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Teacher Education Quality Assurance Policy Making in India:
the Construction of the Teacher Education Accreditation Policy

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Declaration

I hereby declare that this thesis has not been and will not be submitted in whole or in part to another University for the award of any other degree.

Summary

In 2002, the National Council for Teacher Education (NCTE) in India, which is the national regulatory body for teacher education, and the National Assessment and Accreditation Council (NAAC), which is the national quality assurance agency for higher education, signed a Memorandum of Understanding (MoU) to develop and begin a process of assessment and accreditation of degree-level teacher education programmes offered by teacher education providers. This process was intended to lead to improvements in the quality of teacher education provision and consequently better teachers; which was something that had not been achieved effectively by the existing regulatory mechanisms. This initiative reflects a global popularity of external quality assurance (EQA) in higher education that had existed since the 1990s in the context of heightened concern about the quality of expanding higher education and increasing accountability demands.

This thesis examines the discursive construction of the MoU in the above context and focuses on the process of formulation and the content of policy texts. The study understands policy as a social process and seeks to illuminate the context, complexity, and influences that framed the policy. It is a qualitative case study, drawing on analysis of interviews with policy-maker and policy documents. This approach was selected due to its ability to grasp the intricacies of a specific phenomenon.

The findings of the study suggest that the policy of teacher education accreditation in India may be understood as a process in which adoption of a global education policy was led by national actors as a form of domestic policy borrowing. The analysis illustrates how national policy-making was influenced by various factors in a complex and nuanced manner, including the increasing international and national popularity of accreditation, neoliberal governance reform, the weakening of central government control to mediate policy, the proliferation of agencies, and the overlapping mandates and concerns of the policy actors of the time. The study argues that observed changes in national policy-making indicate that the decision-making and control in policy formulation were diffused in the overlapping lines of influence, which may have had serious social justice implications for citizens who have limited means for political contestation.

Although globalisation has brought significant changes in education policy-making, resulting in increasing cross-national policy borrowing and global policy convergence,

there is insufficient empirical research on its effects in diverse national contexts. This research contributes to the understanding of national policy-making in such globalising context through providing a detailed account of adoption of a globally popular policy of teacher education accreditation in India.

The study makes recommendations for policymakers, which include the examination of the national policy-making space in an era of globalisation and its impact on the democratic accountability in policy formulation. The study also proposes further research, including how the national teacher education policy space is influenced by overlapping lines of influence, especially in the Global South and about the ways in which teacher education accreditation policies are mediated in diverse national contexts.

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List of abbreviations

A&A	Assessment and Accreditation
AITSL	Australian Institute for Teaching and School Leadership
B.Ed.	Bachelor of Education
CAEP	Council for the Accreditation of Educator Preparation
CAS	Critical Analytical Study
CDA	Critical Discourse Analysis
COL	Commonwealth of Learning
EdD	International Doctor of Education
D.El.Ed.	Diploma in Elementary Education
DIET	District Institutes of Education and Training
EQA	External Quality Assurance
ESG	European Standards and Guidelines
EU	European Union
GEP	Global Education Policies
GPR	Gross Enrolment Ratio
HE	Higher Education
HEI	Higher Education Institution
ICT	Information Communication Technology
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IO	International Organisations
IRA	Independent Regulatory Agency
ITE	Initial Teacher Education
MHRD	Ministry of Human Resource Development
MLG	Multi-Level Governance
MOOC	Massive Open Online Courses
MoU	Memorandum of Understanding
NAAC	National Assessment and Accreditation Council
NCF	National Curriculum Framework
NCFTE	National Curriculum Framework for Teacher Education
NCTE	National Council for Teacher Education
NOC	Non-Objection Certificate
NPE	National Policy on Education
NPM	New Public Management

OECD	Organisation for Economic Co-operation and Development
PI	Performance Indicator
QA	Quality Assurance
QCI	Quality Council of India
QM	Quality Management
RMSA	Rashtriya Madhyamik Shiksha Abhiyan
RTE Act	Right of Children to Free and Compulsory Education Act, 2009
SAR	Self-appraisal Report
SQ	Sub Questions
SSA	Sarva Shiksha Abhiyan
S/UT	States and Union Territories
TE	Teacher Education
TEI	Teacher Education Institution
TQM	Total Quality Management
UGC	University Grants Commission
UNESCO	United Nations Educational, Scientific and Cultural Organization

Chapter 1 - Introduction

1.1   Introduction

This research thesis is a case study of education policy-making regarding the accreditation of teacher education (TE) programmes in India. It seeks to understand how national education policy is constructed in a globalised policy-making space. It attempts to capture intricacies of policy-making and pays particular attention to the influences of global policy discourses and specificities of the national context. This chapter introduces the study by presenting the background (1.2), the rationale of the study (1.3), research aims, questions and methodological overview (1.4), and the structure of the thesis (1.5).

1.2   Background

Globalisation has brought significant changes in education policy-making in diverse national contexts, resulting in the increasing cross-national policy transfer and global policy convergence (Rizvi and Lingard, 2009; Verger et al., 2018). One of the education policies that has gained global popularity and convergence is External Quality Assurance (EQA) policies in higher education (HE). Since the 1990s many countries have established EQA agencies for HE, particularly in the form of accreditation (Hernes and Martin, 2008; Kis, 2005; Lao, 2015). For example, the worldwide association of EQA agencies, the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) has more than 300 members, the majority of which are EQA agencies (INQAAHE, 2020). Striking similarities can be found around the world regarding the methods of EQA systems, even when goals and contexts may differ (Harvey and Williams, 2010).

A large number of policy papers from international organisations (IO) also refer to the importance of EQA of TE providers and programmes (Eurydice, 2006; ILO, 2012; ILO and UNESCO, 2012; Kanwar and Umar, 2013; OECD, 2005; Sanyal, 2013; UNESCO, 2019a). Given that effective teachers are regarded as the most significant factor open to policy influence to increase student learning achievement (Eide et al., 2004; Santiago, 2002; Schacter & Thum, 2004), it is not surprising that many countries are stressing the development of effective mechanisms to ensure the quality of teachers (Ingvarson et al., 2013).

India is no exception to this growing trend towards EQA in HE and TE. In 1994, the National Assessment and Accreditation Council (NAAC), the national EQA agency for

HE, was established in India. In 2002, the National Council for Teacher Education (NCTE), the national regulatory body for TE, and the NAAC signed a Memorandum of Understanding (MoU) to start the assessment and accreditation of degree-level TE programmes (hereafter referred to as the NCTE-NAAC accreditation policy). It was hoped that this would lead to improvements in quality to reach higher standards; something that had not been achieved effectively by the existing regulatory mechanisms (NCTE, 2009; Stella, 2002). This thesis examines the ways in which the construction of the NCTE-NAAC accreditation policy was inflected by global policies and ideas as well as the local contexts. My research interest is to highlight what frames policy construction through analysing policy discourses and to offer a plausible account of national policy-making in a globalised era.

1.3   Rationale of the study

My interest as a researcher in the EQA can be traced back to 2008 when I was managing a UNESCO project for improving TE in Pakistan, which included supporting the establishment of an accreditation agency for TE, the National Accreditation Council for Teacher Education Pakistan. We started from scratch – developed a document describing accreditation procedures, set criteria to assess TE programmes, created benchmarks to determine acceptable levels, developed a manual for peer review, and studied the legal framework to attach possible consequences to the results of accreditation. As a project manager, I was involved in the entire processes. A number of accreditation systems in other countries including the one in India were studied to learn from, and some international EQA experts including one from the NAAC in India were invited as resource persons. The project was considered highly successful by the time it ended. The popularity of the initiative among the policy-makers and senior government officials was evident.

When I joined the International Doctor of Education (EdD) Programme with this background in 2012, my research interest was to study the effects of the TE accreditation system to understand if and how it could be a catalyst for improvement. However, in the process of doing a Critical Analytical Study (CAS) for my EdD, my interest progressively shifted from understanding the effects of the accreditation system to the reasons for adopting one. While doing CAS, I was surprised to find the impact of EQA processes had not been well studied and the theoretical base of EQA was considered weak (Hanaya, 2014). I began to question why EQA in HE is so widespread globally and why so many IOs are promoting it despite the weak evidence. This also raised my curiosity to understand policy-making in the era of globalisation.

Despite the global convergence of education policies, the literature does not provide sufficient empirical research on its effects and re-contextualisation in local places (Rizvi and Lingard, 2009; Verger et al., 2018). Thus, the need for more empirical study is not specific to EQA policy but is generally an important issue for policies that are adopted in many parts of the globe. However, empirical study of EQA in the Global South has particular importance, given the concern over cross-national transferability especially in less developed countries where the context is significantly different (Bazargan, 2007; Billing and Thomas, 2000; Bordia, 2001; Houston and Maniku, 2005; Jarvis, 2014). The empirical studies on EQA are still limited, especially from the Global South, and much of the available ones are on implementation at particular institutions or programmes (Cochran-Smith et al., 2016; Hanaya, 2014).

In this context, I believe that an empirical study examining EQA policy-making in the Global South by interrogating the influence of globalisation is of high relevance and critical importance for contemporary education research. The reason I chose India, not Pakistan, as the context for this research needs explanation. Firstly, as the core interest of this research is on national policy-making in the globalised era, the case in India was preferable because starting the TE specific accreditation was a domestic initiative in India, while the IOs played significant roles in the case of Pakistan. Secondly, I was deeply involved in the policy-making process in Pakistan, which would have brought particular difficulties to the research process.

This case study aims to add knowledge by providing a plausible account of education policy-making under the influence of globalisation and in relation to the national context from which the policy has emerged. As a case of policy-making, I believe EQA is a suitable policy to investigate for its global popularity, the limited empirical research, and the concern over transferability. I also hope that conducting this research provides me with an opportunity to reflect on my professional practice in international development, where development workers often act as a "broker" of new initiatives which originated in the Global North.

1.4   Research aims and questions and methodological overview

The following research question guides the study:

> How is the policy of accreditation of teacher education programmes in India discursively constructed?

I address this overarching question by answering the following two sub-questions (SQ). They are framed to examine the policy-making from different perspectives. SQ1 is:

> SQ1 - What was the agenda setting and policy text production processes of the policy of the accreditation of teacher education programmes in India?

SQ1 seeks to examine the formulation of the NCTE-NAAC accreditation policy based on the accounts of those who were involved. It includes investigation of the initiation of the policy discussion and policy text production processes, paying attention to the needs and issues of the actors and the national context. SQ2 is framed as follows:

> SQ2 - What are the discourses embedded in the policy of accreditation of teacher education programmes in India?

SQ2 analyses the documents of the NCTE and the NAAC to understand their visions of the accreditation system. It also examines alignment and discrepancies between their visions and also compares them to the global model identified in the literature review. While SQ1 focuses on the formulation of the policy, SQ2 analyses the content of the policy. Together, these questions answer the overarching research question on the discursive construction of the policy. Further explanation of the research question is in the methodology chapter.

This is a qualitative case study of policy-making using a critical constructivist approach. The case of this study is the policy-making that resulted in the policy of accreditation of TE programmes in India. Documents and interviews are principal sources of data, and critical discourse analysis is employed for analysis. My theoretical approach is located within critical and sociological tradition, particularly informed by the work of 'policy as discourse' (Bacchi, 1999; Cochran-Smith et al., 2013). Following this, I perceive policy to be a social process and attempt to illuminate the context, complexity, influence and process that framed the policy in certain ways. By examining discourses in the construction of the policy, I aim to unpack what is taken for granted and provide an account of policy-making in India in the globalised policy-making space.

1.5   Overview of the thesis

This study is organised into eight chapters. *Chapter 2* outlines the Indian national context to contextualise the research. It attempts to illustrate the status of the HE and TE in 2002 when the NCTE-NAAC accreditation policy was formulated. *Chapter 3* reviews several bodies of literature that inform this research and presents the theoretical framework for the study. *Chapter 4* overviews the methodology of this study. *Chapter 5* and *Chapter 6* analyse the findings from the research as they relate to SQ1 and SQ 2 respectively. *Chapter 7* synthesises and theorises the findings from the two finding chapters. *Chapter*

8 concludes the study with a summary of findings, recommendations for future research, and contribution to the field of study.

Chapter 2 - Indian Country Context

2.1   Introduction

This chapter describes the context surrounding the NCTE-NAAC accreditation policy. Understanding the country context is essential for this study to investigate its influence on the policy. The chapter first reviews the socio-economic situation (2.2), then the school education and higher education (HE) (2.3), followed by teacher education (TE) (2.4). The status of HE is reviewed since the NCTE-NAAC accreditation policy concerns the accreditation of degree-level TE programmes, which is a part of HE. Throughout this chapter, attempts are made to illuminate the status at the time of the introduction of the NCTE-NAAC accreditation policy in 2002.

2.2   Socio economic situation of India

With an estimated population of more than 1.3 billion, India is the world's largest democracy. The Constitution of India establishes a federal structure to the Indian government, declaring it to be a 'Union of States'. India comprises 28 states and 8 union territories (S/UT) (National Informatics Centre, 2020). The Constitution specifies the distribution of legislative, administrative and executive powers between the central and state governments[1] (Government of India, 1978).

Indian society is fragmented and marked by diversities of linguistic, religious, ethnic and caste groups, which are often interrelated. There are also immense urban-rural and north-south differences, and gender distinctions (Tenhunen and Säävälä, 2012). These sociocultural diversities have important implications for policy-making and policy adoption by different population groups in India (Padmanathan, 2019). While acknowledging its high importance, further historical and sociocultural information above this is not provided, primarily as they do not significantly seem to be factors in the making of the teacher education accreditation policy which is the focus of the study, as explained in the finding chapters.

A brief contextualisation of the economic structure in India is provided. Over the past decades, India's integration into the global economy has been accompanied by rapid economic growth. India embarked on a process of economic reform in 1991 in the wake

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[1] To differentiate 'state' as nation state and state governments in India, the latter is specified as state governments or states (sub-national level) when it is not clear from the context.

of a severe balance-of-payment crisis. India made some initial steps in the 1980s towards the reform, but it was only in 1991 that the government signalled a systemic shift to a neoliberal economy with greater reliance on market forces including privatisation, foreign investment and the restructuring the role of government. The crisis was resolved fairly rapidly in the fiscal years 1991–92 and 1992–93 and India became one of the fastest growing developing countries during the rest of the decade (Ahluwalia, 2002; Joshi and Sanyal, 2004). The growth was, however, accompanied by a significant rise in income disparity caused by the financial liberalisation (Ang, 2010). The paradigm shift in India's economic policy also brought changes in policies of various sectors including education (Ahluwalia, 2002).

2.3   Overview of education in India

This section first introduces education governance and policy (2.3.1), followed by an overview of school education (2.3.2) and higher education (2.3.3).

2.3.1   Education governance and policy

The governance in India is federal in character. Education was the responsibility of the state governments, but the forty-second amendment of the Constitution of India in 1976 put education on the concurrent list, i.e. the central and state governments have joint responsibility for education and both can make laws related to education (Government of India, 1978; Mehendale and Mukhopadhyay, 2019). In case of any dispute between the central and state governments, legislation framed by the central government has overriding authority. The Ministry of Human Resource Development (MHRD) or Ministry of Education (as renamed from MHRD in 2020) of the central government has the principal responsibility for education (IBE, 2011). The responsibilities of the central government include educational planning and policy setting for maintaining standards and the national integrative character of the education system (Stella, 2002). Since the economic liberalisation in the 1990s, the central government assumed greater role and power in legislating on education, formulating new policies, launching new flagship programmes, and allocating funds to state governments for implementation of the programmes (Mehendale and Mukhopadhyay, 2019). Furthermore, the Indian Constitution provides the structure for decentralised governance which includes the role of the local authorities in providing school education, though the implementation varies across states. Overall, the central and state levels play a key role in policy-making, curriculum formulation, and examination, while local level bodies are included as a key actor in implementation (Mehendale and Mukhopadhyay, 2019).

Since independence in 1947, the formulation and revision of the National Policy on Education has taken place three times. The National Policy on Education (NPE) was first framed in 1968 and then in 1986, which was later modified in 1992 (NPE 1986/92). Recently, the new National Education Policy 2020 (NEP 2020) was approved by the Union Cabinet in July 2020 after a broad-based rigorous consultative process. Substantial reform in TE is envisioned in the NEP 2020, which is discussed later in this chapter. There is no separate comprehensive teacher policy in India.

2.3.2 School education

India has a large and complex education system, with over 1.5 million schools, over 8.7 million primary and secondary teachers, and more than 260 million enrolments (British Council, 2019). Since the colonial period, the Indian school system has been a diversified system and school structure varied depending on the S/UTs. The NPE 1886/92 aimed to move towards the standardised *10+2 structure*: an elementary system comprising five years of primary education and three years of upper primary, followed by two years of secondary (or high school); plus two years higher secondary (Government of India, 1992; IBE, 2011). However, the NEP 2020 proposes restructuring into *the 5+3+3+4 structure*: five years of *the Foundational Stage* - three years of pre-primary school and Grades 1, 2: three years of *the Preparatory (or Latter Primary) Stage* - Grades 3, 4, 5; three years of *the Middle (or Upper Primary) Stage* - Grades 6, 7, 8; and four years of *the High (or Secondary) Stage* - Grades 9, 10, 11, 12 (Government of India, 2020). The change is summarised in the table below.

