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How quality assurance codes change: beyond ‘bells and whistles’ and ‘code by catastrophe’?

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ABSTRACT

Quality assurance codes and guidelines for systems of higher education change frequently and sometimes rapidly and dramatically. More often changes are gradual and incremental. This paper examines types of change to these codes and guidelines and uses strategic management theory to outline three modes of development and change. An example of gradual change, sometimes referred to as ‘logical incrementalism’ or ‘adding bells and whistles’ is outlined from Oman. A contrasting example of discontinuous change known as ‘emergent strategy’ or ‘code by catastrophe’ is used from Australia. Elements of a third ‘co-participative’ model incorporating stakeholder and community input alongside technical knowledge are becoming more frequent. An ideal model is proposed drawing from the best aspects of logical incrementalism and co-participative development. This model can be applied to changes in codes, guidelines and standards in multiple systems and sectors.

KEYWORDS

Strategic management theory; higher education; quality assurance; logical incrementalism; emergent strategy; co-participative development; standards; guidelines; Oman; Australia

Introduction

The objective of this paper is to illuminate models of changes to quality assurance codes, using two contrasting examples. Codes change periodically, as does the higher education sector more broadly. Models of change are derived from strategic management theory, which considers strategies adopted by regulators and managers to optimise performance in changing contexts. The paper considers two main models of code development and change and one developing model. It uses examples to illustrate these models and considers the advantages and drawbacks of each. In this paper, the term ‘codes’ is designated to include guidelines and standards. The term ‘institution’ includes the national quality agency or regulator.

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Strategic management approach to educational code development

The origins of strategic management theory can be traced to the 1930s: it is a field of management theory that seeks to identify optimal strategies to improve performance in changing environments (Hill et al., 2014). Idenburg (1993) stated that the two central characteristics associated with strategic management are the *process*, which may be prescriptive or descriptive (specific or more general guidelines) and the *change*, which may be continuous or discontinuous.

These characteristics accurately reflect the organisational and governance structures in higher education and, consequently, strategic management theory may provide a suitable framework to examine strategic change management in this sector. For example, external quality assurance of the sector may provide guidelines for institutions and programmes that are either descriptive or standards that are prescriptive. Change may be continuous as in steady growth of student numbers, or discontinuous when affected by government regulations or political instability.

However, in seeking to understand how strategic change management, as an ontological model, can be applied to educational code development it is first necessary to describe the mechanisms by which codes are developed and amended. This process occurs by one, or a combination of three change-management mechanisms: logical incrementalism; emergent strategy; co-participative development. This paper will first describe these mechanisms.

Logical incrementalism: adding bells and whistles

Logical incrementalism is defined as a process of codification of existing practice and represents a pro-active, continuous (although gradual) change based on existing patterns and structures. Logical incrementalism can be thought of as a hegemonic system where the change-management processes and content are dominated by a technical class. This model is characterised by an environment where, 'The process develops in phases but each following phase builds on the previous stage and has its own internal logic' (Idenburg, 1993, p. 135). This *status quo* approach was summarised by Zimmerman and Martin (2001, p. 172) as occurring where 'there is little incentive to do anything different than standard practice. What has been provided in the past is assumed to have worked and therefore be provided again'. This model has been appreciated for the certainty and continuity that it provides organisational structures and remains the dominant strategic change-management model in the higher education sector.

Logical incrementalism in quality assurance codes is evident through multiple iterations of manuals, generally through periodic reviews. For example, the Oman Academic Accreditation Authority (OAAA), operating in a rapidly-developing system, produced its first general guidelines in 2008, followed by its first institutional manual and programme accreditation manuals in 2016 (OAAA, 2008, 2016a, 2016b). Similarly in Australia, the former Australian Universities Quality Agency

(AUQA), produced its first manual at its inauguration in 2001, heavily based on the system imported from New Zealand; this went through eight versions until 2011 (AUQA, 2011).

In these cases, guidelines became more prescriptive with experience of the questions and issues that arose in the practice of audit. A simple example in relation to Omani institutions with external partnership arrangements shows this trend. In the 2008 *Guide for Institutional Accreditation*, there are three sentences that guide these requirements.

