

THE GREEN PAPER

Introduction

In *Everything for Sale?* with Helen Carasso (Routledge, 2013) the writer argued that the main changes in higher education policy over the past thirty or so years could be explained in terms of the progressive marketisation of the system by governments of all political persuasions, a process that began with the Thatcher Government's abolition of the subsidy for overseas students from 1980. The Green Paper *Fulfilling Our Potential: Teaching Excellence, Social Mobility and Student Choice* (BIS, 2015) published on 6th November represents the latest stage in this process. This short paper describes the main proposals and offers an initial assessment.

Background

First, a brief recap. *Everything for Sale?* identified the following key stages in the marketisation process:

- the separation of public funding for teaching and research, and the introduction of selective research funding, from 1986;
- the increase in the level of the still-subsidised home tuition fee in 1989, and the corresponding reduction in the institutional grant for teaching;
- the introduction of 'top-up' loans for student support from 1990;
- the abolition of the 'binary line' between universities and polytechnics in 1992;
- the introduction of top-up fees of £1,000 in 1998;
- the changes in the rules for university title in 2004 to enable institutions without research degree awarding powers to obtain a university title; and
- the introduction of 'variable' fees of £3,000 in 2006.

Under the Coalition Government, the fee cap was increased to £9,000 and most direct Government funding of university teaching disappeared: in effect, a voucher system of funding was introduced (as originally suggested by Milton Friedman in 1962). The limits on the numbers of Home and EU students universities could recruit were raised and then abolished. The amounts of officially sponsored information for students (the National Student Survey, the Key Information Set) were increased. Finally, the conditions for organisations seeking degree awarding powers and university title were eased.

The rationale for these changes was that both quality and efficiency would be increased if universities were subject to greater competition, including from alternative providers from the voluntary and private sectors. With fuller information about institutions and programmes, students and their sponsors would be better able to choose between competing suppliers. Universities that did not raise their game in response to these choices would face a damaging loss of support, and might even disappear altogether.

The Green Paper - Description

The Green Paper implies that both quality and participation have increased as a result of these policies and institutions' responses since the full fee regime came into effect in 2012. However:

More needs to be done to ensure that providers offering the highest quality courses are recognised and that teaching is valued as much as research. Students expect better value for money; employers need access to a pipeline of graduates with the skills they need; and the

taxpayer needs to see a broad range of economic and social benefits generated by the public investment in our higher education system.(page 18).

The Teaching Excellence Framework

The main (and much trailed)¹ proposal for achieving these is the Teaching Excellence Framework (TEF). The objectives are to:

- *place a spotlight on teaching and encourage excellent teaching for all students;*
- *help institutions improve the quality of their teaching by highlighting exemplary practices;*
- *build a culture where it is recognised that teaching has equal status with research within and across HE institutions;*
- *support and where possible stimulate the sector to help students meet their aspirations by providing them with accessible and clear information to judge teaching quality across courses and disciplines – in the same way they can already compare a department’s research rating;*
- *help employers to identify and recruit graduates with the skills they require by providing better and clearer information about courses and degree outcomes;*
- *recognise those institutions that do the most to welcome students from a range of disadvantaged backgrounds, support them to remain on their courses...and help them to progress to further study or a high skilled job;*
- *reflect the strength that comes from the diversity of our higher education sector and be flexible in recognising different types of excellence; and*
- *demonstrate that the quality of higher education is a priority in our country, and to provide a clear way for students in England and from other countries to identify institutions that demonstrated this.* (pages 18-19).

For 2017-18, all providers with a successful current QAA review will be assigned to Level 1 of the new framework. The Government will determine the appropriate fee cap level and the fee loan cap uplift. From 2018-19, providers can apply to be placed at a higher level where they will be able to charge a higher fee through an inflation uplift. It is not yet clear whether there will be 3 or 4 levels. The placing will last for 5 years, or possibly 3 years renewable for a further 2. The intention is clear:

The TEF should change providers’ behaviour. Those providers that do well within the TEF will attract more student applications and will be able to raise fees in line with inflation. The additional income can be reinvested in the quality of teaching and allow providers to expand so that they can teach more students. We hope providers receiving a lower TEF assessment will choose to raise their teaching standards in order to maintain student numbers. Eventually, we anticipate some lower quality providers withdrawing from the sector, leaving space for new entrants, and raising quality overall. (page 19)

The applications will be assessed by independent panels of experts, comprising academics, students and employers. Although the awards will be at institutional level, the aim is to move to disciplinary panels as soon as possible. The foci will be teaching quality, the learning environment, and student outcomes and learning gain. Initially, the metrics used will be taken from the Destinations of Leavers from Higher Education, HESA (retention and continuation), and the National Student Survey. Future metrics could include the student commitment to learning, the training and employment of staff, and teaching intensity (the time students are studying and/or the proportion of time staff spend teaching). In all cases, care will be taken to allow for students’ backgrounds. The assessments will be on a rolling basis.