Table 1: Structure of school education

Grade	NPE 1986/92	NEP 2020
12	Higher secondary	High stage
11		
10	Secondary	
9		
8	Upper primary	Middle stage
7		
6		
5	Primary	Preparatory stage
4		
3		
2		Foundational stage
1		
	Pre-primary	

Source: (Government of India, 2020, 1992)

It is widely agreed that India has made significant progress in education in recent years, particularly in terms of access (British Council, 2019). The Gross Enrolment Ratio of different school levels is shown in Figure 1. All the school levels show continuous improvement in the past decades. The number of out-of-school-children of primary school age is shown in Figure 2, which also shows an impressive reduction.
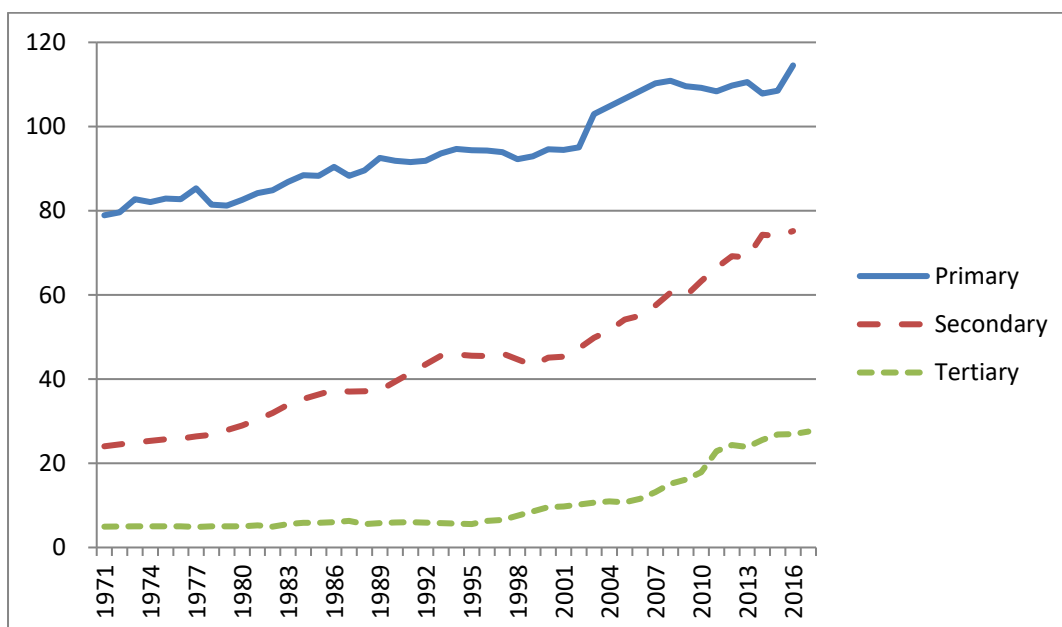
Figure 1: Gross enrolment ratio for different levels in India

Source: (UIS, 2020)
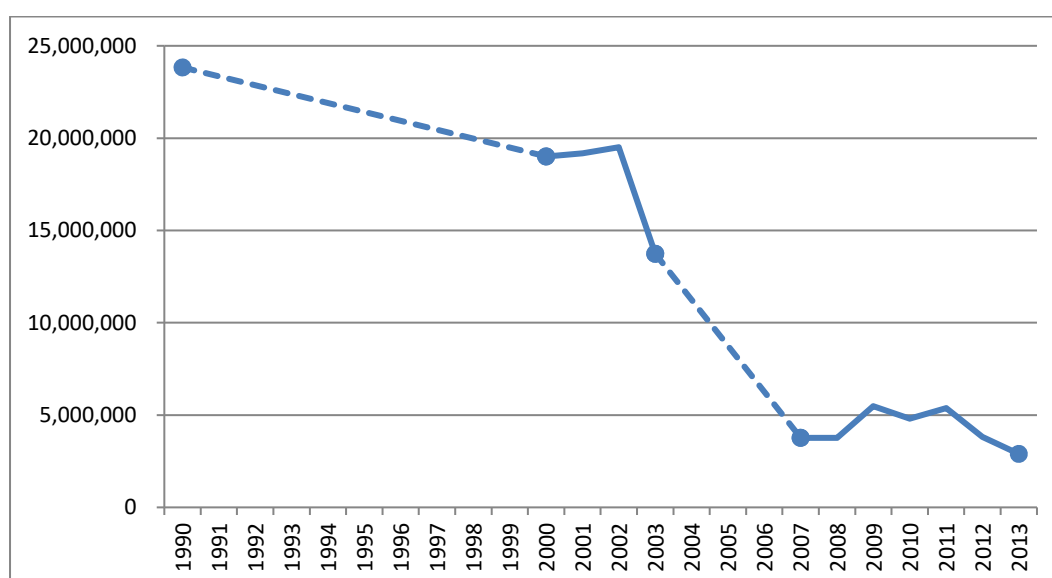
Figure 2: Number of out-of-school children of primary school age

Source: (UIS, 2020)

Since the economic liberalisation in the 1990s, the central government has launched large-scale programmes and has established constitutional and legal underpinnings for achieving universal elementary education (Mehendale and Mukhopadhyay, 2019). The District Primary Education Programme was started as a part of the structural adjustment program in 1994 after the economic crisis in 1991 (Kumar et al., 2001). The government of India's flagship programme for universal access and retention in elementary education, *Sarva Shiksha Abhiyan* (SSA), was operational since 2000 (MHRD, 2018). The Constitution (Eighty-sixth Amendment) Act, 2002, which inserted Article 21-A into the Constitution of India, envisages free and compulsory education for all children from six to fourteen as a fundamental right. The Right of Children to Free and Compulsory Education Act, 2009 (RTE Act) which came into force in April 2010, entitles every child of six to fourteen to the right to free and compulsory education in a neighbourhood school till the completion of elementary education (Government of India, 2020). The national project to enhance access to secondary education, *Rashtriya Madhyamik Shiksha Abhiyan* (RMSA), was launched in 2009 (Department of School Education & Literacy, 2018). In 2018, the government launched a new national program, *Samagra Shiksha Abhiyan,* by combining SSA, RMSA and the program for TE, as an overarching programme for the school education from pre-school to class 12, with the broader goal of improving school effectiveness measured in terms of equal opportunities for schooling and equitable learning outcomes (MHRD, 2019). These national initiatives in the last two decades have contributed to significant improvement in access to education in India.

The economic liberalisation in India also influenced discourses in education. Mukhopadhyay and Sarangapani (2018) argue that there has been a new discursive regime of educational ideas in India in the last decades that pays increased attention to the concepts of 'quality as measurable outcome' and 'accountability'. This seems to reflect the global neoliberal framing of education, discussed in Chapter 3. Batra (2014, p. S7) similarly describes the same strand of policy discourse in India as 'the neo-liberal frame of standardisation, teacher accountability and learning outcomes that regards education as an enterprise of efficient delivery'. This discourse has led to a preference for the private sector, which resulted in the market-based reforms in education and the expansion of the private providers particularly in the 2000s (Batra, 2014; Mehendale and Mukhopadhyay, 2019; Mukhopadhyay and Sarangapani, 2018). The influence of neoliberal discourse in Indian education is further discussed in Section 2.4.3 focusing on TE.

2.3.3 Higher education

This section first gives an overview of HE subsector in India followed by the quality assurance of HE in India, the topic of this study.

Overview of higher education in India

At the time of India's independence in 1947, there were only 20 universities and 500 colleges with student enrolment of 0.2 million. Since then, the Indian HE sector has shown an impressive expansion. In 2016, India had the second largest number of tertiary student enrolment (32 million) after China (44 million) (UNESCO, 2020). As of 2018, an enrolment is nearly 36.3 million (UGC, 2018). Figure 3 shows the accelerating growth of enrolment in Indian HE.
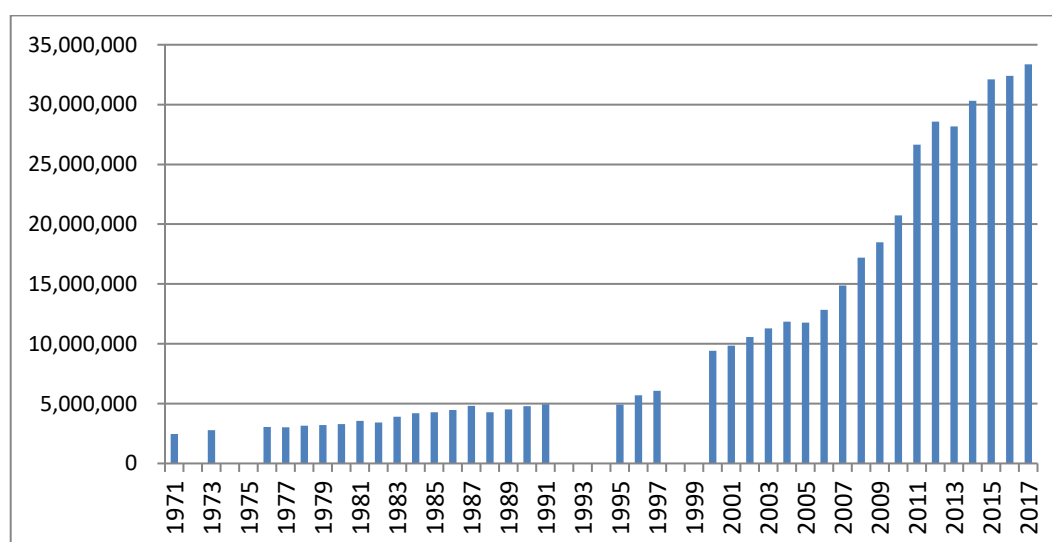
Figure 3: Enrolment at higher education in India

Source: (UIS, 2020)

One of the features of Indian HE is a large number of colleges, which offer only a single programme and have fewer than 100 students (Government of India, 2020). As of 2018, there are 851 universities and 41,012 colleges, and around 21% of students enrol at universities while 79% enrol at colleges. Overall 52 % of students in colleges are male while at universities, a larger proportion of 58% are male (UGC, 2018).

The rapid growth is partly due to the growth of private Higher Education Institutions (HEIs) which have expanded since the 1990s through the reduction in public expenditures and the introduction of cost-recovery measures (Béteille et al., 2019; Tilak, 2002). As a result, a large proportion of the private sector is another feature of Indian HE

system (Béteille et al., 2019). As of 2018, 35% of universities and 78% colleges are private (UGC, 2018). From an early stage of this rapid expansion, serious concerns have been raised over the quality of HE and its maintenance (Gupta and Gupta, 2012; Singh, 2003). The NEP 2020 regards severe fragmentation of HE ecosystem as a fundamental problem, and proposes to move to large multidisciplinary universities and HEIs clusters as the highest recommendation for HE (Government of India, 2020).

Quality assurance of higher education in India

This part reviews the key actors tasked to ensure the quality of HE in India. In addition to the MHRD that has overall responsibility for education in India, the following bodies play roles in determining and maintaining the HE standards: the University Grants Commission (UGC), regulatory bodies for various disciplines, the affiliation system, funding agencies, and the NAAC (Stella, 2002). The UGC is the only grant-giving agency in India's HE sub-sector which has been vested with the responsibilities of providing funds and coordinating, determining and maintaining standards in institutions of HE (UGC, 2017). Regulatory bodies such as the NCTE and the Medical Council play important roles in setting and ensuring acceptable standards of particular professionals and their education (Stella, 2002). Funders of HEIs including central government, state governments and private entities also play a role in monitoring quality of HEIs they fund. For colleges, public universities are key actors to ensure quality through the affiliation system, where designated public universities (affiliating universities) in the region help ensure quality of nonautonomous colleges (affiliated colleges) (Béteille et al., 2019; Stella, 2002). The affiliation system is important for TE colleges and is explained later in the chapter.

In addition to these traditional mechanisms, the UGC established the National Assessment and Accreditation Council (NAAC) in 1994 as an autonomous institution. The NAAC official website explains its establishment as follows: there was a widespread concern about the quality and relevance of HE in India in the context of expansion, privatisation, increased autonomy and introduction of programmes in new and emerging areas; to address these concerns, the National Policy on Education (NPE 1986) and the Programme of Action (PoA,1986/ 92) spelt out strategic plans for the establishment of an independent national accreditation agency to assure the quality of HEIs (NAAC, 2019). This NAAC is one party that started the accreditation of degree-level TE programmes in India, the policy of the study.

2.4   Teacher education in India

This section first gives an overview of TE system in India (2.4.1), then introduces the regulation mechanisms to assure the quality of TE (2.4.2), followed by the discourses on teachers and TE (2.4.3).

2.4.1   Overview

The minimum qualifications required to be school teachers for different types and levels are determined in *the Regulation* set by the NCTE, the national apex body for TE in India (NCTE, 2011a). There have been several amendments in the requirement in the past two decades, but the minimum qualification for pre-primary and primary teachers has been diploma and teachers for grade 6 and above have been required to have graduate or higher degrees (see appendix 1 for the changes of requirement over time). The NEP 2020 envisages raising the minimum qualification for teaching to a 4-year integrated B.Ed. degree by 2030 (Government of India, 2020).

The NCTE also determines the list of TE courses that can be offered by teacher education institutions (TEIs) in India, and sets *the norms and standards* for each course which specify requirements such as the entry requirement, duration, working days, staff requirements and facilities (NCTE, 2011a). While there are more than 10 TE courses (see appendix 1 for more information), the most commonly offered courses are Diploma in Elementary Education (D.El.Ed.) and Bachelor of Education (B.Ed.). D.El.Ed. course prepares primary teachers and requires high school graduation as an entry requirement. The majority of B.Ed. courses employ a consecutive model of TE, which requires candidates to complete a first degree in a discipline related to the subject taught in schools before taking TE course focusing on pedagogy. B.Ed. course was one year in duration and extended to two years from 2015 academic year. There are also a few TEIs providing four-year integrated B.Ed. degrees as a concurrent integrated model that teach both subject content and pedagogy.

The table below shows a summary of the number of TEIs and courses according to the data from the NCTE website (NCTE, 2019). There are 25,727 courses provide by 19,542 TEIs as of 30 June 2019. Most of them are small and stand-alone TE colleges that offer only a single course (Government of India, 2020). A large private sector is another distinctive feature. About 88 percent of TEIs offering diploma courses and about 96 percent of those offering B.Ed. are in the private sector (Menon and Mathew, 2016).

Table 2: Number of teacher education institutions and courses

No.	Name of the State	Total Number of TEIs	Total Number of Courses
1	Arunachal Pradesh	21	29
2	Assam	116	154
3	Bihar	425	699
4	Jharkhand	165	261
5	Manipur	25	29
6	Meghalaya	18	18
7	Mizoram	11	17
8	Nagaland	14	15
9	Odisha	118	150
10	Sikkim	8	9
11	Tripura	14	24
12	West Bengal	864	1,369
13	Chandigarh	10	17
14	Delhi	91	176
15	Haryana	673	726
16	Himachal Pradesh	122	160
17	Punjab	384	582
18	Rajasthan	1,024	1,931
19	Uttar Pradesh	5,315	7,122
20	Uttarakhand	106	137
21	Andaman and Nicobar	1	4
22	Andhra Pradesh	2,042	2,042
23	Karnataka	1,531	1,531
24	Kerala	491	491
25	Lakshadweep	2	2
26	Pondicherry	88	88
27	Tamil Nadu	2,158	2,158
28	Telangana	792	792
29	Chhattisgarh	246	292
30	Dadra & Nagar Haveli	1	1
31	Daman and Diu	3	3
32	Goa	9	14
33	Gujarat	415	694
34	Madhya Pradesh	980	1,834
35	Maharashtra	1,259	2,156
	Grand Total	**19,542**	**25,727**

Source: The NCTE website (NCTE, 2019).

What has been repeatedly raised in the history of Indian TE is the concern over its quality. For example, a report by the NCTE (2009a, p. 6) states that TEIs are 'extremely inadequate and poorly managed in most states'; in addition, a report by the World Bank

(2009, p. 12) writes TE 'suffers from poor standards, weak accreditation and monitoring, outdated pedagogical approaches, inadequate supplies of basic teaching and learning materials (including ICTs), and few incentives for improvement'. The NEP 2020 summarises its serious concerns quoting the landmark report:

> According to the Justice J. S. Verma Commission (2012) constituted by the Supreme Court, a majority of stand-alone TEIs – over 10,000 in number are not even attempting serious teacher education but are essentially selling degrees for a price. Regulatory efforts so far have neither been able to curb the malpractices in the system, nor enforce basic standards for quality, and in fact have had the negative effect of curbing the growth of excellence and innovation in the sector. The sector and its regulatory system are, therefore, in urgent need of revitalization through radical action, in order to raise standards and restore integrity, credibility, efficacy, and high quality to the teacher education system (Government of India, 2020, p. 42).

In response to the grave concern, a strong commitment is expressed in the NEP 2020 to change the status of TE:

> In order to improve and reach the levels of integrity and credibility required to restore the prestige of the teaching profession, the Regulatory System shall be empowered to take stringent action against substandard and dysfunctional teacher education institutions (TEIs) that do not meet basic educational criteria, after giving one year for remedy of the breaches. By 2030, only educationally sound, multidisciplinary, and integrated teacher education programmes shall be in force. (Government of India, 2020, p. 42).