Institutions with external academic partnership arrangements may implement quality assurance procedures jointly with the partner; nevertheless, responsibility for quality assurance remains with the Omani institution. Attention should be paid to the role of the academic partner, the methods used for evaluation, and the internal standards of the academic partner. Certification of quality by a partner institution is subject to scrutiny according to Oman's standards as specified in this publication. (OAAA, 2008, p. 105)

In the 2016 Institutional Standards Assessment Manual this simple outline had evolved into one of 55 criteria with eight indicators:

Criterion 1.4: Institutional Affiliations for Programs and Quality Assurance

The HEI's academic affiliation agreements are clearly defined, effectively implemented and well-managed and these support the maintenance of academic standards, enhance quality and contribute to the HEI's external engagement.

The eight indicators cover Ministry approval, quality assurance arrangements, the effective discharge of responsibilities, alignment with the Omani and the partner national frameworks, the issuance of academic awards, the award certificates, adaptation to the Omani context and regular review (OAAA, 2016a, p. 32).

The OAAA approach represents an example of the optimum application of the incrementalism model. As Idenburg (1993) identified, logical incrementalism is best applied in an environment characterised by proactive and planned change management. This allows each new change to be considered within the broader organisational context, thus ensuring that each amendment retains strong goal and process orientation. This then provides the basis for ongoing incremental change that remains consistent with the broader strategic and operation goals of the organisation.

Alternatively, the logical incrementalist approach has limitations when used in an *ad hoc* way or where changes continue to be made in the hope of improving an already functional system, or to use a common aphorism, letting 'perfect be the enemy of good' or adding so many 'bells and whistles' that the original structure and purpose of the system is obscured or hindered. Such changes can lead to sub-optimal organisational structures as new changes are incrementally added to the existing structure in isolation and without consideration of the totality of the changes (Hadjisophocleous & Benichou, 1999). This sub-optimal approach has the potential to create an organisational environment characterised by dis-organised administration process and technical content. Put simply, this reflects

an organisational environment where 'change is made for the sake of change' or to demonstrate continuous improvement. In such an environment bureaucratic regulation can become stultifying, which may cause catastrophic failure of process, leading to calls for change from outside the organisation. This introduces the second tradition change-management process, emergent strategy or colloquially 'code by catastrophe'.

Emergent strategy: code by catastrophe

Emergent strategy (Idenburg, 1993) is described as an intermittent process of reactive and discontinuous change based upon specific events where

it is not possible to develop a perspective of the future and formulate explicit objectives in an unpredictable environment: instead, it is necessary to react in a flexible, opportunistic and accidental manner to new, unpredictable developments, and 'muddle through'. (Idenburg, 1993, p. 136)

Importantly, the organisational structure that supports an emergent strategy response is the same as the traditional logical incrementalism approach. However, it is the type of event that identifies the need for change that strongly influences the implementation selection of a 'code by catastrophe' response as the change-management model. Unlike logical incrementalism, which is based on pro active and planned change, the type of event that precipitates 'code by catastrophe' is usually a single catastrophic event or a series of events of a similar nature that have occurred over a relatively short time frame. This leads to a climate where the calls for change are driven from a political rather than from a technical perspective and may lack an understanding of the organisation's structures and processes. However, although not intimately involved in the development of the new codes, the actual change is still required to be implemented and managed by the affected organisation. This can produce sub-optimal outcomes as the organisation is required to implement changes that it was not involved in developing and that may not align with the existing codes and standards.

Emergent strategy as applied to strategic change management is reactive and consequently may lack goal and process orientation. In these cases, emergent strategy could be described as containing the worst elements of the *ad hoc* application of logical incrementalism without any of the benefits that the structured logical incrementalism change management model provides.

An example of emergent strategy is Australia's shift from AUQA to its successor organisation, the Tertiary Education Quality and Standards Agency (TEQSA) that occurred in 2011, essentially as a result of a political process of a review of higher education, the 'Bradley Review', which called for an expansion of the sector to the 'demand-driven system' and a stronger external quality assurance approach (Bradley et al., 2008). The AUQA model was one of fitness-for-purpose with auditing of an institution against its own objectives:

AUQA uses as its primary starting point for audit each organisation's own objectives and does not impose an externally prescribed set of standards upon auditees. AUQA considers the extent to which institutions are meeting these objectives, and how institutions monitor and improve their performance. AUQA also takes into account the requirements of relevant external reference points established to guide institutions in setting their objectives. This approach recognises the auditee's autonomy in setting its objectives and in implementing processes to achieve them within some overarching parameters, such as criteria set by agreed national or sectoral guidelines. (AUQA, 2011, pp. 4–5)

This quality audit approach, while referencing standards, specifically states that it 'does not impose an externally prescribed set of standards upon auditees'. By contrast, the model introduced by TEQSA establishes TEQSA as a regulator rather than an external quality assurance body, with powers to register institutions and with a regulatory approach that is 'standards and risk-based'. This approach is made clear on the TEQSA website under the heading 'regulatory approach':

The role of TEQSA is to safeguard the interests of all current and future students studying within Australia's higher education system. It does this by regulating and assuring the quality of Australia's higher education providers. TEQSA is responsible for the registration and re-registration of providers, and the accreditation and re-accreditation of courses.