Overall:

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. Better student choice and better informed employers are also likely to lead to greater diversity in provision. (page 20).

Social mobility and widening participation

The Green Paper refers to the Prime Minister's ambition of doubling the proportion of people from disadvantaged backgrounds entering higher education by the end of the current Parliament from 2009 levels. The Government 'wants to see a clear focus on these issues by University leaders and develop innovative and new approaches to some of these long standing issues' (page 38). One option would be for the new Office for Students (OfS, see below) to set targets for providers that are failing to make progress on agreed WP goals, or where the outcomes for specific groups are below expectations. The OfS could also have the power to refuse to approve an access agreement if an institution failed to achieve its targets 'without good reason'.

New providers

The Green Paper proposes 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' (page 42). But even within the current legislative framework there are a number of steps that could be taken to lower barriers to entry: alternative ways of getting assurances on quality and financial sustainability, without new entrants needing time to build up a track record; conditions under which Government could grant multi-year specific course designations to alternative providers; and combining common elements of application processes. The new single route would give quicker access to student funding (and no cap on student numbers); the ability to apply earlier for degree awarding powers (DAPs) (with a more flexible approach to track record); a shorter time for DAPs assessment; and the ability to secure university title much earlier, if conditions are met. The Government is also envisaging opening up the supply of degree course validation services to a wider group of organisations, including possibly the OfS itself (a classic conflict of interest if ever there was one).

Provider exit

The Green Paper announces the Government's intention to introduce a requirement for providers to have contingency arrangements in place that set out the approach and commitments to students in the event of provider exit, or course or campus closure. This would cover both continuity of provision and financial recompense (though this would need to be carefully designed so as not to create a barrier to new entrants). In addition, the OfS could support (and if necessary direct) regulated providers² to consider whether and how the provider should exit the sector in an orderly way, where it is in the public interest to do so. It is incidentally clear that the person drafting this section of the paper has not the remotest notion of how complex and difficult 'exit situations' actually are in practice.

Regulatory architecture

The Green Paper proposes that a new 'arms length' body should be created with a duty to promote the student interest: the Office for Students or OfS. It will be created initially from HEFCE and OFFA. Its functions will comprise:

operating the entry gateway; assuring baseline quality; running the TEF; collecting and providing information; widening access and success for disadvantaged students; allocating grant funding; ensuring student protection; promoting the student interest; ensuring value for money for students and the taxpayer; and assuring financial sustainability, management and good governance (page 58).

The Office might contract out any or all of these functions, including to QAA (there is no reference to QAA's role of assuring quality and standards on behalf of the sector).³ Alongside the OfS, the Government wishes to create 'a single, transparent and light touch regulatory system' (page 60), where the degree of regulation will be inversely proportional to the amount of perceived risk. There are also proposals to enable the institutions that are constitutionally Higher Education Corporations (mainly the former polytechnics) to change their governance arrangements more easily.

Research

The Green Paper announces the Government's intention to reduce 'complexity and bureaucracy' in research funding whilst taking account of the conclusions of Sir Paul Nurse's review of the Research Councils when available. The dual funding system will be retained but could be delivered through 'an overarching body that brings together Research Council functions with management of institutional research funding for England' (page 71). The Government will explore whether are options to streamline and reduce burdens in the design of a future REF. These could include 'making greater use of metrics and other measures to "refresh" the REF results and capture emerging pockets of research excellence in between full peer review' (page 73).⁴

The Green Paper - Assessment

The 'core aims' of the Green Paper are:

To raise teaching standards, provide greater focus on graduate employability, widen participation in higher education, and open up the sector to new high-quality entrants. (page 7).

At the same time the 'regulatory burden' on the sector will be reduced. How far are these aims likely to be achieved? What other consequences can be expected?

Raising teaching standards

The Green Paper states (page 11):

To be able to make the best choices about where and what to study, individuals need access to robust, timely and objective information regarding the quality of teaching they are likely to experience and what this is likely to mean for their future employment.