Other reforms envisaged in the NEP 2020 include: all stand-alone TEIs will be converted to multidisciplinary institutions by 2025; HEIs can offer 4-year integrated B.Ed. and 2-year B.Ed. for outstanding students who have already received a Bachelor's degree in a specialised subject; and the admission to pre-service TE program will be conducted by a single nation-wide entrance examination.

2.4.2 Regulatory system to assure the quality of degree-level teacher education

This section introduces the key actors and mechanisms in regulating degree-level TE, since the policy of this study is a part of the regulatory efforts. While the governance mechanisms for degree-level TE as a part of HE is different from non-degree level, this section focuses on degree-level TE, as the NCTE-NAAC accreditation only applies to this segment. It first describes the responsibilities of the key actors, followed by the comparison of the key regulatory mechanisms.

The University Grant Commission

The UGC was formally established in 1956 as a statutory body of the Government of India through an Act of Parliament and was given two responsibilities: that of providing funds and that of coordination, determination and maintenance of standards in HEIs

(UGC, 2017). TEIs preparing the degree-level teachers fall under the purview of the UGC. The UGC mainly uses the affiliation system for overseeing colleges, which is explained below.

Affiliating universities

The affiliation system, a legacy of British governance, continues to play a dominant role in South Asia including India. Only university-level institutions are granted the power to award degrees and nonautonomous colleges (affiliated colleges) need to affiliate with designated public universities (affiliating universities) in the region to operate degree-level courses (Béteille et al., 2019). The affiliating universities have a responsibility to ensure the quality of the affiliated colleges and have substantial authority over academic aspects of colleges including setting curricula, conducting examinations and awarding degrees (Stella, 2002). Universities set their own standards for affiliation, conduct on-site inspection and affiliate only those which meet the standards. Regular inspection is conducted as affiliation is time-bound and can be withdrawn in case of non-compliance. Since most of the TE providers are small and stand-alone colleges, traditionally, affiliating universities have been the main actor for overseeing degree-level TE. For example, the Programme of Action, which is the implementation strategy paper for the National Education Policy of 1986 describes the secondary[2] TE governance as follows:

> The responsibility for secondary teacher education would continue to rest with Colleges of Teacher Education affiliated to Universities. The university in co-operation with NCTE will exercise responsibility for academic aspects including conduct of examinations, award of degrees and ensuring quality of secondary teacher education institutions (Government of India, 1986, p. 44).

The quote describes that the affiliating universities had a primary role to assure the quality of TE colleges. The NCTE is mentioned here in a secondary capacity, as it only had an advisory status without regulating authority in 1986. However, concern over the effectiveness of the affiliation system has been repeatedly raised, and the NEP 2020 proposes gradually phasing out the affiliation system over a period of 15 years and a mechanism is to be established for granting graded autonomy to colleges (Government of India, 2020).

The NCTE

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[2] In 1986, secondary teachers were required to have degrees, while primary teachers were required to have diploma. See appendix 1 for the changes in the minimum requirements of teachers over time.

The establishment of the NCTE in India was a result of a long-felt need to bring about standardisation in TE. The report from the Education Commission (1964-66) describes the key issue of TE of that period as follows:

> Institutions that prepare teachers for the primary and secondary schools show a bewildering variety of courses, conditions of work, and quality of teachers turned out. It is unfortunate that there is no organization, at the State or national level, for ensuring standards in teacher education. The need for such organizations is increasingly realized and a number of suggestions have been put forward (Education Commission, 1966, p. 142).

It suggests that the policy problem of `bewildering variety' of TE needs to be addressed by regulation and standardisation. At that point, colleges of TE were overseen through the affiliation system, whereby the affiliating universities set their own standards for affiliation, indicative of the absence of national uniformity. To this end, the NCTE was established in 1973 as an advisory body on all matters pertaining to TE in India. To bring uniformity, the NCTE set *norms and standards* that specify the requirement for different TE courses such as the duration, working days, staff requirements and facilities (NCTE, 2011a). The NCTE reviews and revises norms and standards when they deem necessary.

However, its impact was limited due to its advisory status. Consequently, recommendations were made to give it statutory status. The report from the National Commission on Teachers argues:

> It is necessary, in our judgment, that such a body be vested with statutory powers to enable it to develop and prescribe uniform norms for the maintenance and refinement of academic standards and to monitor them effectively (The National Commission on Teachers, 1986, p. 137).

After the same recommendation was repeated in the Programme of Action in 1986 and 1992, the NCTE was given statutory status by the National Council for Teacher Education Act, 1993 (No. 73 of 1993) on the 17th August 1995. The NCTE Act provides the organisation with the power to enforce the regulations and ensure that proper maintenance of *the norms and standards* it prescribes for TE providers. With the Act, the NCTE became the apex body for determining the standards of TE and the teacher qualification in India. Every institution, regardless of their status - university, affiliated college, or any other institution with special status - offering or intending to offer a TE course needs to obtain permission to operate from the NCTE, which is called *recognition*. Upon receipt of application for *recognition*, the NCTE inspectors conduct a documentation verification and on-site check. The NCTE gives *recognition* when an applicant institution satisfies all the requirements specified in *the norms and standards*. It is a one-time exercise and institutions are normally given permanent recognition

(NCTE, 2011a). However, the recognition may be withdrawn in case contravention is reported (NCTE Act, Section 17).

The Act also gives the NCTE authority and responsibility to monitor the quality of recognised institutions, though the difference is not clearly explained in the policy text: that is how to conduct inspection (Section 13 Inspection); examine and review periodically the implementation of the norms, guidelines and standards (Section 12 Functions of the Council (j)); and evolve suitable performance appraisal system, norms and mechanism for enforcing accountability of recognised institutions (Section 12 Functions of the Council (k)). While the *recognition* is defined as a mandatory requirement for opening a new course, the frequency of monitoring is not specified in the Act.

In 2002, the NCTE and the NAAC signed their first Memorandum of Understanding (MoU) as a formal agreement to collaborate and start the assessment and accreditation of degree-level TE programmes, which is the policy being analysed in this study (the NCTE-NAAC accreditation). It was hoped that this would lead to improvements in quality to reach higher standards; something that had not been achieved effectively by the existing regulatory mechanisms (NCTE, 2009; Stella, 2002). The NAAC had been giving accreditation to HEIs since 1994, but with this MoU, it was agreed that the NAAC would extend their work to teacher education programmes. The MoU was renewed several times, and their collaboration continued for fifteen years till its termination in 2017.

State governments

While state governments play a limited role in monitoring the quality of degree-level TE, they have some control over the opening of new TE courses in their jurisdiction. Since 1995 to 2007, it was obligatory for colleges to obtain 'a non-objection certificate' (NOC) from the concerned state government before applying for NCTE *recognition* to open new courses. The requirement of NOC came under criticism where the critics argued the NCTE was abdicating its responsibility. The issue was challenged in various courts, and finally resolved in the Supreme Court in 2003 when it upheld the validity of the requirement of NOC (NCTE, 2003a). Currently, instead of issuing individual NOC, state governments in their legislative assembly pass a Government Order when they do not wish new courses to be opened, which can be found on the NCTE homepage (see appendix 1 for details).

Comparison of the three mechanisms

In summary, the three important mechanisms to assure the quality of degree-level TE, i.e. the affiliation system, the NCTE recognition, and the NCTE-NAAC accreditation at the point of introduction in 2002, are compared (Table 3). For a quarter of a century after the Indian independence in 1947, the affiliation system inherited from the British colonial period was the key instrument to assure the quality of TE colleges. Thereafter, the NCTE's *norms and standards* for TE courses were issued as recommendation in 1973, which became mandatory in 1995 as *recognition*. In 2002, the NCTE-NAAC accreditation was introduced.

Table 3: Summary of characteristics of the three systems

Tool	Start	Scope	Target	Validity	Status
University affiliation	Before 1947	Regional	TE colleges	Time-bound and periodical renewal required	Mandatory
NCTE recognition	1995	National	All TE course providers (universities and colleges)	Permanent, with possibility of withdrawal	Mandatory
NCTE-NAAC accreditation	2002	National	Degree level TE course providers (universities and colleges)	5 years	Optional

Source: researcher's compilation

All three mechanisms are similar in the sense that they evaluate the quality of TE programmes and providers based on the pre-determined criteria or standards and make judgement of pass-fail results. There are also differences. Though standards used for the NCTE recognition and the NCTE-NAAC accreditation are nationally uniform, each university sets its own standards for affiliation. While the validity of the assessment result of the affiliation system and the NCTE-NAAC accreditation are time-bound, the NCTE recognition is permanent. The affiliation and the NCTE recognition are obligatory for colleges to operate, while the NCTE-NAAC accreditation was optional.

2.4.3 Discourses on teachers and teacher education

This section reviews the shift in policy environment and discourses surrounding teachers and TE in India. In 2009, Batra (2009) argued that TE in India was a stagnant discipline and profession for over 50 years and the issue of teachers had been systematically neglected by policy-makers and educational planners. She calls the 1960s and 1970s as 'lost opportunity' that failed to recognise the critical role of education for national development. The NEP 1986 brought some positive changes including the development of institutional structure for the pre-service TE, but Indian economist and planners were of the opinion that India could not afford to have adequately trained teachers for the

masses (Batra, 2009). Since the 1990s there has been a series of post-liberalisation interventions which have rapidly improved school access, as reviewed earlier. In this shift, neoliberal discourse, New Public Management (NPM) in particular, that reframed teachers' work through an 'accountability' lens has led to the assumption that teachers have been unaccountable and unable to deliver, which in turn suggests solutions such as contractual teachers, performance-based pay and increased monitoring (Mukhopadhyay and Ali, 2020). Teachers in the discourse of NPM are conceptualised as "inputs" in the educational system to deliver outcome as learning achievements (Sayed and Sarangapani, 2020). This may have a link to the policy space where the school teachers are largely marginal in the policy discussion (Batra, 2013).

However, Batra (2014) argues that this neoliberal discourse contrasts with the academic-led discourse of education that re-affirms the central role of teachers as agents of social transformation, which underpins the National Curriculum Framework (NCF) and the National Curriculum Framework for Teacher Education (NCFTE) (NCTE, 2009a). Indeed, the NCFTE that serves as the guideline for universities to develop TE course curriculum suggests professionalisation of TE and development of an integrated programme to adequately prepare teachers (NCTE, 2009b). These strikingly different discourses shape the policy space: while policy makers argue the need to improve the quality of teachers in line with the NCFTE, the adopted policy instruments reflect neoliberal perspective of education such as teacher accountability rather than teacher development (Batra, 2014). Although a political consensus around the need to universalise elementary education appeared to have been forged in India, a contested policy space with different ideologies of academia, the bureaucracy and politicians remain (Batra, 2013).

While Batra (2013, p. 219) argued that 'the most serious unaddressed issue is the critical role of the teacher', there may be an increased attention to teachers since then. The NEP 2020 spares significant portion on various issues relating to teachers (clause 5.1 – 5.29) and dedicates section for TE (15.1 – 15.11) (nearly six pages in the 62-page document) (Government of India, 2020). This is in contrast with the NPE 1986/92 that had only 3 clauses for teachers (9.1 – 9.3) and TE (9.4 - 9.6) (slightly more than one page in the 45-page document). The NEP 2020 emphasise the critical role teachers play to shape the future of the nation and the vital role of TE to prepare those teachers. The professionalisation of teachers seems to be envisaged in the plans of the NEP 2020 such as career path, continuous opportunities for self-improvement, upgrading minimum qualification of teachers, and converting colleges to multidisciplinary colleges. Although

implementation is yet to come, the NEP 2020 may indicate some shift in the policy discourse in the last decade.

2.5   Summary

This section reviewed the key context of the study including the socio-economic situation (2.2), school education and higher education (2.3), and teacher education (2.4). This section shows that since the 1990s, there has been economic liberalisation and the rapid expansion in access to education. The change has resulted in the growth of private providers and a shift in education discourses influenced by neoliberal framing of education. It is important to understand that the NCTE-NAAC accreditation policy, the policy of the study, was formulated in 2002 during this changing landscape of education in India.

The mechanisms to ensure the quality of HE and TE were also reviewed, because the NCTE-NAAC accreditation was created as a part of regulatory efforts to ensure quality of degree-level TE in India. The review suggests that multiple mechanisms were already in place to oversee the quality of TE, such as the affiliation system and the NCTE recognition, whereby the NCTE-NAAC accreditation was added in 2002. However, these mechanisms are later evaluated as failure, as the NEP 2020, quoting the Justice J S Verma Commission report, states that the regulatory efforts so far failed to 'enforce basic standards for quality, and in fact have had the negative effect of curbing the growth of excellence and innovation in the sector' (Government of India, 2020, p. 40). To reflect the significance of the policy of the study, it is important to locate it in this historical context.

The next chapter reviews key literature for the study. Some of the key developments observed in the Indian national context such as the influence of neoliberal discourse in education are in fact the reflections of the global discourse shifts, which are examined in the next chapter.

Chapter 3 - Literature review

3.1 Introduction

This chapter offers a review of the literature. The focus of the study is on the making of teacher education (TE) accreditation policy in India with specific focus on how global discourses influenced and shaped this process. As such, this literature review mainly considers and reviews global discursive trends about TE accreditation. It begins with the key macro context of the study, globalising education policy (3.2); followed by the examination of sub-sector context, changing higher education (HE) and its increasing focus on quality (3.3). It then extensively reviews the literature on external quality assurance (EQA) in HE and teacher education, the topic of the study (3.4). The subsequent section discusses approaches to policy study (3.5). Finally, the theoretical framework of this study is presented to synthesise the literature review (3.6).

3.2 Globalising education policy

Globalisation affects education policy in multiple ways and is profoundly altering the education policy landscape. It shapes the problems in education agendas to the point that some education policies such as child-centred pedagogies and public-private partnerships have become regarded as 'global education policies' (GEPs) (Verger et al., 2018). The topic of this study, EQA and accreditation in particular is one of the popular policies of HE worldwide and can be considered as a GEP. Although thoroughly examining the impact of globalisation on education policy is beyond the scope of this study, some aspects that are particularly relevant to my study are discussed below to provide an important backdrop to understand the policy of EQA: international policy convergence and the role of international organisations (IOs); the shifts in national policy-making space; and dominance of neoliberal policy paradigm.

International policy convergence and the role of IOs

Scholars studying the globalisation of education policy refer to the research using various terms such as 'global education policy', 'policy diffusion', 'policy borrowing', 'policy transfer' or 'policy convergence', among others (Steiner-Khamsi, 2016; Verger et al., 2018). Policy borrowing may occur within a state, but policy-makers are increasingly likely to seek solutions abroad (Dolowitz and Marsh, 2000). Once a critical number of countries adopt a policy, it seems the policy becomes *global* and is traded as a *global model* (Steiner-Khamsi, 2010). The most well-known GEPs have an origin, which was usually Western and, more precisely, Anglo-Saxon (Verger et al., 2018). EQA also

seems to have such *global model* status originating in Europe and the USA (Harvey and Williams, 2010).

In the era of GEPs, the mechanisms of policy diffusion such as the role of IOs and other types of transnational actors in setting global/regional policy agenda have acquired particular attention (Verger et al., 2018). In this sense, IOs may be conceptualised as key transmitters of particular views of education and educational reform. For example, IOs such as OECD, World Bank, UNESCO and EU play powerful roles in national policy-making and directly or indirectly promote a range of specific ideas (Rizvi and Lingard, 2009, 2006; Taylor and Henry, 2000). Dale (1999) systematises a range of mechanisms such as imposition, harmonisation, dissemination and standardisation that allow IOs and other external actors to frame and influence national education policies. The IOs in the case of EQA is discussed in Section 3.4.3. It is noted that, although the role of IOs in global policy convergence is an important theme to study in its own right, in order to focus on national policy-making space, this study chose the case of India where the policy adoption was initiated by national actors.

There are different approaches that study the relationship between globalisation and educational policy. The world-culture approach (also known as 'World Society' theory) posits that the 'diffusion' of the Western modernist cultural scripts has resulted in the gradual convergence of education systems across the globe (Takayama et al., 2016). It problematises the assumption that education measures are applicable globally, and argues that this phenomenon is particularly challenging for developing countries as they feel similar pressures to comply with global educational reform imperatives despite limited resources they have compared to the countries of the policy origin (Meyer et al., 1997; Verger et al., 2018). Another approach questions the assumed 'diffusion' of global models around the world and looks closely at the local context that conditions trans-national policy transfers. These studies stress the importance of understanding the local contexts where *global* policies are heavily mediated through domestic cultural and institutional logics while political and economic interests drive adoption of such policies (Takayama et al., 2016). Some of these studies even suggest that the assumed convergence in education policy may be superficial and dispel notions of shared World Culture (Rappleye, 2012). Verger (2014) argues that these apparent contrasting conclusions of convergence-divergence are due to the fact that the former approach focuses on a policy agenda setting stage while the latter focuses on the policy enactment stage. This study focuses on slightly different and relatively less studied point, policy adoption, which is explained in Section 3.6.1, Focus of the study.

