 'some' protection (note the qualifying adjective). The measures proposed do not actually create controls that might limit the transfer of assets arising from a dissolution of the HEC, merely to inform the regulator of the Corporation's decision. Thus, no limits are put upon the transfer of public assets to do private profit-making work.

[p67, para 3] The straightforward paragraph of procedural arrangements in the event of a HEC being liquidated contains a tangential reminder that the proposals allow the use of public assets to meet the liabilities developed through corporate risk-taking and misadventure - a further mechanism to enable public funds to be transferred into private ownership - to service debts run up by HECs.

[p67, para 4-5] Proposals implicitly make a choice between the different organisational forms available to HE providers and opt for the private company as the preferred organisational form, ostensibly so that HECs are not 'put...at a disadvantage compared to newer providers...'. This disadvantage is the commitment to serve a public interest.

[p67, para 6-7] These two paragraphs illustrate how significant developments with potentially wide-ranging implications are 'hidden in plain sight' yet off the critical path of an argument. No evidence is presented that universities that are HECs see a need to remove provisions requiring them to meet the tests of what is in the public interest through the Privy Council, though the implication is that universities find these arrangements slow and 'burdensome'. The remedy however is 'to review...the current principles of the public interest, and to issue a further Ministerial letter...'. Such as review could define 'public interest' rather more narrowly and had previously applied, releasing even further the constraints over transfer of public assets into the private realm. The longer-term arrangement involves less 'burden' and is considerably more vague as to controls over misuse of public assets.

[p68, para 3] Implicit in these paragraphs is the primacy of the private form of organisation and the desire to move providers of HE in that direction. Arguments deployed include the creation of a level playing field, the reduction of 'burden' and regulation and the purported financial costs (such as of complying with the Freedom of Information Act, which are claimed, but not evidenced, as being £10m per year). The default position becomes the private form, accepting that 'we may wish to consider some exceptions to this general rule...', probably to assuage concerns from research intensive universities with tax benefits from public body and charitable status.

[p68, para 4, question 1] The question and its framing leads the respondent to particular conclusions. The changes are described as 'deregulatory measures'. Having made the case in the preceding paragraphs for the value of the proposals in reducing burden and framed the discussion of the costs of the pre-existing system with a spurious reference of £10m for FOI compliance alone, the question then asks about those specific dimensions of the proposals.

Part D: Reducing complexity and bureaucracy in research funding

Chapter 1: Research landscape

[p69, para 1, heading 1] A familiar 'common sense', popular theme of 'reducing complexity and bureaucracy' that will not cause concern amongst the constituency to which it is addressed: research-intensive universities.

[p69, para 1, heading 2] Interesting choice of metaphor ('research LANDSCAPE') contrasting with the 'HE SYSTEM' or 'architecture' applied to the other activities of the sector.

[p69, para 1] This follows a familiar theme of 'UK research is the best in the world', Government invests in it and is partly responsible for that excellence, there is nothing requiring change here. Contrast with the starting paragraph in relation to teaching which says 'English teaching is the best in the world, significant change is

required to bring private providers into the sector in greater numbers.' Credible research evidence is referenced, with specific and verifiable claims.

[p69, para 2] Note that in this section the paper is talking about UK plans (where coherence with policies in the devolved nations of the UK is such that explicit recognition of the divergence is not required). It is interesting to note the alternative rationale for research funding to teaching funding. In research, the argument construction is that Government investment produces positive impacts in other aspects of the economy, connecting to wider Government policy around economy, productivity and indeed 'wellbeing'. The same argument could have been put for Government investment in higher education, yet the narrative was about private benefits and the legitimacy of transfer of the burden of financing HE from the State to the individual. Productivity benefits similarly accrue but were not referenced. It might be asked 'Which institutions benefit most from this protection of direct Government investment?'

It should be noted that though the academic research sources referenced are more robust, the research studies are commissioned by Government departments or lobby organisations with a particular agenda to pursue. This policy plays into the wider field of negotiation of departmental budgets for different Government departments and for Government investment in research over other potential investments. The study referenced here was commissioned by the Campaign for Science and Engineering, the studies in the preceding and following paragraphs were both commissioned by BIS which has an interest in highlighting to Treasury the wider Governmental benefits of research investment. Secondly, two of these studies are used to present estimates of the wider financial impact of Government investment with respect to investment or productivity elsewhere. Such macro-economic calculations are difficult to establish with a degree of certainty, particularly if causal connections are claimed (they are implied here not stated).

Finally, whilst the use of academic referencing here is more methodologically sound than in the earlier sections of the Paper, their use still represents an attempt to bolster a policy argument, irrespective of whether the studies referenced do indeed reach the clear, simple conclusions stated in the Paper. It is interesting that in a section designed to speak to those most interested in high quality of research, there are seven reports referenced in five pages, each of which a published document, compared to 48 over the preceding 68 pages, many of which were newspaper articles, blog posts or unpublished documents.