It claims (page 31) that the aims of the TEF can be achieved through 'a simple, robust system'. But to link student choices or funding judgements to assessments of quality at institutional level requires the following conditions to be met:

- it must be possible to produce valid and reliable information about the relative quality of programmes and awards in a subject or field of practice at different institutions (and aggregate them to institutional level);

- this information must be available in a timely, accessible, economical and equitable fashion;
- the information must be related to the individual student's wants, needs, resources and circumstances;
- it must be interpreted in a rational, or at least semi-rational, manner by the student or those advising them;
- it must lead to action by providers to adjust price and/or quality.

To begin with, to be able to make robust judgments about the comparative quality of programs and awards at different institutions would require:

- the programmes to be reasonably comparable in aims, design, structure, content, learning outcomes, delivery, support, learning environment, resourcing, mission, ethos, etc.;
- the associated awards to involve comparable assessment approaches, methods, criteria, procedures, outcomes;
- the assessment judgments to be valid, reliable, consistent and fair;
- the students pursuing the programme, or interested in doing so, to have comparable starting attainments, aspirations, motivations, learning objectives, etc.

One has only to reflect on these points for a moment to see how unlikely it is that these conditions can be fulfilled in the complex, mass system that now exists in England, much of it in direct response to student preferences. In effect, it would require a common curriculum for every subject or combination of subjects on offer, with tests administered by system examiners, something that is virtually unimaginable even by the present Government.⁵

But even if these problems could be overcome, the other difficulties would remain:

- the information needs to be provided in advance, yet student education is a 'post-experience good' (Weimer and Vining, 1992), the quality of which cannot be established until after, often well after, the course concerned;
- in a mass system with a huge diversity of students, it is hard to see how the information can take proper account of individual students' backgrounds;⁶
- the information needs to be balanced, accurate and fair, but what incentives do institutions have to ensure this, against the need to attract students by whatever means they can (Watson, 2008);
- in accord with what we know from behavioural economics, students are no more 'rational' in the choices they make than other categories of consumer. Yet if they don't act rationally, it is not easy to see how institutions can make the appropriate responses;
- finally, all of this assumes that the student is merely a passive recipient of their education, yet it is a commonplace of the pedagogical literature that the student is not only a powerful constituent of their own learning but also of that of others ('co-production'). Even if all the other requirements could be met, it is very hard to see how any system of information can accommodate this dimension.

It follows that, rather than improving teaching quality by linking it to funding, the TEF is much more likely to absorb and divert institutional resources that should be being used for quality assurance into gaming the system. This would be a great pity, because there is plenty of evidence that the preference that some academics have for research does affect the

attention that they give their teaching, and, more generally, that institutions are not exploiting the potential synergies between staff research and scholarship and student learning. However, there is an obvious, and much more straightforward, solution, namely, to abandon research selectivity across most disciplines. This is something that is highly desirable in its own right in enabling us to make better use of the increasingly constrained resources being devoted to research.⁷ An alternative, if this is felt to be too radical, would be to include the effect on student learning in the impact section of the next REF. This would correct the extraordinary anomaly – at least to those unfamiliar with the quality of British higher education policymaking – that the recent REF looked at every kind of impact except for the one – on student learning – that provides the strongest – some would say, the only – justification for conducting research in universities in the first place!

Fortunately, it is possible to be somewhat more succinct in looking at the Green Paper's other aims.

Graduate employability

The Green Paper argues (at one and the same time) that there is a shortage of highly skilled job applicants in (especially) STEM subjects, and that too many graduates are in non-graduate jobs:

Higher education providers need to provide degrees with lasting value to their recipients. This will mean providers being open to involving employers and learned societies representing professions in curriculum design. It will also mean teaching students the transferrable [sic] work readiness skills that businesses need, including collaborative teamwork and the development of a positive work ethic, so that they can contribute more effectively to our efforts to boost the productivity of the UK economy. (page 11).

The TEF should be a 'good deal' for employers and the taxpayer:

The aim is to improve the teaching that students receive, which in turn should improve their productivity and help them secure better jobs and careers. It should enable employers to make more informed choices about the graduates they recruit, providing better understanding of the range of skills and knowledge they bring from their course, and deliver graduates who are more work ready following an active engagement in their studies. With higher returns, more graduates will be able to pay back more of their loans, reducing the amount that needs to be subsidised by the taxpayer in the longer term. This is on top of the benefits to taxpayers from having a stronger economy powered by a higher skilled workforce. (page 21).