Shifts in national education policy-making space

Globalisation has also brought changes in the national policy-making space. National policies were once considered an exclusively national process (Rizvi and Lingard, 2009). However, the force of international policy convergence contributes to redefinition of the scale, the space and the dynamics through which education policy is being negotiated and the 'national' territory loses its centrality in such processes (Robertson, 2018). In other words, globalisation has extended the frame of reference for national policy-making, and national policies are now forged in globally networked spaces. National policymakers are now linked to various international and supranational organisations, constituting part of the global education policy community and its networks, although national policy-making remains a national activity (Rizvi and Lingard, 2009). How these national policy actors play a role to mediate and enact global education policies in national policy-making space is a crucial part of the study on the relationship between globalisation and educational policy, which this study also focuses on.

These changes link to a more fundamental change in the role of state, and there is substantial global governance literature that describes the phenomenon of 'governance without government' (Rosenau and Czempiel, 1992) or 'deterritorialization' (Appadurai, 1996) as the territory loses its significance and power in everyday social life. Rizvi & Lingard (2009) argue that globalisation destabilised the Westphalian assumptions of the nation-state, which includes the state's authoritative monopoly over policies within its territory. This shift in governance makes it important for education policy studies to examine the influence of global contexts and discourses. If this represents shift of locus of power to international scale, as Robertson (2012) suggests, this would have serious social justice implications for national citizens, who have few means for political contestation.

Dominance of the neoliberal policy paradigm

The last aspect discussed in this section is a globally dominant political-economic ideology, neoliberalism. Though being a dominant economic discourse, this is a loosely used term rather than a complete political philosophy (Ball, 2016a; Thorsen and Lie, 2006). In many Western nations, it constituted a general transformation of the dominant economic discourse and the role of the state, i.e. a paradigm shift away from an interventionist form of government activity mainly based on the Keynesian paradigm towards a less intrusive one (Osborne and Gaebler, 1992). It is generally associated with policies of economic liberalisation including deregulation, privatisation and reduction in

government spending. Thorsen and Lie (2006, p. 14) pragmatically defines it 'a loosely demarcated set of political beliefs which most prominently and prototypically include the conviction that the only legitimate purpose of the state is to safeguard individual, especially commercial, liberty, as well as strong private property rights'.

The dominance of neoliberal discourses has reshaped education policy orientations, making many policy-makers and practitioners around the globe interiorise ideas such as deregulation, privatisation, decentralisation, performance-based incentives, competitive funding, and increasing demand for accountability in education to the extent that they have become a sort of common sense (Carney, 2009; Rizvi and Lingard, 2009). The neoliberal framing of education policy was also observed in India, as discussed in Section 2.3.2. Responding to the increasing accountability demand over the last three decades, education systems in many countries have adopted regimes of assessment-based, numbers-driven accountability to steer educational practice (Lingard et al., 2015, 2013; Rutledge et al., 2013). These discourses frame many GEPs including EQA.

The impact of globalisation on education policy discussed in this section including policy convergence, the shift in national policy-making space and dominant neoliberal discourse broadly frames this study. In the next section, the changing HE and its increasing attention to quality is reviewed to better understand the context and how the modern EQA in HE has emerged as a GEP.

3.3   Changing higher education and focus on quality

The landscape of HE in many countries has been drastically changing. Rapid expansion, privatisation, internationalisation of HE and globalisation of economic activities have heightened concerns about the quality of HE in developed and developing countries for the last few decades (Doiz et al., 2013; Martin and Stella, 2007; OECD, 2009; Tremblay et al., 2012). This section investigates how the global HE scene has changed. Moreover, it highlights how addressing the quality of HE has become increasingly urgent in many contexts, leading to the global popularity of EQA.

Massification, internationalisation, privatisation of higher education and quality
According to Harvey and Williams (2010, p.4), 'massification, internationalisation and marketisation have been amongst the most fundamental changes' in the HE sector and all of them, arguably, have had an impact on quality. These three changes and their implications on quality are briefly discussed in turn. The rapid growth of HE especially

private providers in India discussed in Chapter 2 needs to be understood in this global context.

Massification is a term used to describe the global rapid expansion of HE during the last few decades. Globally tertiary gross enrolment ratio has risen from 13.6 % in 1990 to 38.0 % in 2018 (UNESCO, 2020). Massification poses challenges to the governance and quality of HE: the traditional form of HE seen as centres of elite education now needs to be able to govern mass HE and maintain quality (Hornsby and Osman, 2014; Shawer, 2012).

The internationalisation of HE has also steadily increased since the 1990s and it has transformed the practices in HE sector, sometimes with the development of new information technology. It manifests in various ways, including international harmonisation of HE systems, considerable increase of cross-border HE, the emergence of worldwide university rankings, and massive open online courses (MOOC) (OECD, 2009). Moreover, the globalisation of economic activities is leading to the harmonisation of professional activities and increased mobility of professionals, which create pressures on HEIs to assure the quality of qualifications and degrees, and their compatibility with international educational standards (Hernes and Martin, 2008).

The increase in the marketisation and privatisation of HE is an undeniable phenomenon in many countries, including India. It leads to the transformation of centralised public HE by the state, through introducing deregulation, reducing state subsidies, allowing private providers, and introducing some form of privatisation in public HE (Altbach et al., 2009; Whitty and Power, 2000). According to Levy (2019), during the last few decades private HE has grabbed an increasing share of total students, and it is now estimated to be 75 million students in total and one in three students globally is enrolled in private HEIs. While the US has historically excelled in terms of its private HEIs, India has emerged as the new giant with over 12 million private enrolments (Levy, 2019). An increase in private providers also has implication for education quality, as it raises concern over the maintenance of educational standards by diversified providers.

Globalisation and its impact, discussed in Section 3.2, provides the key context of changes in HE, including privatisation and marketisation under the neoliberal framing of education. Globalisation and shifts in HE alter national governance and the role of the state in HE provision, which is discussed next.

Shift in discourse of governance of higher education

Following the discussion of the global influence of neoliberalism in education in Section 3.2 and in the Indian context in Chapter 2, this part further examines the discourse shift in the governance of HE. Under neoliberalism, New Public Management (NPM), a public management theory aiming to modernise public service, has been particularly influential on government policies since the 1980s. Ferlie et al (1996) describes NPM as the introduction of the 'three Ms', markets, managers, and measurement into public services. NPM has brought quasi-markets in public sector management and limits direct government interventions by deregulation, decentralisation, privatisation and stronger institutional autonomy. In turn, it stresses performativity, as evidenced by the measured outputs and enhanced mechanisms of quality control at a distance, with a focus on public accountability (Martin and Stella, 2007; Olssen and Peters, 2005). Olssen and Peters (2005) claim that the neoliberal perspective sees the state's positive role in the market to engineer disciplinary mechanisms for efficient economic production through means such as auditing, accounting and management. This is in contrast to the classical view of a self-regulating market.

Neoliberalism and NPM has led to the redefinition of the role of the state in the organisation of HE systems. Traditionally, HE governance was characterised by an autonomy based on trust in professionals and a public service ethic, and democratic governance in line with the classical liberal notion of academic freedom. NPM has transformed this into a new set of contractualist norms and rules of managerialised accountability (Lynch et al., 2012; Olssen and Peters, 2005). Increased demand for public accountability has led to the specification of goals and measurable quality standards, then legitimising regulations to ensure and measure standards of performance (Ranson, 2003). Many scholars discuss this strong emphasis on measurement of performance as characteristic of modern governance. Neave (2012, 1998) for example terms it as 'evaluative state', in which governments adopt a posteriori analysis to evaluate outcomes of HE instead of traditional direct inputs or process control. Strathern (2000) and Power (1999) similarly discusses pervasive 'audit cultures' and 'audit society' in HE; and Ball (2012, 2003, 2001) wrote about the impact of performativity cultures in education.

This shift of governance discourse has intensified the focus on the quality of HE and how it is measured (Doiz et al., 2013; Martin and Stella, 2007; OECD, 2009), which is sometimes referred to as 'quality imperative' (Houston, 2008), or 'quality revolution' (Newton, 2010). It has also led to the redefinition of the way HEIs define and justify their

existence. HEIs need to be able to provide evidence to support claims of quality. This in turn accorded power and responsibility to managers creating a form of managerialism focused on achievement and measurement of outcome. One of the risks of this trend is that education may be reduced to an input-output system similar to an economic production function with an excess focus on measurable outputs (Olssen and Peters, 2005; Sayed and Sarangapani, 2020). The next section investigates the concept of quality in HE and issues in measuring it.

Concept of quality in higher education and measuring It

It is important for this study to investigate the concept of *quality*, as it provides the conceptual underpinnings for EQA systems. How the concept of *quality* is defined in the studied case is examined in Chapter 6.

Quality is a contested term, with multiple meanings and interpretations (Harvey and Williams, 2010). Academics have tried to define *quality* in HE, but there has been no consensus (Schindler et al., 2015). A synthesis of literature about the definition of *quality* in HE by Schindler et al. (2015) identifies two major approaches to define it. The first approach defines it as broad central goals and outcomes. Schindler et al. (2015) identify four different dimensions of *quality* in the literature: *quality* as purposeful, transformative, exceptional, and accountable. These conceptualisations have not changed much since definitions were first attempted in the 1990s (for example, (Harvey and Green, 1993)). Different stakeholders may value the importance of these dimensions according to their particular expectations. For example, *quality* as 'exceptional' is a traditional definition that links quality to the virtue of the academic community, 'accountable' is particularly important to government for the accountable use of public funds, while 'purposeful' is a pragmatic concept for many institutions to assess whether they are achieving own goals (Brink, 2010; Harvey and Green, 1993; Saarinen, 2010; Woodhouse, 1999). Harvey (2006) argues that EQA must uncover the 'transformative' nature of *quality* as it captures the dynamic and continuous essence of quality in the educational process while other definitions merely assess outcomes against criteria.

The second approach is to define a set of specific indicators (Schindler et al., 2015). This is a pragmatic approach to define education *quality* by referring to indicator systems and declaring that education *quality* is what these indicator systems describe and measure (Scheerens, 2004). Though this approach is useful, the following concern about indicators by Barnett remains valid:

> What counts as quality is contested. The different views of quality generate different methods of assessing quality and in particular alternative sets of performance indicators (PIs). However, PIs are highly limited in their informational content, and have nothing to tell us about the quality of the educational process (Barnett, 1994, p. 68).

HE is a process of transforming students, which is not amenable to any kind of simple measurement of a limited number of indicators and input and output analysis (Becket and Brookes, 2008; Tam, 2001). Harvey (1995) further argues that there is no discernible end product of HE as the transformative process continues to make an impact after the completion of education.

As the discussion above indicates, *quality* remains a contested term to date. The core challenge in defining *quality* is that it is an elusive term that allows a variety of interpretations depending on the interest, values, and circumstances of stakeholders (Newton, 2010; Watty, 2003). Moreover, *quality* is a multi-dimensional concept that cannot be reduced to succinct definition; and it is not static but an ever-changing pursuit of excellence (Schindler et al., 2015). The stakeholder-relative, multi-dimensional, and ever-changing nature of *quality* causes inherent problems and complexities for its measurement and management (Becket and Brookes, 2008). *Quality* may be legitimately defined differently, which leads to differences in the selection of criteria and assessment methods, and thus different evaluation results (Barnett, 1994; Tam, 2001). For this study, I also support the claim that *quality* in HQ is stakeholder-relative. This presents practical difficulties to EQA agencies, as they usually employ one set of criteria to assess diverse HEIs, and their assessment should be fair and acceptable to varied stakeholders. An important implication is that it is crucial to include all stakeholders in the discussion to define *quality* to ensure different perspectives and needs are incorporated to improve its acceptance (Bobby, 2014; Cullen et al., 2003).

In order to illustrate issues around indicators to measure the performance of HEIs, the discussion about league tables is reviewed here. Leagues tables showing university rankings have become popular in the last decades. Among critiques from various perspectives, those related to indicators include: many indicators of similar nature are often chosen rendering some of them redundant (Soh, 2017); the choice of indicators is determined more by their availability than by reasons of reflecting excellence in performance (Locke et al., 2008); few satisfactory reasons are provided for the choice of weighting (Usher and Medow 2009); and it is doubtful that indicators of a different nature can mutually compensate in the weigh-and-sum approach (Soh, 2017). All of these issues raise questions about the validity of ranking results. In sum, league tables are

operationalised by different sets of indicators with different weighting schemes, which are typically not based on any justifiable model of university performance (Johnes, 2018; Locke et al., 2008). The danger is that, despite its questionable validity, league tables are so influential that universities may alter their behaviour in order to climb the league tables, which may be a deviation from what is socially optimal (Barnett and Moher, 2019; Muller, 2017). These problems together with using a composite index to reflect overall performance and risks of undesired behaviour change are all relevant to the case of assessment by EQA agencies.

Section 3.3 illustrated that rapid expansion, privatisation, internationalisation of HE and globalisation of economic activities have heightened concerns about the quality of HE in both developed and developing countries. This is the important context of the emergence of EQA emerged as a GEP. The section also revealed that the framing of issues and responses in HE such as privatisation and emphasis on performance measurement were influenced by neoliberal discourse. Despite its increasing importance, the difficulty of defining and measuring *quality* remains unresolved. Building on this understanding, the next section reviews EQA in HE.

3.4 External quality assurance in HE and TE

This section offers a review of EQA. It first reviews broad approaches to manage quality in HE (3.4.1). It then examines EQA in HE from different perspectives including the key terms (3.4.2), the rise of EQA (3.4.3), EQA mechanisms (3.4.4) and accreditation (3.4.5). It is followed by a review of EQA in TE (3.4.6). The section concludes with the note on the EQA literature (3.4.7).

3.4.1 Key approaches to managing quality in higher education

With increasing attention to the quality of HE and demand for accountability, as examined in Section 3.3, quality became regarded as something that should be managed and improved (Seymour, 1992). This section examines key quality management (QM) approaches in HE. QM is a broad concept and influential QM approaches shape EQA practices (Grünberg and Pârlea, 2007; Pratasavitskaya and Stensaker, 2010). QM is defined as follows:

> An aggregate of measures taken regularly at system or institutional level in order to assure the quality of higher education with an emphasis on improving quality as a whole. As a generic term, it covers all activities that ensure fulfilment of the quality policy and the quality objectives and responsibilities and implements them through quality planning, quality control, quality assurance, and quality improvement mechanisms (Grünberg & Pârlea, 2007, p.76).

A range of QM models developed for industry, particularly manufacturing, have been widely adapted for the use in HE. Becket and Brooks (2008) conducted a comprehensive literature review and identified eight such models that have been applied to HE internationally: Total Quality Management (TQM); EFQM excellence model; Balanced scorecard; Malcolm Baldridge award; ISO 9000 series; Business process re-engineering; and SERVQUAL (Table 4).

Table 4: Quality management models applied to HE

Model	Description
Total Quality Management (TQM)	A comprehensive management approach which requires contribution from all participants in the organisation to work towards long-term benefits for those involved and society as a whole
EFQM excellence model	Non-prescriptive framework that establishes nine criteria (divided between enablers and results), suitable for any organisation to use to assess progress towards excellence
Balanced scorecard	Performance/ strategic management system which utilises four measurement perspectives: financial; customer; internal process; and learning and growth
Malcolm Baldridge award	Based on a framework of performance excellence which can be used by organisations to improve performance. Seven categories of criteria: leadership; strategic planning; customer and market focus; measurement, analysis, and knowledge management; human resource focus; process management; and results.
ISO 9000 series	International standard for generic quality assurance systems. Concerned with continuous improvement through preventative action. Elements are customer, quality and regulatory requirement, and efforts are made to enhance customer satisfaction and achieve continuous improvement.
Business process re-engineering	System to enable redesign of business processes, systems and structures to achieve improved performance. It is concerned with change in five components: strategy; processes; technology; organisation; and culture.
SERVQUAL	Instrument designed to measure consumer perceptions and expectations regarding quality of service in five dimensions: reliability; responsiveness; assurance and empathy; and to identify where gaps exist.

Source: Becket & Brookes (2008, p.43)

Among these models, TQM is the most commonly adopted approach in many EQA systems (Law, 2010) and it is particularly important for this study as the NAAC in India, the accreditation agency of this study, has also adopted an EQA approach based on TQM. There is no agreed definition of TQM and there are multiple approaches. The underlying concepts are usually traced to the work of Shewhart in the 1920s and 1930s. Since the 1950s gurus such as Deming, Juran, Crosby, Peters, and Ishikawa have developed TQM theory, and it has become widely known as a quality theory for manufacturing industries in the 1980s (Houston, 2007). In the manufacturing industry,

TQM was a paradigm shift from traditional post-event quality inspection to holistic management approach focusing on continuous quality improvement by building quality check into each stage of the production process. TQM also emphasises cultural change within the organisation, customer-driven definitions of quality, organization-wide involvement, and leadership and teamwork (Harvey, 1995). TQM was later applied to service industries including education (Sallis, 2002). Its introduction to HE aimed to emulate its success in industry to enable HEIs to cope with increasing financial pressures and competition (Harvey, 1995; Law, 2010).