[p69, para 3] This section is assertive in its claim that 'Government investment in VITAL', and that there is 'strong evidence...', and levels of collaboration between business and academia being 'increasingly important' to the economy. Such 'benefits of co-investment' arguments were not made in respect to HE teaching, where no contribution was mentioned from private (non-student) sources. The statement about increasing importance of links is not referenced or supported by the report referenced. Furthermore, the Global Competitiveness Index, used here to justify Government investment in research, does not have that investment as a primary category or sub-category. The report shows the UK's position falling from 9th to 10th since the previous year, with 'macro-economic environment' the UK's lowest ranking category, at 108th in the world. The report highlights that 'The UK

can count on a well-educated workforce, contributing to high levels of technological adoption and ICT penetration.' (Schwab, 2016, p25).

[p69, para 4] There are considerable inter-discursive and inter-textual connections in this paragraph which signals the continuity of existing arrangements to research: 'funding excellence wherever it is found', 'researchers deciding which research is funded', and 'the dual support system whereby underpinning Government investment is made in research institutions (mostly universities) to support quality foundations, with individual research contracts won through competitions.'

[p69, para 5] This paragraph further clarifies for research-intensive institutions that no change is planned with the demise of HEFCE.

[p70, para 1] The paragraph is almost deferential in its policy aspirations. It references a review of research Council's, mentioning the chair of that review by name and subsequently referring to him as 'Sir Paul' on three occasions. It clarifies that Government is 'not pre-empting' this review, which will itself be 'critical' in deciding what goes into the White Paper.

[p70, para 2] These bullet points for review signal no real changes, other than the common sense, ubiquitous 'minimise administrative burdens...' 'the system' imposes on scientific and research leaders.'

[p70, para 3-5] This section adopts a similar approach, referencing other reviews, stressing the continuities and absence of a Government intention to change things, despite HEFCE being removed from the 'landscape', emphasising that 'dual-support' will continue.

[p71, para 2] This paragraph would appear to speak to Treasury, university-leaders and a third group 'discipline specific leaders' in proposing to 'reduce complexity and bureaucracy'. For Treasury, a commitment to a lower administrative overhead to maximise the impact of Government funding would be important. For university leaders a reduction in bureaucracy, and for discipline leaders an assurance that they will play a key role in the new landscape in their own right. This recognises an interesting feature in university elites. In most cases, university leaders, vice chancellors, are afforded greatest significance, but in research individual research leaders, whose affiliations and influence may be regarded as extending beyond their institution and the management hierarchies that exist within it, have particular personal influence in their own right. This influence is buoyed by professional societies with long-standing positions of elite power, such as the Royal Society. It is nonetheless signals the continuing influence of individual research leaders and disciplinary organisations within elite circles, in that Government sees fit to give them specific mention in this section.

[p71, para 3] Again, Government would appear here, in the concluding paragraph, to be keen to stress what little it intends to do in relation to research. The message is that it is creating continuity in research activities while making adjustments in teaching that will affect non-research intensive institutions that will be the subject of increased competition. 'Sir Paul Nurse' is referenced again, as is the commitment to other pre-existing ways of working and institutions within the landscape.

[p71, para 4] The questions reference the independent review by Sir Paul Nurse (again) and make the assumption that respondents will want to see continuation of the dual funding system, moving to a different level to ask practical questions about how to do it rather than whether it should be done.

Chapter 2: The Research Excellence Framework

[p72, para 1] Given the arguments earlier in the Paper about mirroring the REF with the new TEF, it is perhaps surprising that no reference is made here of the TEF proposals, as might have been the intention if a coherent whole were intended for the HE system. The section was probably written by a different set of authors and consultees, but it is also interesting that in final editing no reference was proposed. This perhaps reinforces the view that the purpose of 'Part D' was to assure powerful research-intensive universities that the reforms will not damage those things they care about, and the purpose of Part A was not to be a long-term feature of the HE landscape but to divert attention away from the radical funding reforms in part C.

[p72, Para 2] A further paragraph that serves the purpose, with academic references, of reassuring research organisations that Government believes this is an area where no new policy is needed.

[p72, para 3] The 'common sense' and ongoing debate about how to reduce the costs of a thorough peer-review exercise is played out here with evidence, but without any suggestion that major change will be made. Incremental improvement would appear to be the message.

[p73, paras 1-3] These paragraphs continue to signal the ongoing debate about how to improve the efficiency of peer-review and how to use data effectively in the process. A significant report 'The Metric Tide' is referenced, with attention drawn to the fact that it is 'an independent report', but the overarching message is that no significant changes are proposed. Some years earlier, the Chancellor of the Exchequer, Gordon Brown, made a bold and unexpected policy pronouncement in respect to the use of data in the Research Assessment Exercise (the forerunner to the REF), which was seen to have done some damage to Government reputation amongst research elites. It is possible that senior civil servants were keen to avoid any such suggestion that Government was planning something similar, hence the continuing reinforcement of 'no significant change and change only where powerful forces within the sector demand it.' Government would appear to have little interest or confidence in policy change in this area.