However the same difficulties that affect information for students apply equally to information for employers. In any case, the implication of the statements in the Green Paper is that the responsibility for any failure to match the supply and quality of graduates to the needs of the economy lies with the universities. But how far should universities be attempting to take account of the needs of the economy, always assuming that anyone knows what these are? Is it really the job of the universities to produce 'work ready' graduates, whatever that means? And whose responsibility is it to ensure that graduates' skills are fully utilised? Isn't the real problem the fact that the deflationary, supply-side oriented macroeconomic policies followed by governments of all parties since the 1980s have provided too few incentives for companies to invest sufficiently in upgrading their employees' skills, as well as improving their efficiency (see Brown, Unpublished, for the full argument).

Widening participation

The same attempt to place the blame for historic failures onto the universities - as a means of diverting attention away from the Government's role? – can be seen in the Green Paper's discussion of widening participation and social mobility. There is indeed ample evidence of declining social mobility (for example, Bukodi et al., 2014). But it is clear from the evidence we have that whilst universities undoubtedly have a part to play in raising aspirations, the main obstacle to improving participation by under-represented groups is the relative scarcity of suitably qualified applicants; that the main cause of this is the very variable performance of the schools; that this reflects the segregation of British, and especially English, schools on socioeconomic lines; and that this in turn contributes to, and indeed reinforces, rising inequality (Brown, Submitted for review).

For all the rhetoric about being a One Nation Government, there is a whole series of current policies that will actually increase inequality:

- the planned further massive reductions in public expenditure will hit the public services on which the poorer and less advantaged members of society especially rely, the scale and quality of which have already been reduced in the last Parliament;
- the freezing of the top marginal rate of Income Tax will do nothing to reduce inequality whilst the freezing of the VAT rate means that the poorest 10 per cent of households will continue to pay a considerably higher share of their income in taxes than the wealthiest;
- the increase in the Inheritance Tax Threshold will increase still further the value of inherited wealth, as well as reducing the incentive to 'trade down' to help housing supply (cuts in the annual tax allowance for pension contributions for people with earnings of £150,000 or more could have been used to reduce the welfare cuts);
- the social security reforms announced, not least the cutbacks in tax credits, are bound to increase child poverty, as a recent Government assessment leaked to *The Guardian* (Butler and Malik, 2015) made clear;⁸
- the industrial relations reforms will further weaken the ability of the trades unions to act as a moderating force on inequality, including the lowering of wages that is almost certainly one of the main causes of our poor recent productivity record (there are no parallel constraints on the movement or withdrawal of capital by companies);
- the fragmentation of the school system will increase still further with additional academies and free schools, and there are no proposals to put the state and independent schools on the same footing as regards resourcing or esteem (Brown, submitted for review).

In *Anarchical Fallacies: Being an Examination of the Declarations of Rights Issued During the French Revolution* Jeremy Bentham (1843) coined the phrase 'nonsense on stilts' to describe the idea of natural rights. Surely, the Green Paper's attempt to blame the universities for differential participation in British higher education can be described as 'hypocrisy on stilts'?

New providers and entry and exit

As the Green Paper indicates, some steps were taken under the Coalition Government to facilitate the entry into the system of organisations other than institutions funded and

regulated through the funding councils, notably allowing smaller providers to obtain a university title, as well as encouraging private 'for profit' organisations to do so, hence we now have a number of private universities, some of them profit making. This was in spite of very clear evidence from America of what happens when the profit motive is introduced into the supply of higher education.

As well, no doubt, as lobbying by some major companies, the Green Paper proposals reflect the belief of the Government that (a) increased competition is the key to improving quality, efficiency and student satisfaction; (b) publicly funded universities and colleges still do not have enough competition; but (c) the market entry (and exit) barriers to new providers are still too high. An alternative view – based on what we know from research about what happens when market competition is introduced into higher education (Brown, 2011) - would be that (a) because of the difficulty (in fact, the impossibility) of producing 'robust, timely and objective' comparative information about quality (as would be expected in any conventional market), what you have in higher education is not resource competition as envisaged by the economists, but status competition as theorised by the sociologists (Hirsch, 1976), where brand substitutes for quality and what universities compete for is not students and income but reputation and status (as also, in their choice of institution, do many students and employers); (b) what is needed therefore is not greater competition for students and income, but stronger regulation to prevent the more prestigious (and better resourced) institutions exploiting their market power at the expense of less prestigious and poorer ones by, for example, charging more (as they do in the uncontrolled markets for postgraduate and overseas students), and thus exacting rents that because of the public subsidies are ultimately borne by the taxpayer.⁹

This leads naturally on to the question of how quality and standards will be protected in a situation where competition between different categories of institution is being intensified and extended, for the first time in the mainstream undergraduate market, to price.