By and large, the literature is very critical of the application of industry-born QM models including TQM in HE (Jauch and Orwig, 1997; Koch, 2003; Law, 2010; Srikanthan and Dalrymple, 2005). There are several arguments for the misfit of industry-born models to HE. Firstly, in many industrial models including TQM, customers and products are key concepts but the identification of these in HE is more complex than in industries. Thus, the customer-driven definition of quality presents a fundamental problem in its application to education, as there are multiple customers/stakeholders such as students, government, parents, and employers, and each may legitimately define *quality* differently, as discussed in the preceding section (Eagle and Brennan, 2007; Harvey, 1995, 2010; Houston, 2007; Meirovich and Romar, 2006). Moreover, the students' dual role as customer and participants/products makes its application more complex (Meirovich and Romar, 2006).

Secondly, HE's fundamental focus on students' learning experience is largely ignored in business oriented reductionist models while managerialism of industry encourages academics to pay more attention to efficiency and measured outputs (Harvey, 1995; O'Mahony & Garavan, 2012). For example, the focus of improvement in TQM is the reduction of variation in core production process and products, assuming that product quality can be precisely specified in measurable terms and production process can be also defined in the same clear manner (Houston, 2007; Sallis, 2002). The discussion of QM and EQA in HE always seems to return to the problem inherited from the contestable and stakeholder-relative nature of education *quality*.

Thirdly, managerialism of industry models erode academic autonomy, which is crucially important in HE (Becket and Brookes, 2008; Harvey, 1995). Hoecht describes TQM-inspired quality system in HE as having to comply with a rigid predetermined format of performance targets and documented process accountability replacing the quest for real

teaching quality, and thus '[q]uite a number of academic writers are furious about a perceived loss of autonomy and purpose' (Hoecht, 2006, p. 542).

There are also proponents advocating QM as an effective approach to improve quality in HE (Kanji et al., 1999; Vazzana & Winter, 1997), and Doherty (2008, pp. 255, 263) describes many academics' attitude as 'pathologically averse' and 'obsessed by autonomy'. Others suggest it is effective and applicable to administrative and support functions but not to teaching and learning (Jauch and Orwig, 1997; Koch, 2003; Law, 2010; Srikanthan and Dalrymple, 2005). Some articles by Indian academics support the application of TQM to Indian HE (Ali and Shastri, 2010; Sahney et al., 2004; Sakthivel and Raju, 2006), though they are theoretical rather than based on implementation. For example, Ali and Shastri (2010) writes an extensive list of benefits of TQM including heightened employee morale, better teamwork, bridging faculty-staff functions, increased quality from customer viewpoint and continuous development of staff.

The critique has led many researchers to argue the need for a QM model developed specifically for HE which focuses more on student learning (Harvey, 1995; Houston, 2007, 2010). Such models have already been developed and implemented on limited scales, including the 'Quality Management in Education' developed by Srikanthan and Dalrymple (2005, 2002) in Australia and the 'Excellence Model' developed by Rosa et al. (2001) in Portugal. However, many of them are modifications of the industry-born models and their success or effectiveness is still to be seen (Becket and Brookes, 2008).

Overall, after two decades of critique, the industry-born QM models are still very influential in HE (Becket and Brookes, 2008) and they continue to frame the approaches of many EQA agencies in the world including the NAAC in India. The following sections examines EQA, starting with an examination of terms.

3.4.2   Examination of terms

To discuss EQA, it is crucial to first examine terms. *Quality Assurance and Accreditation: a Glossary of Basic Terms and Definitions* published by UNESCO defines quality assurance (QA) as:

> An all-embracing term referring to an ongoing, continuous process of evaluating (assessing, monitoring, guaranteeing, maintaining, and improving) the quality of a higher education system, institutions, or programmes. As a regulatory mechanism, quality assurance focuses on both accountability and improvement, providing information and judgments (not ranking) through an agreed upon and consistent process and well-established criteria. Many systems make a distinction between internal quality assurance (*i.e.* intra-

institutional practices in view of monitoring and improving the quality of higher education) and external quality assurance (*i.e.* inter or supra- institutional schemes assuring the quality of higher education institutions and programmes) (Grünberg and Pârlea, 2007, p. 74).

Many documents use similar, often simplified version of definitions. However, actual use of the term by various authors suggests a lack of consistency or standardisation in their use (Aelterman, 2006). For example, some authors differentiate the terms 'quality assurance' and 'quality enhancement' (Becket and Brookes, 2008; McKay and Kember, 1999; Skelton, 2012), implying 'quality assurance' is for accountability while 'quality enhancement' is for improvement. However, the quoted definition includes both accountability and improvement as QA purposes. The terms QA and QM are sometimes used synonymously (Grünberg & Pârlea, 2007, p.75). There are other terms used interchangeably with QA including 'quality review' (Woodhouse, 1999), 'quality evaluation' (Harvey & Newton, 2004) and 'quality monitoring' (Stensaker, 2003). While most literature often treats accreditation as one of the approaches for QA (Dill, 2000; IIEP, 2006; Kis, 2005), in some instances the terms QA and accreditation are used interchangeably reflecting its dominant status (Schindler et al., 2015). While the definition makes a distinction between internal and external quality assurance, most of the literature on QA is about external QA by QA agencies.

Given this lack of consistency and standardisation, in this study, I use the term EQA based on the UNESCO definitions above. To be precise, and following the use of the term by the renowned author Stensaker (2018a), I mainly use the term EQA in this study. Also, I treat accreditation as one of the approaches of EQA, not as an interchangeable term as QA. Thus, my study is about the EQA of TE in India, employing accreditation as an approach. The next section looks at the rise of EQA.

3.4.3 Rise of EQA and transnational policy network

In the context of heightened concern and attention to manage the quality of HE and increasing accountability demand, EQA has emerged as a response, leading many governments to consider traditional academic controls as insufficient and establishing more explicit EQA mechanisms as priority policy agenda (Altbach et al., 2009). Developing countries in particular have been under pressure to ensure and assure the quality of internationally acceptable standard (Stella, 2002). In this backdrop, many countries, both developed and developing, have established EQA agencies for HE particularly in the form of accreditation (Hernes and Martin, 2008; Kis, 2005). Figure 4 shows years that countries established formal EQA agencies (Lao, 2015; cited in

Steiner-Khamsi, 2016). It shows that several European countries established EQA agencies in the 1980s, followed by the exponential growth in the 1990s, which includes the establishment of the NAAC in India in 1994.
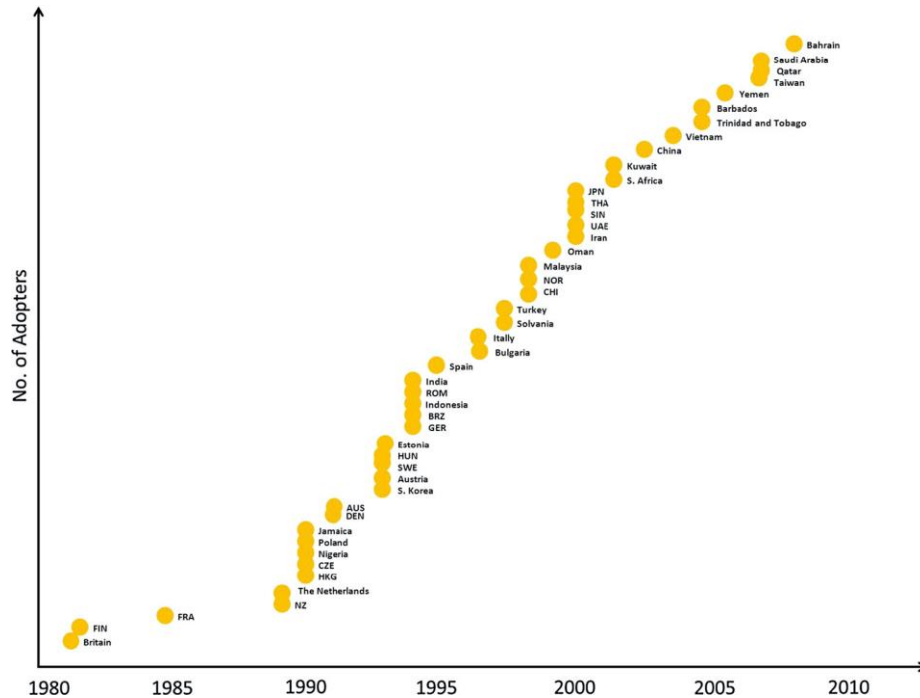
Figure 4: Global spread of EQA systems in higher education

Source: (Lao, 2015; cited in Steiner-Khamsi, 2016, p. 386)

As its diffusion indicates, EQA in HE can be considered as one of the GEP, and its policy convergence is evident. An internationally comparable EQA system has become particularly useful in the era of globalisation to validate domestic HEIs to support cross-border activities, student mobility, joint-degree programmes, validation of professional qualifications (Altbach et al., 2009; Stensaker and Maassen, 2015). The mechanisms of policy convergence including the role of international organisations (IOs) and other type of transnational actors in setting global/regional policy agenda, as discussed earlier, is particularly important in the case of EQA. For example, the Bologna Process, a mechanism to promote intergovernmental cooperation between 48 European countries in the field of HE since 1999, gave new impetus to the development of EQA agencies in Europe (Asderaki, 2009; European Commission, 2020). These countries have reconstructed their HE systems to bring about a greater degree of convergence, and European Standards and Guidelines (ESG), regional standards on EQA, have been developed (Stensaker, 2018a). Needless to say, this influences national policy-making. Following the previously quoted Dale's (1999) categorisation of mechanisms that allow

IOs and external actors to frame and influence national education policies, the Bologna Process seems to fall into *harmonization* where a set of countries mutually agree on the implementation of common policies in a certain policy area (Verger et al., 2018).

Cross-border policy networks continue to play important roles in policy diffusion. 20 years after the launch of the Bologna Process, the *Global Convention on the Recognition of Qualifications concerning Higher Education* was adopted in 2019 by the 40th session of UNESCO General Conference, making it the first UN treaty on HE with a global scope. The Convention is designed to facilitate international mobility, as well as cross-border communication and cooperation regarding recognition of qualifications and comparable EQA mechanisms (UNESCO, 2019b). This would give renewed impetus for convergence of EQA system around the world. Other influential global policy documents referring to EQA in HE as an important area to promote include *Education 2030 Incheon Declaration and Framework for Action for the Implementation of Sustainable Development Goal 4* and *the World Bank Group Education Strategy 2020* (The World Bank, 2011, p. 58).

There are also numerous international/regional EQA networks that have been promoting EQA in HE and facilitating coherent EQA framework in the region, which is likely to influence *harmonization.* Table 5 lists key organisations according to the year of establishment, which seems to indicate the timeline of the diffusion. The worldwide association, International Network for Quality Assurance Agencies in Higher Education (INQAAHE), was established in 1991 followed by the regional organisations in the 2000s starting with Europe. It is still growing rapidly: according to the INQAAHE website, it has more than 300 members of EQA agencies as of July 2020, while the number was 178 when the website was accessed in January 2014. The NAAC in India is a member of INQAAHE as well as Asia-Pacific Quality Network.

Table 5: List of international and regional quality assurance network

Acronym	Full Name	Description	Established
INQAAHE	International Network for Quality Assurance Agencies in Higher Education	A world-wide association of over 300 organisations active in the theory and practice of quality assurance in higher education http://www.inqaahe.org	1991
ENQA	European Association for Quality Assurance in Higher Education	Regional network of quality assurance in higher education in Europe http://www.enqa.eu	2000

APQN	Asia-Pacific Quality Network	Regional network of quality assurance in higher education in Asia Pacific http://www.apqn.org	2003
RIACES	La Red Iberoamericana para la Acreditación de la Calidad de la Educación Superior	Regional network of quality assurance in higher education in Latin America https://www.cned.cl/riaces	2003
CANQATE	Caribbean Area Network for Quality Assurance in Tertiary Education	Regional network of quality assurance in higher education in the Caribbean http://www.canqate.org	2004
ANQAHE	Arab Network for Quality Assurance in Higher Education	Regional network of quality assurance in higher education in Arab http://www.anqahe.org	2007
AfriQAN	African Quality Assurance Network	Regional network of quality assurance in higher education in Africa http://afriqan.aau.org	2007

Source: researcher's compilation

This section indicates that there is near universal agreement that the quality of HE must be assured in the era of globalisation with increased international mobility, for which comparable EQA system plays a crucial role (Altbach et al., 2009). It also suggests that, while EQA exercises remain largely within national education systems, transnational policy movements influence national policy-making. Although cross-border intelligibility can be very useful in this policy area, risks and challenges of policy convergence are also expressed. They include the difficulty of defining quality applicable to diversified HEIs, concern for institutional autonomy, national culture, and the importance of relevance to local contexts (Altbach et al., 2009; ENQA, 2007). This section ends with an important question regarding the policy convergence of EQA:

> One very important question moving forward is whether this integration will lead to the dominance of a "Northern" model for quality assurance that disregards the diverse conditions of higher education worldwide (Altbach et al., 2009, p. 65).

3.4.4 EQA mechanisms

This section reviews the basic components of EQA systems. While the processes used in any EQA system depend on a number of dimensions, this section reviews six basic choices of EQA systems found in the literature that are particularly relevant to this study. These are: (i) the force controlling HE (HE Control); (ii) the primary aims and objectives of the EQA (Purposes); (iii) the domains covered by the QA procedures (Scope); (iv) the main approaches of EQA (Approaches); (v) the criteria used in EQA (Criteria); and (vi) the utilisation of the information from EQA (Uses).

(i) HE Control

While the earlier analysis of HE governance offers broad accounts of changing state–university relationships and rise of the regulatory state, this part looks at HE governance and EQA. There are different approaches to coordinating and controlling behaviour of HEIs and EQA is one of the instruments. Clark (1983) identifies three coordinating powers in HE: state authority, professional authority, and the influence of the market, which work in constant tension. They assume different loci of control or authority over the regulation of academic quality in HE. Professional self-regulation assumes academics themselves are responsible for defining and enforcing the rules and norms governing academic quality. State regulation of academic quality assumes that the state's authority and direct control would be primary in defining and enforcing academic quality regulations. Market regulation assumes that the free market choices of the consumers would ensure competition and the quality of education (Dill, 2003). It is important to acknowledge that professionals, the state, and market powers are not necessarily independent or exclusive and that the degree of influence of professional authority, as well as market forces, is substantially influenced by state policy (Dill, 2003, p.2). The amount of professional authority and market influence are largely determined by state policies such as granting authority and deregulation of the market.

Each coordinating power uses different instruments for assuring standards (IIEP, 2006). Table 6 outlines policy instruments for QA in two major HE functions: research and teaching/ learning. It suggests that the dominant forces in HE determine the set of QA instruments suitable for the context (Dill, 2003).

Table 6: Policy instruments for assuring academic standards

	Focus of HE functions	
	Research aspect	Teaching /Learning aspect
Professional (self) regulation	Professional Peer Judgements	Professional Disciplines/ Organisations External Examining Systems Voluntary Accreditation
State Regulation	Research Assessments	Assessment Regulations Academic Audits Subject Assessments Performance-based Funding National Examinations State Accreditation
Market Regulation	Competitive Allocation of Research Funding by State	Student-based Funding and Tuition Fees Information Provision

Source: (Dill, 2003, p. 5)

Interestingly, according to Harvey and Newton (2004), EQA is promoted in all of the above three contexts for different rationales: accountability is the price of increased autonomy in countries with traditionally strong state control, while growing demand for accountability from external stakeholders is observed in countries with strong academic authority or market mechanism. However, national authorities have been a key actor promoting EQA in many countries (except for the USA) (Stensaker, 2018a). The NCTE-NAAC accreditation also primarily falls in the category of state regulation, but it has some aspect of market control through the use of market-oriented strategies such as publicising the accreditation results to the public as well as academics authorities by engaging academics in the assessment.

(ii) Purposes

Information from this section is used as reference in Section 6.3 when examining the objective of the NCTE-NAAC accreditation. The purposes of EQA in HE have been extensively discussed since the 1990s where *Accountability* and *improvement* have been considered two major purposes (Harvey and Newton, 2004; Middlehurst and Woodhouse, 1995; Stensaker, 2018a; Thune, 1996). *Accountability* is defined as rendering an account of what the HEI is doing in relation to the set goals or legitimate expectations that government or society have, in terms that can be understood by those who have a need or right to the account (Middlehurst and Woodhouse, 1995). On the other hand, many scholars advocate shifting the emphasis to *improvement* (Houston, 2008) which aims to promote future performance and continuous quality enhancement rather than making judgements on past performance (Kis, 2005). The choice is often linked to governmental approaches, the level of trust and autonomy in the HE sector (Stensaker and Maassen, 2015).

The relationship between these two major purposes has been a topic of investigation, but diverse positions exist. Some argue that the two purposes are incompatible (Vroeijenstijn, 1995a). The main argument is that if *accountability* is the aim, HEIs are motivated to hide weakness in the EQA assessment, which prevents openness essential for *improvement* (Middlehurst and Woodhouse, 1995; Woodhouse, 1999). Others argue that two purposes can be combined (Thune, 2006). For example, some empirical research in Nordic countries studying EQA agencies indicate that two purposes can be combined in a balanced strategy when key elements such as professionalism, openness, trust and involvement of stakeholders exist (Danø and Stensaker, 2007; Thune, 1996). Others claim that the two purposes are closely linked and are difficult to addressed

separately, as *accountability* agencies are tending to take on an advisory role for *improvement* (Middlehurst and Woodhouse, 1995).