TEQSA's regulatory approach is standards and risk-based. It is guided by three regulatory principles—regulatory necessity, reflecting risk and proportionate regulation, when exercising its powers. (TEQSA, 2016)

The shift from a fitness-for-purpose quality audit and enhancement model to a standards and risk-based regulatory model was severe, disruptive and contested. Many of the features of AUQA such as its site visits with external expert panels, its best practice database and its annual conferences and awards were abandoned. This dramatic change was viewed with great interest from agencies in other jurisdictions, many of which had adopted a version of the AUQA model within their own countries. It is arguable that the risk and standards-based approach constituted a radical innovation in external quality assurance, which was initially disruptive in the Australian system.

In this example, the change followed a classic emergent strategy pattern, driven by external political influence. However, it was also proactive in finding a different model for external quality assurance as an integral part of the emergent strategy response. As is a common factor with this form of change management, the original emergent strategy response was initially disruptive. However, following the substantive initial change the emergent-strategy model has reverted to periodic amendments based upon a logical incrementalist framework. In this way, over time the initial change gradually becomes established or sedimentised as the new 'normal' benchmark from which future incremental changes are made. This *status quo* approach will continue until another emergent strategy change is made in response to events to realign the organisational framework.

This reversion to an incrementalist approach is seen, for example, in the revision of the Higher Education Standards Framework from 2011, with the new framework implemented from January 2017. These incremental changes, unlike the Omani example discussed earlier, considerably simplified the existing standards and removed duplication. They were also the subject of extensive stakeholder consultation.

Idenburg (1993, p. 136) described the generally reactive nature of the emergent strategy model as having 'weak goal and process orientation'. This can lead to a situation that 'leaves the door open for all kinds of irrational mechanisms'. While the move to TEQSA was not entirely reactive, the new role of regulator did lead to some apparently irrational mechanisms, notably two ill-fated instances where TEQSA tried to impose what were perceived as unreasonable bureaucratic demands on the sector. One of these was in relation to a very cumbersome survey on English language proficiency and the other a 42-page survey on all partnership arrangements, defined so tightly as to include (for example) every single placement provider, which for a large institution would run into many hundreds or even thousands across multiple disciplines and locations. These examples of heavy-handed regulation led to changes in both TEQSA's leadership and *modus operandi*.

Co-participative strategic change management: the third model

Logical incrementalism and emergent strategy can both be described as applying a linear approach to strategic change management in higher education. The field of innovation management research known as 'social shaping of technology' describes this form of linear development as 'innovation involving a one-way flow of information, ideas and solutions from basic science, through research and development (R&D), to production and the diffusion of stable artefacts through the market to consumers' (Williams & Edge, 1996, p. 867). Significantly, Williams and Edge considered that linear development had major limitations for effective technological development as effective change management should recognise societal as well as technological inputs. Or, to further quote Williams and Edge (1996, p. 865) 'the design and implementation of technology are patterned by a range of social and economic factors as well as "narrowly technical considerations"'.

Thus, the recognition of a social dimension to strategic change management is a critical factor in the evolution of organisational structures where the identification of societal needs, a core function of universities, acts as a guide to understanding and interpreting the broader strategic intent of the organisation. The lesson from social shaping of technology research is that in order to create an organisational structure that has both community and market acceptance, societal as well as technological needs must be recognised. In the AUQA to TEQSA shift outlined above, there was initially insufficient consideration given to the social and stakeholder inputs. This omission is perhaps not surprising as overt recognition of societal concerns has not traditionally been a characteristic of the logical incrementalist or

emergent strategy change-management models. The organisational basis of the new model originates from the affected community: its distinguishing feature is that societal, as well as purely technical matters, are reflected in the developmental process and code content. This fundamental shift in strategic change management reflects a general move to greater community involvement in decision-making processes. The co-participative development recognises the value of general societal concerns as well as technical knowledge (O'Brien, 2016).