Although one would never know it from the Green Paper, historically the main part in protecting quality and standards in British higher education has been played by universities' quality assurance processes, underpinned by the periodic system-wide reviews conducted by the QAA and its predecessors. These are based on the notion - and, for the most part, the reality - of the 'self-critical academic community', regulating quality through such processes as course approval and validation, external examining, and peer review. It is on these arrangements that our high international reputation for quality rests.

Whilst the Green Paper refers to academic freedom and autonomy, it is clear from the document as a whole, as well as a series of texts going back well before the 2011 White Paper¹⁰ and the wretched Browne report¹¹, that this Government like its predecessors believes that the real protection for quality lies in market competition, and not in the self-regulating processes of the academic community. This explains the equation of quality assurance with quality assessment (for example, on pages 23 and 59) and the paucity of references to QAA that was noted earlier.¹²

What all this means is that we are weakening the main quality safeguards we have, and which have generally served us well, without putting anything worthwhile in their place. By intensifying competition to include competition on price we are further reducing the ability of academic peer review to hold the line when, for example, institutional management puts pressure on examiners to vary standards by inflating grades or passing students who should have been failed because of the potential loss of income. Having begun to destroy the

universities' resource base directly through the intensification of immigration controls, the Government is now undermining our reputation for quality by displacing or downgrading the means through which we earned that reputation in the first place. This is all very sad.

Regulatory architecture

The Green Paper claims that the level of regulation will be reduced, at least for 'low risk' providers. Leaving aside the obvious dangers of such an approach (King, 2011), it is very hard to believe that universities will be putting less effort into regulation than they already are.

There is certainly an argument for some streamlining of external regulation, and especially in reducing the number of external agencies with which universities have to interact, and indeed there have been a number of reports calling for this, including one published by the Higher Education Policy Institute of which the writer was an author, which is not mentioned in the Green Paper (Brown and Bekhradnia, 2013). However, the degree of streamlining envisaged is limited: it essentially puts OFFA into HEFCE, which is where it should have been in the first place. Second, to the extent that OfS will still have a funding role, there is an obvious conflict between its role as a funding agency and its role of giving impartial ('arm's length') advice on quality. Most serious of all, however, is the fact that the new agency is once again to be accountable to Ministers when it is essential for the system's academic health to keep the Government out of quality and quality assurance (which is why the HEPI report proposed that as well as not having any funding responsibilities the new, single regulatory agency should report directly to Parliament and not through the Minister).

Conclusion

Hardly any of the proposals in the Green Paper are needed. Yet by intensifying marketisation they will further weaken the system, and make it even harder for the universities to discharge their central function of providing the best possible education for their students with the resources available¹³ against ever increasing international competition. This will damage not only the institutions and their students but also the wider public interests they serve. This in turn will weaken our ability to achieve the objectives of improving productivity and social cohesion that the Government professes to want. The Green Paper is a disaster not only for British higher education but for the British economy and British society. The universities should have nothing to do with it.

Notes

1 The Conservative Party's election manifesto contained a commitment to introduce 'a framework to recognise universities offering the highest quality teaching' (page 35). It is believed that this was a parting gift to the sector from the Coalition Higher Education Minister, David (now Lord) Willetts.

2 The use of the term 'regulated provider' implies that even now, not all providers of higher education in England will be covered by the new regulatory framework.

3 Under the Further and Higher Education Act 1992, the assessment of the quality of education is quite clearly separated from the arrangements made by each institution for maintaining academic standards. Whilst the Funding Council is under a duty to secure that provision is made for quality assessment, the Funding Councils can only make provision for the assessment of academic standards (in effect, quality assurance) if so directed by the

Secretary of State, and they must do so collectively. To date, no such direction has been given.

4 This was first discussed in the run-up to the 1993 White Paper on Science but was never included in the document. The complete or partial substitution of metrics for peer review has been much debated in considerations of research funding over many years. It is a debate that is more likely to be ended through exhaustion than through resolution.