[p73, para 3, questions 1-3] Questions are focused on the operational level, away from the conceptual or principle-level. Given the limited consequence of the answers to the questions, a number are posed, without any particular direction other than to signal incremental improvement.

Endnote

The summary of questions, 'next steps' section on how to respond, and annexes have not been analysed in detail using the CDA methodology as they were judged as not having a significant contribution to the overall policy proposals being made in the Green Paper.

Appendix V: Power discourse – The Policy Wonk’s Guide to Influential Policy Writing

Introduction

Can the CDA analysis help with policy writing and what form of discourse should be used to communicate the lessons effectively? The CDA methodology of analysis has shown to be effective in many contexts, including, through this thesis in analysing policy discourse. Policy discourse is produced by people: policy actors. Effective policy actors use discourse technologies to influence policy formulation and decision-making, whether consciously or unconsciously. It is proposed in this appendix that knowledge of these technologies can help policy actors to produce more powerful policy discourse.

The process of writing to get those messages across, is, like all discourse, a matter of writing for the audience in question and finding a discursal form that persuades the reader to adopt the techniques and recommendations put forward. A review of such self-help or management development guides aimed at practitioners shows that many adopt an informal style, with minimal academic references or footnotes, and a great deal of use of bulleted lists (for example Kennedy, C. (1998) or the seminal ‘How to Win Friends and Influence People’ (Carnegie, 2017)). Often they are stylistically almost tongue-in-cheek, such as the popular ‘Bluffers Guides’ (for example Winterson-Richards (2013)). As the aim is to influence practice, this form of discourse is therefore used in the section that follows, in the communication of techniques identified in the Green Paper through the application of CDA methods and the power analysis of Bourdieu. Further testing with potential audiences would be required but it may be appropriate to use it to form the basis of a subsequent publication.

Power Discourse – The Policy Wonk’s Guide to Influential Policy Writing

Why read this guide?

Are you required to write policy you don’t believe in to persuade others of a particular point of view? Wondered how some policies get through the ideation and consultation stages relatively unscathed? Then this short guide is for you. Based on extensive research into what forms of discourse work, it will help you to understand the hidden power behind all effective writing – how to write ‘between the lines’ and get your readers onside with your arguments. It is organised into sections to drop into and techniques to apply to get the power into your policy writing in no time. If you want to see more and work through some exercises to hone your skills, the sister book ‘Power Discourse: The Workbook for Busy Wonks’ (Mackney (2023) in preparation) has policy examples from across policy domains and some exercises to try. Below you will find twelve simple rules for increasing the

power of your policy writing. Put them into practice and see your personal impact transformed!

i. Know your mark

All policy writing is about influence, about persuading people your views are right.

In short it is all about power. The first stage is to understand who you are trying to influence.

Analyse your readers

Identify their values

Look at their discourse and mirror it

Follow popular discursal themes. People often hold onto key texts like quasi-religious truths. Find them. Use identifiable references to the texts, borrowing words and phrases.

Look at the current hot topic words in your area of policy. For HE policy some words were: social mobility, widening participation, diversity, reducing burden, academic freedom, and institutional autonomy. If you are not sure or don't have time to read up on the area of policy, dump a corpus of text from websites like Wonkhe or HE policy social media feeds into Wordcloud¹ and find the top words in current usage. List those, write them down, you will want to use them later.

If you are in Government, please your boss's boss and skim wider government policy documents to identify bigger themes that will push buttons across Government and get endorsement for the policy at Cabinet

ii. It's not what you know, it's who you know

If you think policy discourse just sounds like good old common sense to you. You are clearly mixing in the right circles! Frankly, if you are reading this guide, you are probably half-way towards being who you need to be.

Or perhaps you are so born to rule that you are affronted by this cynical faux academic analysis. That's fine too. If you can pull off these techniques because you were born into networks of people of high influence, who make the difficult decisions to keep our country running smoothly, then maybe you will just exude and adopt these approaches naturally.

If not, then start mixing with people who you respect as policy actors, and you will be acclimatised to their ways, absorb their approaches, feel comfortable as their language finds its way to the tip of your tongue or your fingertips on your MacBook.

iii. Appear clever and well-read

Innocents think that policy is based on evidence. Your task is probably to find evidence to support a policy idea. Remember that!

When you have googled some of your key topics, use academic referencing to refer to them in footnotes or endnotes. If you don't have real research to reference, still present links to related documents as academic references, even when they are newspaper articles, blogposts or reports of reports.