This form of strategic change management is defined by Lockwood *et al.* (2006) as participatory planning, which reflects the principles of equality and participative democracy. They described participatory planning as occurring where 'the objectives and outcomes of planning should reflect a synthesis of the interests of the stakeholders and not relate to the interests of a single individual or subgroup' (Lockwood *et al.*, 2006, p. 298). Participative planning places the individual(s) at the centre of the strategic change-management processes, a model where individuals will not simply be the passive recipients of executive fiat but rather will be active and engaged parties to the change-management processes (Lockwood *et al.*, 2006). This view reflects both Williams and Edge's (1996) and Jasanoff's (2004) observations that technological and societal development is a result of collaboration. Or, as described by Jasanoff (2004, p. 33) where 'science and society, in a word, are *co-produced*, each underwriting the other's existence'.

The application of the participative process was observed in an earlier paper considering how risk perception informed policy development (Jasanoff, 1998). He described constructivist risk perception as arising from societal concerns grounded in personal experiences and knowledge rather than arising from the technical basis of the traditional strategic change-management models. Building on and adapting Lockwood *et al.* (2006) and Jasanoff's (1998) observations, this third category of organisational strategic change-management is described as co-participative change management. Jasanoff asserted the benefit of this model as the production of authoritative knowledge 'produced through interaction among multiple stakeholders, each interpreting the available information in the light of its own interests and experience' (Jasanoff, 1998, p. 94).

The co-participative model develops in circumstances where societal expectations or concerns evolve separately from the technological or expert matters that have been controlled by the traditional strategic change-management models. Under the traditional strategic change-management framework, community based stakeholder opinion and concerns have to a large extent been inadequately represented in the decision-making process. This created a situation where, although societal expectations evolved, satisfactory code responses were unable to be developed under the existing change-management paradigms.

As a community informed participative process, the co-participative change-management framework arises from a broader societal perspective rather than a narrower authoritative knowledge base. This strategic change-management model supports Jasanoff's (1998) observation that in some circumstances policy

development that invites layperson perceptions and recognises their concerns as equally valid as those of technical experts can be an effective code development model. In higher education external quality assurance it is hard to see a genuine co-participative model. Generally, stakeholder and community participation occur in a constrained process of response to a technical paper produced by an expert body. The redevelopment of the Australia Higher Education Standards Framework that was implemented in 2017 came close to a genuine model of consultation. The Higher Education Standards Panel undertook extensive consultation on the new Higher Education Standards Framework with 15 communiqués, three calls for input and multiple presentations and discussions (Department of Education and Training, 2016). Nonetheless, it cannot be said to be a genuine co-participative change-management model, as it was driven and directed from within the Department of Education.

Conclusion

The identification and description of the three strategic change-management models is an important element in understanding organisational structure and outcomes as applied to the higher education sector. Understanding each of the change-management options is a necessary first step in developing optimal outcomes.

Logical incrementalism is viewed as having strong process orientation (how the change is developed) and goal orientation (what the change is developed for) and thus would represent the preferred model for optimum strategic change management. However, where logical incremental changes are introduced in *ad hoc* fashion or when seeking to make continued perceived improvements to already functional systems, sub-optimal outcomes may result. In these circumstances, where changes are made 'for the sake of change', logical incrementalism is similar to emergent strategy in its weak process and goal orientation and as such becomes a sub-optimal model for strategic change-management (Idenburg, 1993). Thus, an effective change-management model would avoid both *ad hoc* logical incrementalism and emergent strategy.

Co-participative change management represents a third way that provides an opportunity and mechanism for the participation of lay persons within decision-making and governance processes. Indeed, many organisations are moving towards formalising community engagement in their change-management processes. However, as with many organisations, the higher education sector employs a complex bureaucracy underpinned by specific process and jargon. In this environment it is probable that change-management based entirely on layperson input through the co-participative model would lead to sub-optimal outcomes.

Following a critical examination of the three dominant change-management models presented in this paper, the authors propose that an effective change-management system for the higher education sector would involve a hybrid model

based on elements of logical incrementalism and co-participative development. This model would employ the positive aspects of Jasanoff's (1998) co-participative model that engages multiple stakeholders with different perspectives but would marry that with the technical expertise to make logical and useful incremental changes. Such a model would avoid both externally-imposed changes by catastrophe and stultifying incremental changes where the bells and whistles obscure the purpose of the code.

Disclosure statement

No potential conflict of interest was reported by the authors.

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