5 Brazil had a common exam taken by all students for a while but eventually dropped it on grounds of effectiveness and value for money.

6 The first independent review of the NSS emphasised:

the need to take into account student profiles when making any comparisons using the ... data, as 'raw' figures do not take into account the characteristics of students, their courses and the institutions in which they study may produce at best misleading and at worst invalid measures of teaching (SurrIDGE, 2006: 132).

The same point has appeared in subsequent evaluations but, needless to say, this 'health warning' does not appear with NSS outcomes.

7 It has long been clear that the costs and detriments of the RAE/REF outweigh any remaining benefits (see the summary in Chapter 8 of *Everything for Sale?*). Sector-wide selectivity should be confined to subjects or areas of perceived weakness and/or where it is desired to expand research and/or where there is a serious risk of expensive duplication of resources. Where there is no such need, the quality of staff research can be monitored through routine quality assurance, as it is anyway in preparation for sector-wide exercises.

8 According to the *Guardian* report, the memorandum sent to the Work and Pensions Secretary two weeks before the election stated:

Around 40,000 more...children might, in the absence of any behaviour change, find themselves in poverty as a result of reducing the cap to £23,000. If these families respond to the cap by making behaviour change, for example moving into work, they are likely to see themselves and their children move out of relative poverty.

The same report quotes the Department for Work and Pensions as saying:

As the document itself makes clear, these figures do not take into account a key impact of the cap: that it incentivises people to move into work and improve their lives.

9 The cases of the American Ivy League colleges and the English private schools are both instructive. Both sets of institutions charge well above what is needed for a reasonable quality of education ('what the market will bear'), and they are able to do so in part because they receive subsidies from the general taxpayer even though they are mostly used by wealthy households.

10 BIS(2011) *Higher Education. Students at the Heart of the System*. (Cmnd. 8122). London: BIS.

11 Independent Review of Higher Education Funding and Student Finance (Browne Report) (2010) *Securing a Sustainable Future for Higher Education*. <http://webarchive.nationalarchives.gov.uk/+/hereview.independent.gov.uk/hereview> (accessed 11 July 2012).

12 It should perhaps have been said earlier that the Green Paper provides virtually no argumentation, and certainly no evidence, about the quality of teaching in English universities. However one issue on which it is (relatively) eloquent is grade inflation (pages 25-26). Yet it is clear that one of the main causes of grade inflation is greater institutional competition to attract students by inflating grades (Brown with Carasso, 2013, Chapter 8).

13 On 12th November the HEFCE CEO, Madeline Atkins, warned that current university finances are vulnerable to small changes in public funding or in student numbers, with a very clear risk that the sector could soon be in deficit (Goddard, 2015).

References

BIS (2015) *Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice*. (Cm 9141). London: BIS.

Brown, R. (Ed.) (2011) *Higher Education and the Market*. New York and London: Routledge.

Brown, R. (Submitted for review) Education and inequality.

Brown, R. (Unpublished) Macroeconomic Policy

Brown, R. and Bekhradnia, B. (2013) *The Future Regulation of Higher Education in England*. Oxford: HEPI.

Bukodi, E., Goldthorpe, J.H., Waller, L. and Kuha, J. (2014) The mobility problem in Britain: new findings from the analysis of birth cohort data, *British Journal of Sociology*, 65, 3, 1-25.

Butler, P. and Malik, S. (2015) Thousands plunged into poverty by benefit cap, *The Guardian*, 30 May, 1-2.

Friedman, M. (1962) *Capitalism and Freedom*. Chicago: University Press.

Goddard, A. (2015) Financial risks ahead: Funding council chief raises concerns, *Higher Education from Research Fortnight*, 13th November.

<https://www.researchprofessional.com/0/rr/he/agencies/hefce/2015/11/Financial-warning.html>. (accessed 15th November 2015).

Hirsch, F. (1976) *Social Limits to Growth* Cambridge Ma. Harvard University Press.

King, R. (2011) *The Risks of Risk-Based Regulation: The Regulatory Challenges of the Higher Education White Paper for England*. Oxford: HEPI.

Surridge, P. (2006) *The National Student Survey 2005: Findings – Main Report*. Bristol: HEFCE.

Watson, D. (2008) Universities behaving badly? *Higher Education Review*, 40, 3, 3-14.

Weimer, D.L. and Vining, A.R. (1992) *Policy Analysis: Concepts and Practice*. Englewood Cliffs, New Jersey: Prentice-Hall.