The majority of studies on existing EQA agencies concludes that the purpose is heavily weighted in favour of *accountability*, while *improvement* usually is a distant second (Newton, 2010; Stensaker, 2018a). This is not surprising as the political initiative driving EQA is to respond to the increasing demand for accountability (Harvey & Newton, 2004b). However, as accountability agencies tend to be advisory, many EQA agencies end up with dual purposes. Balancing the two roles is difficult, and the literature suggests that many EQA agencies are not good for *improvement*, especially when they have a strong accountability brief (Harvey & Williams, 2010).

Several additional purposes have also been suggested, although less frequently. The IIEP document adds *quality control* as a third purpose (Martin and Stella, 2007). Harvey and Newton (2004) add *control* and *compliance*: while *control* purpose aims to address the comparability of standards to ensure the status, standing and legitimacy of HE, *compliance* seeks to encourage acquiescence to government policies and preferences. In the HE discourses with a strong emphasis on outcome measurement and comparability, *control* and *compliance* seem particularly relevant.

(iii) Scope

Another basic but more pragmatic choice for an EQA system is what it covers. The scope of EQA systems varies according to the context, objective, legal and political situations. The EQA system may target all HEIs in a country or some segments only. The segments could be public HEIs, private HEIs, universities, non-university HEIs, or combination of these. Different methodologies may be required for different groups, because, for example, universities and non-university HE may accord different weight to research (IIEP, 2006). The NCTE-NAAC accreditation targets a segment of HE sector, degree-level TE only.

Another decision of scope is the unit of analysis: typically, institution or programme. Institutional EQA may be suitable when quality varies widely between institutions and poorly managed institutions exist in the sector. Programmatic EQA focuses on individual degree granting programmes, which typically prepares students for specific professions such as medical doctors, lawyers and teachers. The crucial aspect of programmatic EQA is the assessment of the programme in relation to the professional requirements and expectations for entry into a specific profession (IIEP, 2006; Lenn, 2004). The NCTE-

NAAC accreditation is specific to TE though the NAAC also conducts institutional accreditation.

The EQA system also needs to choose which aspects of HEI functions it covers, such as research, teaching/learning, institutional management or a combination of them. Many EQA systems focus on teaching/learning and some part of governance while research traditionally has its own peer-review QA method (Kis, 2005).

There are also compulsory and voluntary EQA systems. Compulsory systems require all institutions/programmes to periodically undergo the EQA process. It is a strong control mechanism and may have negative consequences if institutions fail to comply. This is usually set up by State authority to assure minimum standards for all institutions or programmes, or types of programmes where the State has a special responsibility, such as teacher training, medicine, and civil engineering. A voluntary system is different: it works well only when there are strong incentives for institutions to apply for the EQA process, such as special status that gives them an advantage in a competitive environment, in which to find students or funding (IIEP, 2006).

(iv) Approaches

EQA systems vary in their form and the key approaches of EQA include accreditation, audit, assessment and licensing (Stensaker, 2018a), which is explained below.

Accreditation – which is the process of evaluating the quality of an HEI or programme, in order to formally recognise it as having met certain predetermined criteria or standards of the acceptable level (Grünberg & Pârlea, 2007, p.25). This is the most prevalent approach and the one the NAAC adopts. It is further examined in the next section.

Audit – which assesses the quality of internal QA mechanisms and judges the extent to which an institution or programme has an effective system to assure and improve education quality (Grünberg and Pârlea, 2007; IIEP, 2006). This approach generally allows flexibility and is used to support further development of HEIs, but does not lead to the comparability of quality levels or assurance of minimum standards (IIEP, 2006; Stensaker, 2018a).

Assessment – which analyse the output or academic performance of HEI such as what students have learnt as a results of their study (Stensaker, 2018a).

Licencing – which enables a HEI the initial right to admit students. It is normally time-bound and combined with another regular EQA approach (Stensaker, 2018a). In the case of India, the NCTE's recognition and university affiliation function as licencing.

(v) Criteria

Another important choice for EQA is the selection of criteria, which is closely linked with the choice of approach. For example, *accreditation* approach requires common standards to make a comparable judgement of status, while audit checks the universities' internal processes for delivering self-defined standards of each university (Brink, 2010; Haakstad, 2001). The level of standards may be different for voluntary and compulsory EQA but setting standards is practically difficult for compulsory EQA as they should not be too low to be meaningful assessment or too high and disrupt education system (IIEP, 2006). It is important that the EQA framework and standards are public and transparent (IIEP, 2006; INQAAHE, 2006), but in practice, not many are regarded so (Harvey, 2004). Criteria setting is influenced by the growing emphasis on the outcomes. It is argued that learning outcomes should be used as the standards for assessing HEIs, and traditional EQA has been criticised for paying attention to the less important aspects of HE and (Stensaker, 2018b). In this context, some EQA agencies have started to adopt outcome assessment in their criteria (Ewell, 2010; Harvey and Newton, 2004; Horsburgh, 1999), which may lead to less attention to teaching quality (Altbach et al., 2009). However, how the outcome agenda will change EQA is still an open issue (Stensaker, 2018b).

Who sets criteria is also important. Criteria may be formulated by a government body, an EQA agency, an expert group, a professional body, HEIs, or jointly by diverse stakeholders depending on the context (ENQA, 2003). The majority of academics regard state-imposed national uniform standards as inimical to a good university system, in protecting institutional autonomy (Brink, 2010). The criteria of the NCTE-NAAC accreditation are examined in Section 6.4.2.

(vi) Uses

The last issue discussed in relation to EQA mechanisms is how the information gathered and generated by EQA processes is used. Information from this section is used in Section 6.3 when examining the objective of the NCTE-NAAC accreditation system. EQA agencies usually produce reports of assessment result on HEI or programme after the review. Reports may be published, shared only with limited stakeholders, or only parts of the report such as accreditation status may be shared with public (Kis, 2005). Lenn

(2004) identifies the government, students, employers, funding organizations and HEIs as primary users of the information and example of uses (Table 7).

Table 7: Uses of accreditation systems for different stakeholders

Users	Use
Government	• To define HE country-wide • To assure quality HE for the citizenry • To assure a quality labour force • To determine which institutions and programmes receive public funding • To accept into civil service only those graduated from accredited institutions • To determine which institutions receive research funding • To generally use quality assurance as a means of consumer protection
Student	• To assist in selecting an institution for study • To ensure transfer between accredited institutions • To ensure admission at the graduate level in a different institution from undergraduate degree • To assist in employment, particularly in civil service and in the professions
Employers	• To assure qualified employees
Funding Organisations	• To determine eligible institutions
Institutions of Higher Education	• To improve institutional information and data • To enhance institutional planning • To determine membership in certain organisations • To facilitate transfer schemes • To assure a qualified student body

Source: Lenn (2004, p.5)

One important choice is whether formal consequences, either positive or negative, are attached to the EQA assessment results. It is normally the public EQAs that have legal implications such as closure of poor performing institutions and direct funding consequences such as reward for high performing institutions or withholding funds for bad assessment results (El-khawas et al., 1998; Stensaker, 2018a). Although proponents argue that funding would encourage enhancement of quality, the dominant view in academia is sceptical of such a rationale (Harvey and Williams, 2010; Kis, 2005). Some analysts indicate a risk of linkage to funding including: high-stake consequences preventing honest review and encouraging manipulation, the difficulty of establishing an appropriate mechanism of funding due to the difficulty measuring quality, and the creation of a compliance culture (Brennan and Shah, 2000; Harvey, 2002a; Middlehurst and Woodhouse, 1995; Vroeijenstijn, 1995a; Woodhouse, 1999). Private EQA schemes are more related to the acquirement of status and marketing (Stensaker, 2018a). Stensaker (2018a) argues that EQA tends to present the outcomes in less accessible

forms, and thus is facing increasing competition from the popularity of league tables which give results in simplistic ways.

Concluding remarks

In sum, the discussed six dimensions of basic choices of EQA systems and the key elements are presented in Figure 5.

External Quality Assurance Mechanisms			
(i) HE Control	State / Professional Authority / Market		
(ii) Purpose	Accountability / Control / Compliance / Improvement		
(iii) Scope	Institution / Programme		
	All HEIs / Segment of HEIs		
	Mandatory / Voluntary		
(iv) Approach	Quality Audit / Accreditation / Assessment		
(v) Criteria	Fitness for Purpose (self-defined) / Externally set Standards		
(vi) User	Government / Students / Employers / Funding Organisations / HEIs		

Figure 5: Key dimensions of EQA

Although the six dimensions were discussed separately, the consistency of choice across different dimensions is crucial. For instance, if an EQA system is established for improvement purposes, choices such as approach, criteria, and use need to be conducive to strengthening conditions and motivations towards future improvement. Moreover, when a new EQA system is established, the complementarity and good alignment with existing governance systems should be ensured. This is important as policies are located in interrelated policies (Ball, 1993).

3.4.5 Accreditation

This section further discusses one of the EQA approaches, accreditation. As mentioned earlier, the terms QA/EQA and accreditation are sometimes used interchangeably reflecting its dominant status (Schindler et al., 2015). The NAAC also employs this approach.

Rise of accreditation

With the rise of EQA, the accreditation approach, in particular, has emerged as a strong global trend (Harvey and Williams, 2010; Westerheijden, 2001). Danø and Stensaker

(2007) call it the 'age of accreditation'. Accreditation is defined as follows in the UNESCO glossary:

> The process by which a (non) governmental or private body evaluates the quality of a higher education institution as a whole or of a specific educational programme in order to formally recognize it as having met certain predetermined minimal criteria or standards. The result of this process is usually the awarding of a status (a yes/no decision), of recognition, and sometimes of a license to operate within a time-limited validity (Grünberg and Pârlea, 2007, p.25).

Unlike other EQA approaches, accreditation clearly generates comparable results based on common standards, which responds to the accountability demand. It needs to be noted that accreditation approach is not particularly promoted as a form of EQA in many policy documents including the *Bologna Declaration*, the guiding document of the Bologna Process, and the *Global Convention on the Recognition of Qualifications concerning Higher Education.* The INQAAHE guideline for EQA agencies, which is expected to facilitate mutual recognition among EQA agencies in different countries, explicitly state to avoid leading to the dominance of any specific approach and rather aim to promote agreed principles among different approaches (INQAAHE, 2006). However, the convergence towards accreditation with standards set by a national agency seems obvious, both in the Global North and the Global South (Ali et al., 2018; De Vincenzi et al., 2018; Mussawy and Rossman, 2018). Many countries choose accreditation instead of, or on top of, existing QA arrangements due to the move towards cross-national harmonisation which requires comparability and standards (Danø and Stensaker, 2007; Stensaker, 2018a).

Despite its popularity among policy makers, a significant portion of the literature has been fiercely critical of accreditation from an early stage, mirroring the critiques towards QM and EQA (Faber and Huisman, 2003; Haakstad, 2001; Westerheijden, 2001). Scheele (2004) calls accreditation a 'License to Kill'. Their arguments include concerns over the static concept of quality applied to diverse HEIs (Haakstad, 2001), and accreditation as unnecessarily cumbersome and controlling (Faber and Huisman, 2003).

Accreditation procedures

The basic structure for accreditation procedure is similar globally, and is comprised of the following three key steps: i) self-evaluation, ii) peer review , and iii) decision-making and public reporting, if appropriate (Grünberg and Pârlea, 2007; Harvey and Williams, 2010; IIEP, 2006). This part reviews self-evaluation and peer-review. Information from

this section is used in Section 6.4.1 when examining the procedures of the NCTE-NAAC accreditation system.

A self-evaluation process is conducted by institutions resulting in a report referring to the set of standards and criteria of the accrediting body (Grünberg and Pârlea, 2007). The literature argues that giving strong emphasis on self-review is crucial because it encourages self-reflection and ownership of the process leading to sustainable development, rather than making it merely as a source of information for external stakeholders (Harvey, 2002b; Thune, 1996). However, Harvey and Newton (2004) also point out that the claimed effects of self-evaluation is based on accumulated anecdotal evidence rather than systematic empirical research. Some concerns are also raised: the risk of window-dressing has been repeatedly mentioned particularly when the accreditation is compulsory and the stakes are high, for HEIs have a strong motivation to hide weakness in order to attempt to influence external judgments rather than conducting honest and critical self-assessment (Kis, 2005; Kemenade and Hardjono, 2010). Another concern is the absence of adequate conditions. In the context where culture and experience of evaluation is insufficient, self-evaluation become uncritical (IIEP, 2006).

Peer review is a study visit conducted by a team of peers selected by the accrediting organisation which reviews claims in self-evaluation report and produces an assessment report (Grünberg and Pârlea, 2007). Peer-review members are usually academics in the same discipline, and sometimes administrative peers, external to the reviewed programme or institution (IIEP, 2006). The main argument in support of peer-review is that academics are more likely to be open to their peers as they have the same level of understanding of the discipline, which makes the review effective (Finch, 1997; Vroeijenstijn, 1995b). Langfeldt et al. (2009) argue that peer review balances the predefined, rule-followed bureaucratic nature of standard-based accreditation towards excellence and diversity. Brennan (1997, cited in Kis, 2005), on the other hand, expresses concerns as it can raise questions of legitimacy for those outside of HE, as peers are 'colleagues' or 'competitors' and obtaining both expertise and disinterestedness may be a challenge.

Similarity of procedures and transferability
Striking similarities are found in the methods and procedures adopted by EQA agencies around the world regardless of their purposes or context (Harvey and Williams, 2010). This seems to be partly driven by the desire for mutual recognition of EQA agencies, as

it naturally encourages newly established EQA agencies to follow established agencies or guidelines issued by international QA networks (Harvey, 2004). These political preferences seem to shape the trend of EQA rather than technical preferences (Skolnik, 2010).

The striking similarities raise concerns, which may be summarised as excessive similarity and transferability. Like many GEPs, these dominant methods adopted by EQA agencies around the world are based on the conceptions of EQA that originated in Europe and the USA (Harvey and Williams, 2010). This raises the concern over transferability, especially in less developed countries where the contexts are significantly different. The theme of cross-national influence and transferability recurs in the literature, which reports varying degree of success experienced by those countries in adopting "good practice" imported from more developed systems (Bazargan, 2007; Billing and Thomas, 2000; Nguyen et al., 2009). Despite some reporting positive outcomes such as promoting 'quality culture' (Rozsnyai, 2004), many of them warn against attempting to fit of generic models to the local environment. They report cultural, structural, political and technical problems in transferability such as different scale of HE sector or absence of the condition required to successfully implement EQA such as a pool of human resource, absence of a culture of quality management, lack of peer review experience, insufficient funding (Bazargan, 2007; Billing and Thomas, 2000; Bordia, 2001; Houston and Maniku, 2005). Less developed countries not only face the pressure to assure quality, but must also develop the conditions required for quality monitoring. Lim (2001) concludes that EQA can be useful for developing countries, but it must be modified to suit the conditions prevailing in those countries. This suggestion, however, may be idealistic under the global political pressure towards comparable EQA as discussed earlier in the chapter.

3.4.6 Teacher education and quality assurance

The NCTE-NAAC accreditation is EQA of initial teacher education (ITE), which is a part of HE in India. Although there is no doubt that the above-discussed trends in HE influence TE, it is important to examine EQA in the context of TE and review peculiarities. Thus, this section examines EQA in TE as a part of efforts to assure quality of teachers.

By the late 1990s, an apparent consensus had emerged that effective teachers are the most significant factor that is open to policy influence in increasing students' learning achievement (Eide et al., 2004; Santiago, 2002; Schacter & Thum, 2004). In this backdrop, many countries have paid increasing attention to developing effective

mechanisms for assessing and ensuring the quality of teachers and TE (Ingvarson et al., 2013a).

Globalisation and neoliberal framing of teacher policy

Like the discussion of GEP, globalisation affects teacher policy including TE policy. Robertson (2012) convincingly shows how symbolic control over teacher policy, which was dominated by national actors until the 1990s, has been shifted to the international arena. The teacher policy-making space seems to be populated with international organisations, consultancy firms, social enterprises, and philanthropies, who are keen to frame "good teachers" for reasons such as creating efficient education system, competition in knowledge economies and managing a crisis in the teaching profession. Like other GEPs, new initiatives of these global organisations often frame teaching with neoliberal policy mix such as choice, performativity, assessment, accountability, private sector participation, and incentives (Robertson, 2012; Sayed and Sarangapani, 2020). This shift of policy-making space and neoliberal policy framing of teaching has profound implications on contemporary teacher policies including TE policies in many countries.

Broad policy set to assure quality of teachers

It is important to understand the wider debate to ensure the quality of teachers, as EQA of TE constitutes a part of such broader efforts. There are different stages in teachers' professional life, for which different mechanism to regulate quality can be set. Ingvarson (2002) suggests a series of indicative standards and QA mechanisms along a continuum that runs from entry and pre-service education, induction, to professional development (Table 8). It demonstrates a need to treat a sequence of QA arrangement and development measures as a set of interrelated practices and policies that functions as a whole to assure and improve the quality of teachers. According to the study of Bills et al. (2008) on the country systems that produce high quality teachers, there are a variety of effective models instead of a single one in terms of points for assessment, methods and contents for QA. Different systems may choose to place emphasis at different stages according to their ideology and history (Ingvarson, 2002).