Reference a big report and claim it supports your argument - few people will have the time or inclination to check whether it does!

¹ A graphical representation of the frequency of usage of words in a document or corpus. See for example www.wordcloud.com.

- iv. Waste other people's time, not your own
Policy respondents are busy people, with limited time to write responses, don't give them lots of time on the sections they might oppose - indulge their pet interests, absorb their time in the areas where they are likely to agree with you or where you do not care about the outcomes. They will run out of time for the other bits.
- v. Seek Agreement not Responses
Present your ideas as a consultation, people will expect it - but don't treat this as an invite to them to tell you what they think about the policy
Ask questions you think they will agree with you on, avoid those that might stir opposition
Don't ask questions if you are not confident of the answers
Frame the opportunities to answer – it lets you ask the question but influence the answer
Ask really complicated questions if you know what your readers are thinking, they will probably replace your question with a simpler one that they can answer!
- vi. Write for idiots: Keep it simple
Sometimes policy is just about being seen to do something, even if it doesn't actually do something - sometimes your minister will just want something that makes them look good but spends no money and changes nothing. Use simplification as a device to make the world seem simpler - the respondents will thank you for that, helping them to apparently navigate a complex world.
The world is a complex place. People struggle with complexity. Tell them it is a choice between two things: an undesirable option and the option you want them to support. They will forget the nuance and breathe a sigh of relief.
Your presentation of simple solutions to complex problems will also make you look like a genius!
- vii. Hit them with your best shots
Work out what you really care about. Save your efforts around techniques to deploy for these sections and bring out the big guns - use everything here – sentence structure, word meaning, word choices, forms, questions, frames, simplification, adjectives
Say it with feeling: Hit them at their heart, stir the emotions
Talk numbers to Treasury, talk emotion to everyone else. Use emotive wording
- viii. Fog, Flip, Meander and Draw
Use vagueness when you think the readers will oppose
Don't mention the things that will annoy or the weaknesses that will expose your policy intent
Bore people to lower their guard, use your dullest prose to hide your fiercest plans
Avoid words that stir anger and passions
If you are required to mention something unpopular in the text, make the main point, in the critical path of your argument, something that people will agree with and slip the unpopular idea into a sub-clause.
When you run out of steam in big ideas or principles, switch to the operational and practical levels and gain acceptance of the means, so they forget about the ends.

Use the language of aphorism, homily, and familiar metaphor to divert critical scrutiny. Bend the meaning of words to fit your purpose

Use acronyms to exclude those you don't really want to respond

Draw diagrams with arrows

ix. Focus on Special Interests

Capital Ideas I: Whatever your party, you are likely to need to write a policy that favours capital. That is often not popular with voters. You are probably wanting to limit the influence of public sector organisations. Choose arguments in favour of the consumer - it is the voter friendly face of marketisation and allows you to create an environment where capital wins.

Capital interests II: often you are caught between empowering capital and empowering the State - again, use the language of the consumer, it is helpful to allow measures that do both whilst not empowering the consumer at all

Forget the science of policymaking as an objective process, focus on who you are working for and what they want. Your masters know what they think, know what they want to happen and know that the policy can enable them to make a name for themselves. Write with that aim in mind, bend others to your will.

If you need to persuade people of TINA (there is no alternative), describe the world without agents or actors. Readers will forget that there are people pulling the strings.

If the Prime Minister says something vaguely related to your policy, stick a reference to it in a paragraph next to your own policy idea.

Yoke the powerful to your policy with multiple forewords to your policy, giving them responsibility for it and an interest in its success.

x. It's common sense stupid

Repeat your core concepts and labels until it is embarrassing - call a dog 'Kitty' once and people will think you are mad. Say it twenty times and people will think it's the new fashion and will start using the name you are using.

Find the policies everyone agrees on, tell the story of your policy's connection to it - e.g., in English HE all policy must be traced back to Robbins in 1963* *unless talking to a historian, whereas all has to date to Humboldt in 1810

Go with the flow.

People like continuity. Find something popular and position your policy as a continuation of it. Create a history to your policy even where it has none.

If your minister has been politically embarrassed by a previous event in their portfolio, write a new policy that puts responsibility for it far from the Minister's door. Be sure to point this out when you have drafted it. This will be more important than the logic or ideological purity of the policy and will be a career enhancing move.

xi. Tell them what they told you

When you are writing up the results make it look like a fair analysis and use a form that makes it look like you have accurately synthesised their responses. Draw out only the messages that are positive, group detractors responses in categories where they are always a minority.

Report things positively. Ignore those things that don't align or deploy vagueness and ambiguous word meanings to describe your synthesis

Remember: most people won't bother to read the synthesis report in detail, they want to know what you are going to do next

xii. Work the room

If your policy document has been about neutralising opposition, don't forget to work up support in the forums where deals are really done

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