Table 8: A Map of professional standards and quality assurance functions

	Phase 1 Pre-service preparation	Phase 2 Induction	Phase 3 Continuing professional development
Standards relevant to each phase	Selection standards	Registration standards	Accountability standards

	Qualification standards Accreditation standards	Permanency standards	Registration standards (renewal) Appraisal standards for professional development Advanced certification standards Promotion standards
Relevant QA Mechanisms	State legislation/registration requirements **Accreditation (of pre-service education institutions)**	Registration of new teachers	Advanced certification Registration renewal

Source: Adapted from Ingvarson (2002, p. 6)

Table 8 can be largely divided into two: (i) sets of standards and QA mechanisms for individual teachers at different career stages and (ii) EQA for TE institutions/ programmes. For both categories, QA mechanisms through measurement against set standards have been promoted. In the discourse that increasingly values outcomes and efficiency as discussed earlier, teacher performance has been reconceptualised as what needs to be defined and measured, relying on a system of performance benchmarks and assessments (Ball, 2003; Robertson, 2012), which led to the 'normalization of the marketized teacher, the managed teacher, and the performative teacher' (Holloway and Brass, 2018, p. 361). Similarly, EQA for TE programmes/ institutions with external regulation and accreditation of TE programmes based on outcome measures have been promoted (Ingvarson et al., 2013b).

Discussions similar to the critique on outcome measurement and the difficulty of defining education quality are observed in the literature on teachers, though not so much discussion was found on EQA of ITE. In order to respond to accountability regime, teaching is regarded as calculable, measurable, evaluable, and comparable (Holloway and Brass, 2018) whereby reductionism and managerialism may ignore what cannot be measured even though it might be important in the educational process (Forde et al., 2006). These measurement systems also provide the metrics against which teachers can monitor and measure themselves and organise themselves to standardised targets, indicators and evaluations (Ball, 2015a, 2003; Holloway and Brass, 2018). These mechanisms enable what Ball (2003) refers to as the technology of performativity, a new mode of state regulation (Holloway and Brass, 2018).

EQA of initial teacher education

This part further investigates EQA for ITE programmes and institutions. With increasing accountability demand and recognition of the importance of teachers, governments are increasingly looking for effective ways to ensure high quality ITE (Ingvarson et al., 2013b; OECD, 2011). Similarly, increasing attention to EQA of ITE providers and programmes is observed in international TE policy documents (Eurydice, 2006; OECD, 2005; UNESCO, 2019a). For example, the joint ILO-UNESCO committee of experts on teachers states in its report regarding TE providers that 'a system for the assessment and accreditation of such institutions is necessary in order to ensure the quality of training provided' (ILO & UNESCO, 2012, p.8). However, the same report finds a lack of such system in many countries and states '[t]his could have negative consequences on the relevance of pre- and in-service teacher training' (p.225). Though it may be rare, there are already some EQA agencies specifically created for TE programmes or providers including Council for the Accreditation of Educator Preparation (CAEP) in USA and Australian Institute for Teaching and School Leadership (AITSL).

Assessment of quality of TE in EQA

While issues in defining and measuring the quality of education and teaching discussed repeatedly in this chapter generally applies to assessing TE, this part further discusses key literature in relation to measuring the quality of ITE for EQA. However, ITE varies significantly across countries and it is beyond the scope of this study to extensively examine the literature on the quality of TE or draw generalised conclusions. Information from this section is used when analysing the criteria of the NCTE-NAAC accreditation in Section 6.4.2

As already discussed, programmatic EQA focuses on individual degree granting programmes, in this case, TE, which typically prepares students for specific professions and therefore it is critical that EQA assessment reflects the professional requirements and expectations for entry into a specific profession (IIEP, 2006; Lenn, 2004). The articulation of such professional requirements and expectations of teachers in the form of standards of what teachers are expected to know and be able to do has been a key strategy in many countries since the 1990s in the unprecedented attention to teacher quality and accountability (Clarke and Moore, 2013; ILO and UNESCO, 2012; Ryan and Bourke, 2013; Storey, 2006). It should also be noted that concerns have been raised including the moves towards codification of teachers' work in sanitised forms, which may be used to encourage compliance of teachers to align with regulations (Clarke and Moore, 2013; Dunn, 2005; Sachs, 2003). It is similar to the previously reviewed critiques, and

they all seem to stem from the standards and accountability movement in education bringing mismatch of the reductionist and managerialist approach in education.

The expected qualities of teachers are often framed as knowledge, skills, and dispositions (Darling-Hammond, 2012; Ingvarson, 2002; Mandinach and Gummer, 2016). Similarly, most standards frameworks contain similar elements including these three domains, and the standards framework suggested by the Commonwealth may provide an idea as of what they often contain (Gallie and Keevy, 2014). There are five categories: (i) professional knowledge; (ii) professional skills and practice; (iii) professional ethics, values and attitudes; (iv) professional leadership, community and relationships; and (v) professional learning. These standards can guide various teacher policies including the accreditation of programmes, ITE programme design, programme admission and graduation, licensing of teachers, teacher learning and recognition (Darling-Hammond, 2017; Ingvarson, 2002; OECD, 2011). In fact, teacher standards have been used for EQA of ITE. For example, standards for licensing beginning teachers developed by Interstate New Teacher Assessment and Support Consortium (INTASC), a consortium of state education agencies and HEIs in the USA, were incorporated into the TE accreditation standards of the National Council for the Accreditation of Teacher Education (now the Council for Accreditation of Educator Preparation, CAEP) (Darling-Hammond, 2016). Similarly, the *Australian Graduate Teacher Standards* detailing the knowledge, skills and attitudes expected of teachers is referred to in the national accreditation system for TE (AITSL, 2011). Since those responsible for teacher preparation programmes should be accountable for ensuring that graduates meet the professional standards required by governments, articulated requirements and expectations of teachers are crucial reference points for EQA of ITE.

Another important knowledge set to inform the assessment of EQA of ITE is about creating stronger and more effective TE programmes that fit the current context. As ITE varies significantly across countries and what count as good ITE programme cannot be generalised, this part only notes some trends and examples found in the literature. Cochran-Smith et al. (2016) chart the contemporary landscape of research on teacher preparation based on a review of more than 1,500 studies published between 2000 and 2012. They found three trends: unprecedented attention to teacher quality and accountability; changing conceptions of how people learn and what they need to know to thrive in a knowledge society; and increasingly diverse student populations coupled with growing social and school inequality. These trends no doubt affect expectations of TEIs. A few examples of research areas responding to these trends are: testing and

assessment of teachers and TE programmes; improving schools and teaching for the 21st century; expanding the fieldwork component to place clinical practice at the centre of teacher preparation; preparing teachers to teach students of diverse backgrounds (Cochran-Smith et al., 2016).

As an example of more concrete suggestion for an effective ITE, Darling-Hammond (2006) argues that three critical components: tight coherence and integration among courses and between course work and teaching practicum in schools; extensive and intensely supervised field work integrated with course work using pedagogies linking theory and practice; and closer, proactive relationships with schools that serve diverse learners effectively and develop and model good teaching. This apparent emphasis on teaching practicum needs to be located in the context of the USA where reform efforts have focused on expanding the field work component of TE to the extent that a high-profile report by a Blue Ribbon Panel commissioned by the National Council for Accreditation of Teacher Education, called for placing clinical practice at the centre of teacher preparation (Cochran-Smith et al., 2016; NCATE, 2010).

This section reviewed QA in TE. It seems apparent that the discussion in this section is framed within a larger discussion of HE accountability, coupled with the shift to the outcome-focused assessment in education. To conclude the review of EQA literature, the status and key issues in terms of EQA literature is discussed in the next section.

3.4.7 On EQA literature

To conclude the review of EQA, this section notes several important points that emerged through the literature review. The first of such point is the critique of its weak theoretical base. Despite its global popularity among policymakers, the overall tenor of the academic literature on EQA has been critical from an early stage, considering managerialism and reductionism as a poor-fit for education (Faber and Huisman, 2003; Haakstad, 2001; Westerheijden, 2001). Understandably, the arguments mirror the critique on the approach to QM, as this provides the foundation of EQA. Fundamental difficulties discussed in this chapter such as defining quality in HE and the use of composite indicators to compare performance of HEIs debated since the 90s have not yet settled. Law (2010) concludes that EQA, TQM and PIs can all be criticised as lacking in rigorous theoretical foundations. In other words, globally popular EQA systems may be operationalised based on weak theoretical base.

Another important point is the limited empirical literature despite the global use of EQA. While many assumptions are made on the effects of EQA, it has been repeatedly pointed out that empirical research is limited, creating a mismatch between the rhetoric and reality (Banta, 2010; Cartwright, 2007; Ewell, 2010; Lillis, 2012; Stensaker, 2018b; Stensaker et al., 2011). Possibly as a response to the need, my review found a somewhat improved situation in the last decade. However, much of the empirical studies on EQA found in the review are similar in focus and methodology, that is, qualitative case studies or self-studies of a particular institution(s) or programme(s), on how implementation of EQA affected HEIs, based on interview, observation and document analysis. Stensaker (2018a) identifies three dimensions as key effects of EQA on HEIs: internal power shifts from lower to higher levels for HEIs to respond to the accountability demand; emphasis on professionalisation and academic leadership which sometimes results in transforming such practices into more rules and procedures; and systematic involvement of stakeholders. Some exemplar studies are introduced here. A study of De Vincenzi et al (2018) on the perception of EQA in three universities in Argentina finds a higher degree of empowerment of institutional authorities regarding teaching management and greater attention paid to teaching modes. Wahlen (2004) analyses the impact of EQA systems in Swedish HE and finds that quality audits have resulted in the development of policy and structure of QM, while the cultural change was modest, and the subsequently introduced programme assessment contributes to more effective, but perhaps more standardised QA work.

There are also studies on EQA specific to TE. For instance, Kornfield et al.'s (2007) study of their own TEI in California found that despite the practitioners' initial objections to the policy as prescriptive, atomised, and likely to deskill educators rather than increase professionalism, they increasingly adopted the technocratic language of compliance. Bell and Young (2011) in their study on the responses of five TE institutions in Connecticut found actual changes such as the development of new assessment of teacher candidates and development of data systems, along with symbolic change complying on the surface, but not fundamentally altering practice. While there are insightful studies as these that show the complexity at practice level, Cochran-Smith et al., note on the research on EQA in TE that many studies present superficial accounts according to the respondents and conclude that this area of study is 'extremely uneven in quality and value' (2016, p. 462).

A few studies on the NAAC, EQA agency in India, have also been found. Stella (2002, 2004) researched the impact of the NAAC processes through questionnaires completed

by 100 accredited institutions and report positive impacts in all aspects of their functioning: i.e. pedagogical, managerial and administrative while some negative results were also reported including unnecessary standardisation that decreases diversity and creating the semblance of quality to gain good assessment results. The second study using a survey with 100 principals of accredited institutions in the seven north-eastern states reports positive impacts in all areas similar to the first study (Pillai and Srinivas, 2006).

Although these studies provide important insights into the complex responses to EQA and standards application, there are a much smaller number of empirical studies on the larger influences, discourse patterns, and development of major EQA policies at the state, country, or supranational level, especially for TE (Cochran-Smith et al., 2016). My study falls into this category. As an exemplar of this type of study, Brennan and Willis (2008) analysed Australian teacher education policy in terms of its governance in multiple arenas, and illustrated that contemporary TE in Australia was a field of contestation played out in the overall university context, in state–federal tensions related to national accreditation and federal budget issues. There are also other studies which refer to EQA in examining the content and discourse of TE policies, for example, influences on teacher education policy debates and discourse patterns of policy documents and tools (Cochran-Smith and Fries, 2001; Freeman et al., 2014). This type of study on EQA in India was not found in my literature search.

In conclusion, EQA literature still needs to strengthen its theoretical foundation as well as empirical research. Given the global popularity of EQA, it is important to address these gaps and establish a stronger knowledge base.

3.5   Studying policy in the era of globalisation

Another important body of knowledge for the study is about policy studies. Thus, policy and policy studies are discussed to clarify my approach to policy studies (3.5.1), followed by the discussion on my position in researching GEP (3.5.2).

3.5.1   Policy and policy studies

Policy as discourse

Policy is an important facet of social structure. Policy can be understood as a set of rules, often supported by resources, that attempts to constrain or channel behaviour in particular directions over time and across space through regulative, normative, or

cognitive means (Anagnostopoulos and Rutledge, 2007; Coburn, 2004; Scott, 2008). Public policies are of particular importance. Mintrom (2011, p. 1) defines public policies as 'the choices that governments make on behalf of citizens living in their jurisdictions. These choices are codified in the rules, plans, principles, and strategies that guide government action'.

Policy studies are a highly contested and interdisciplinary area of study, and there are various approaches to its study. The 'rational' model dominated much of the 20th century due to its perceived generalisability and objectivity. It assumes that policy-making is a logical, objective, linear, and top-down process wherein unbiased decision makers choose from among alternative strategies. However, in the 1970s critical policy research emerged and rejected the rational model's view of policy as a neutral and technocratic process with little attention to particular values of people or context. The critical approach understands policy-making as a social phenomenon and policy as a product of political contestation, negotiation and compromise within unequal power relations and differing interests (Blackmore, 2011; Cochran-Smith et al., 2013). Many theorists in this tradition approach policy as *discourse* (Bacchi, 1999; Ball, 1993, 1990; Cochran-Smith et al., 2013). My theoretical approach is located within this critical and sociological tradition, particularly discourse approaches to policy analysis.

While different notions of discourse within different theoretical traditions exist, in the critical theory tradition, the discourse informed by a Foucauldian view is 'an ensemble of phenomena in and through which social production of meaning takes place' (Olssen et al., 2004, p.67). Thus, the *policy-as-discourse* approach to policy studies widens focus beyond the content and language of policy texts and illuminates material social practices and power relations involved in framing the text through meaning-making processes. Taking this approach means acknowledging that policy-making is a messy and interactive process occurring within ongoing struggles over ideas and worldviews among multiple actors and at multiple levels (Ball, 1993; Cochran-Smith et al., 2013). It also allows us to conceptualise policy in a broad way, not simply the purview of the state, but also of many diverse actors and agencies that influence (Cochran-Smith et al., 2013). It is important to emphasise that meaning-making is not a neutral or natural process, where discourses create conditions which make certain things look 'natural' while silencing others, thus opening them to critical analysis. Consequently, it also questions the official definition of policy problem and interrogates the construction of a problem since both problems and solutions are given shape in policy discourse (Bacchi, 1999; Goodwin, 1996; Stone, 2012). Problematising how the problem is framed is critical as it limits

subsequent thoughts and actions (Bacchi, 1999), and it is also important to acknowledge that policy analysis does not stand outside the politics of policy (Cochran-Smith et al., 2013).

This approach necessarily draws attention to the power to make discourse, i.e. 'who can speak, when and with what authority' (Ball, 1990, p.17), and offers a rich conceptual tool to capture power relations of various players, both structure and agency, in policy-making. The relationship between structure and agency in shaping social actions is a perennial sociological question including policy studies (Lall, 2007). Structures are recurrent patterns that can both enable and constrain individual actions (Rigby et al., 2016) while agency can be understood as 'an actor's ability to have some effect on the social world' (Scott, 2008, p. 77). Paying attention to the relation between them is important as it may shape studies: scholars who draw on structural accounts tend to explain action as constrained by economic, political, and social contexts through focusing micro issues such as policies and formal organisational structures, whereas those who draw on agentic accounts look for human motivation and understanding to explain behaviour through micro-level studies (Giddens, 1979; Rigby et al., 2016). In agreement with scholars who recommend analysis based on both structure and agency without giving primary to either (Giddens, 1984), this research aims to examine the accounts of actors, while paying attention to macro influences.

The approach of *policy-as-discourse* regards policy-making as a messy and interactive process, whereas both agency and structure interact in discursive practice in policy-making in a complex way, and the relationship between structure and agency is not static but fluid and dynamic (Ball, 2005; Cochran-Smith et al., 2013). Moreover, agency contributes to discourse production within a space shaped by structures while produced discourses may also become a part of the structure that consequently alter how to constrain or enable behaviours (Ball, 1993; Giddens, 1984). This is a particularly relevant point to explore in policy-making analysis.

Analytical framework to study policy
There have been a number of attempts to provide a useful analytical framework to study policy. For instance though criticised as unrealistically rational and linear, the 'stage model' provides a useful heuristic device for analysis by dividing policymaking into different stages (Jones, 2009). Among scholars regarding *policy as discourse*, there are various suggestions of an analytical framework. Ball (1993) suggests distinguishing 'policy-as-text' and 'policy-as-discourse', as both are valid but different approaches. The

former approach's focus on text is primarily a matter of language in speech and documents, while the latter seeks to attend to the discursive possibilities beyond texts such as meaningful communication, perception, organisational forms and practices (Ball, 2015b). Similarly, Fairclough suggests discourse as text, discursive practice and wider sociocultural practice to analyse policy (Janks, 1997; Rogers et al., 2005).

One seminal work is the *policy cycle* developed by Stephen Ball and his colleagues that rejects a straightforwardly linear and state-centric conception of policy formulation and implementation (Bowe et al., 1992). It is made up of three overlapping contexts of policy. The 'context of influence' is the milieu of ideas and trends where policy discourses are constructed; it has an uneasy relationship with the 'context of policy text production', usually articulated in the language of public good; the 'context of practice' is the arena of practice where practitioners interpret policy (Bowe et al., 1992, p. 19). Ball (1994, p. 26) argues that this approach gives some conceptual structure to the policy trajectory studies which 'employ a cross-sectional rather than a single level analysis by tracing policy formulation, struggle and response from within the state itself through to the various recipients of policy'. The policy cycle calls attention to the struggles involved in policy at various levels, including the local contradictions that emerge as policies are remade and reworked by practitioners. Thus, policy authors cannot control the meaning of the policy texts, and one needs to understand the histories and ideologies of the people who receive and enact them (Ball, 1994; Cochran-Smith et al., 2013). Lingard (1996) asserts that it is a useful development to understand the complexities of the relationships of these three contexts and encourages the examination of specific policies in their contexts. He further suggests that analysis of different contexts may give understanding of the different levels of fidelity for implementation, and that the concept of material policy versus symbolic policy may be useful.

Ball later added two further contexts in apparent recognition of the need for a feedback loop from the context of practice at micro level back to the context of influence at the macro level (Ball, 1994; Lall, 2007). The first is the 'context of outcomes', the impact of policy upon questions of broader struggles for social change, while the second is the 'context of political strategy', which is identifying strategies to tackle inequalities and unmask the working of power (Ball, 1994; Lingard, 1996).

Drawing on the concept of *policy cycle*, Cochran-Smith, Piazza, and Power (2013) developed a framework named *the politics of policy* to understand contemporary TE policies. *The politics of policy* has four aspects which are: (1) discourses and influences,

(2) constructions of the problem of teacher education, (3) policy in practice, and (4) impact and implementation. *Discourses and influences* (1) are macro political and economic conditions, agendas, ideologies, global influences, and trends that frame policy. *Constructions of the problem of teacher education* (2) involve 'the major actors and influencers behind policies, as well as how problems and solutions are framed, stated and hidden agendas, and political strategies used to forward policies' (Cochran-Smith et al., 2013, p. 9). *Policy in practice* (3) is concerned with how policies are interpreted and remade in local contexts, including acceptance and resistance, and (un)intended consequences. And *impact and implementation* (4) refers to the outcomes of policies, particularly in terms of power relations, control, dominant/marginalised discourses and groups, and (dis)empowerment of practitioners (Cochran-Smith et al., 2013).

Table 9 lists aspects of Ball and colleagues' *policy cycle* and Cochran-Smith and colleagues' *politics of policy*. The first four aspects are similar as concepts, though some descriptions of the *politics of policy* seem more articulated. The concept of *context of political strategy* in *the policy cycle* may be understood to be included in *impact and implementation* in *the politics of policy*.

Table 9: Summary of two policy trajectory study framework

The policy cycle (Ball et al.)	The politics of policy (Cochran-Smith et al.)
Context of influence	Discourses and influences
Context of policy text production	Constructions of the problem of teacher education
Context of practice	Policy in practice
Context of outcomes	Impact and implementation
Context of political strategy	

Source: researcher's compilation

These widened and nuanced understandings of policy and policy studies guide my study with cross-sectional analysis rather than linear policy stage analysis. The next section considers researching policy in the era of globalisation.

3.5.2 Researching global education policy

This section is concerned with clarifying the position of this study in researching global education policy (GEP). The nation-specific nature of education sectors has changed and continue to change under globalisation (Robertson and Dale, 2008). As discussed earlier in this chapter, the policy process is no longer limited to state domestic activity. In this context, researching the global in education policy does not simply mean

introducing globalisation as a topic on the research agenda, but raising important theoretical and methodological implications for education policy analysts (Green, 2003; Verger et al., 2018).

In this vein, Robertson (2018, p. 37) argues that the global features in education policy can be understood in somewhat different but inter-related ways such as a 'discourse', 'reach', 'condition of the world', 'project', 'scale', which indicate different methodologies in researching the global in education policy. For example, the global as 'reach' suggests ways of understanding education policies to capture movements from one point of origin through space to be fixed/altered in a new place (Robertson, 2018). Many existing studies on GEP focus on this international reach of the policy process, looking at the transfer of policies across countries (Verger et al., 2018). This study primarily pays attention to the global features as *discourse* in education policies such as global ideas influencing policy-making, which is in line with my approach to *policy-as-discourse*, as explained in the previous section.

It is important to avoid accepting unproblematic assumption of the nationalism and the state, and to take the nation state the focus of all analytic attention (Robertson and Dale, 2008). Similarly, it needs to go beyond the binary accounts of the global as abstract and homogeneous 'outside' that shapes education policy-making on concrete, diverse, and agentic 'local' (Robertson, 2018). Policy-making is not a linear process as already discussed, and instead is 'a complex, uneven and asymmetrical set of multi-layered cross-cutting processes and nodes of interaction' (Cerny, 2001, p. 397). Moreover, processes of globalisation have resulted in the changes in national policy-making space including partial denationalisation of the state, with important implications for questions of citizenship, representation and politics (Sassen, 2008), in which the influence of globalisation may appear in less direct ways. All these require us to study how the 'global' impacts on the 'national' while acknowledging the interdependency of actors and the movement of ideas in framing policies (Ball, 2016b). This study focuses on the national policy-making while being attentive to the complex ways that knowledge processes are being constructed in the era of globalisation.

3.6   Theoretical framework of the study

In this chapter, I have reviewed the key body of knowledge of EQA and accreditation (3.4) and policy and policy studies (3.5). As the key context of the study, globalising education policy (3.2) and shifting HE (3.3) were also reviewed. All these bodies of

knowledge inform my study, which is a study of policy analysis, and the content of analysis is EQA in the context of globalising education policy and changing HE.

In this final section, I synthesise the reviewed body of knowledge as a theoretical framework for the study. A theoretical framework is the intellectual structure which guides one's study, and reflects where one stands intellectually vis-à-vis research questions (Troudi, 2014). First, the focus of this study is explained based on understanding from the literature review (3.6.1). Then the theoretical framework to understand policy is introduced (3.6.2), followed by the presentation of the theoretical framework of this study (3.6.3).

3.6.1 Scope of the study

The focus of this study is the construction and adoption of accreditation policy, paying particular attention to the influencing factors both globally and locally. This section further discusses this focus to locate it in the reviewed literature. First, research shows a global convergence of policy discourses, as earlier discussed in this chapter, but does not provide sufficiently rich empirical evidence of the re-contextualisation and effects of global policy discourses in local places (Verger et al., 2018). However, to understand 'the global' in education policies, the study of the complex relationships between global ideas, and its dissemination and re-contextualisation in local settings becomes crucial (Ball, 1998; Verger et al., 2018). This study is aimed to add an account of the effect of global discourse in local policy-making.

Moreover, according to Cochran-Smith et al.'s (2016) review of more than 1,500 studies on teacher preparation published between 2000 and 2012, most of the empirical studies on teacher preparation explore 'context of practice' (Bowe et al., 1992) examining how practitioners interpret and remake teacher preparation policy including EQA while a small number of studies analyse the larger influences, content and discourse patterns, and development of major policies at the state, country, or supranational level (Cochran-Smith et al., 2016). In the latter category, studies referring to EQA is further limited, and my case study falls in this field of very limited existing research. Among reviewed studies, previously quoted study of Brennan and Willis (2008) appears to have similar approach to my study in the sense that it analyses shifts and changing directions in TE policy from the county and global perspective.

Lastly, this study focuses on policy construction/adoption rather than enactment and implementation. Verger (2014) argues that, while many studies on GEP focus on global

agenda setting or policy enactment, looking at the adoption stage has the potential to add new perspectives in researching GEP. The focus of this study follows what Verger explains:

> Focusing on policy adoption implies paying closer attention to, and producing more empirical research on, the processes, reasons and circumstances that explain how and why policy-makers (or other education stakeholders) select, embrace, and/or borrow global education policies, and aim to implement them in their educational realities (Verger, 2014, p. 14).

This is particularly important as many policy-makers adopt in an apparent voluntary way, as in this study, instead of externally imposed by IOs (Dale, 2005). As a framework, Verger suggests looking at the role of ideas in processes of policy change and policy adoption. This is in line with my focus on discourse in policy-making. Though not a study on GEP, the approach of my study draws on the seminal study of Ball (1990), *Politics and Policy Making in Education,* in which he focused on the processes, reasons and circumstances to explain the production of the 1988 Education Reform Act in England and Wales.

3.6.2   Theoretical framework to understand policy

I have devised a framework for understanding policies, for it is important to establish and justify my understanding of the key concept in the research question by locating it in the related literature (Troudi, 2014). The framework synthesises the previously-introduced ideas of *the policy cycle* (Bowe et al., 1992) and *the politics of policy* (Cochran-Smith et al., 2013). It has four aspects: (i) discourses and influences, (ii) policy construction, (iii) policy in practice, and (iv) impact (see Figure 6). These four aspects commonly appear in *the policy cycle* and *the politics of policy* (see Table 9). 'Context of political strategy' from *the policy cycle* is not included as I regard political strategy is included in every context.
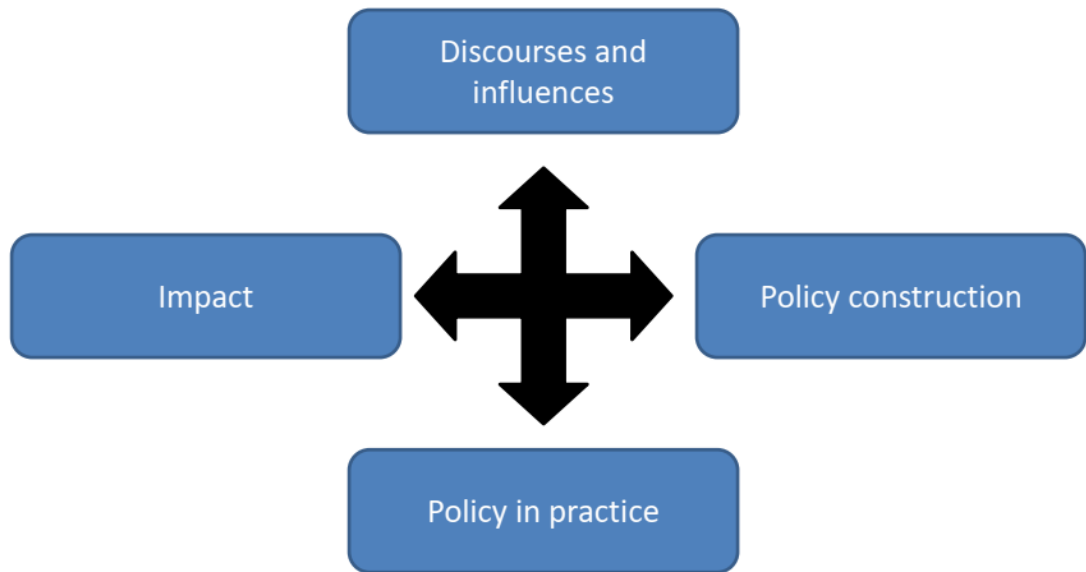
Figure 6: Theoretical framework to understand policy

The definitions of each aspect are subsequently explained, and are akin to the ones of *the politics of policy*, as the boundaries of those different aspects seem to be better articulated by its description. *Discourses and influences* (i) is concerned with international and national macro social, political, economic conditions, ideas and trends that shape policy discourse. *Policy construction* (ii) has to do with policy problem setting and policy text production including political agendas and struggles of actors and influencers. *Policy in practice* (iii) relates to how policies are interpreted and implemented in the actual context of practice, especially in terms of individual and collective response, acceptance and resistance, and (un)intended consequences. Lastly, *impact* (iv) has to do with the outcomes of policies at sociocultural level, particularly in terms of power relations, control, dominant/marginalized discourses and groups, and (dis)empowerment of practitioners. Following the idea of *the policy cycle*, these four aspects do not represent linear and distinct steps but they are cross-sectional in nature, which is expressed as double-headed arrows.

3.6.3 Theoretical framework of the study

Lastly, the theoretical framework of the study is presented. My approach to policy study is located within the critical sociological tradition and takes the *policy-as-discourse* approach. Thus, I reject the notion of value neutrality of policy-making, and this study regards policy-making as a messy and interactive process and attempts to capture power relations of various players, both structure and agency, in policy-making.

The framework to understand policy presented in the previous section guide my data analysis and presentation of findings. My study focuses on the two aspects of policy: (i) discourses and influences and (ii) policy construction (Figure 7).
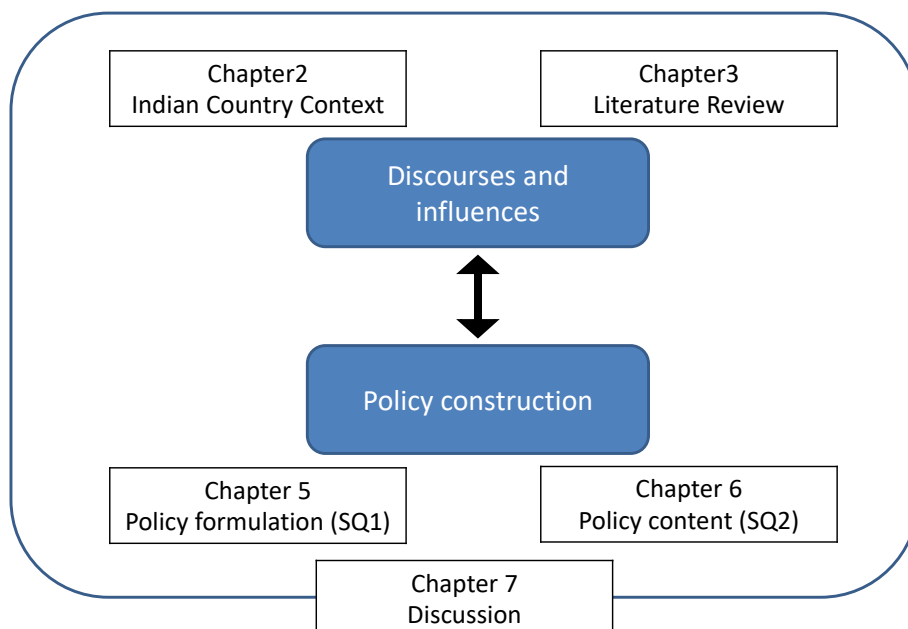
Figure 7: Theoretical framework of the study

Discourses and influences is concerned with international and national macro social, political, economic conditions, ideas and trends that influence policy discourses. The global policy trend reviewed in this chapter such as GEP, neoliberal framing of education discourses, managerial approach to quality of education and proliferation of EQA are located in this field, which might have influenced the policy of this study. Similarly, the national context in Chapter 2 also informs this aspect of discourses and influences.

Policy construction has to do with policy problem setting and policy text production including political agendas and struggles of actors and influencers. Both of my sub-questions (SQ) investigate this aspect from different perspectives. SQ1 concerns discursive practices involved in policy agenda setting and policy text production process. It explores the contribution of micropolitics played out inside the state to text production and factors which shaped the process. SQ2 concerns the content of policy texts, as 'policy-as-text' (Ball, 1993). These two questions are not distinct, but linked, thus attention is paid to illuminate how the process influences policy texts. In exploring these SQs, attention is paid to seek the influencing factors, linking to the aspect of *discourses and influences.*

This is an empirical study paying close attention to 'the processes, reasons and circumstances that explain how and why policy-makers (or other education stakeholders) select, embrace, and/or borrow global education policies' (Verger, 2014, p. 14). What is crucial for this approach is having rich information from various sources and conducting meticulous analysis in the National Context Chapter, Literature Review Chapter, Finding Chapters, and to synthesise them to construct arguments in Discussion Chapter.

3.7   Summary

This chapter reviewed the literature necessary for this study. It examined how globalisation affects education policy. Some policies are adopted in many countries and considered as global education policy (GEP). EQA especially in the form of accreditation can be considered GEP, which has gained popularity in many HE systems in the context of increasing demand for accountability and need for cross-national comparability. However, the review found a weak theoretical foundation, critique for non-suitability to education, concern over transferability, and insufficient empirical studies. The EQA in many countries is a result of globalising education policy space, and for this reason, I believe that this is a suitable case to investigate the global in national policy-making.

Similarly, there has been unprecedented attention to teacher policies, teacher preparation, and outcome-based accountability systems that govern them and measure their effectiveness (Cochran-Smith et al., 2016, 2013; Cuban, 2004; OECD, 2013). Such neoliberal policy framing including outcome, assessment, accountability, private sector participation, and incentives have been normalised in education sector stakeholders. In this context, TE programme accreditation, the topic of this study, has also started to gain attention. While there are empirical studies of TE accreditation implementation, empirical studies on the policy construction phase are particularly scarce. It is hoped that this study provides one account on policy construction.

This chapter also introduced the theoretical framework of this study. I have devised a framework for understanding policies, which has four aspects: (i) discourses and influences, (ii) policy construction, (iii) policy in practice, and (iv) impact. This study focuses on the first two aspects. The next chapter discusses the methodology of the study.

Chapter 4 - Methodology

4.1 Introduction

This chapter reviews the methodological approach used in this study. It begins by discussing the epistemological and ontological assumptions that inform this inquiry (4.2). It then outlines the methodological orientation and the research question (4.3). The chapter also discusses the data collection methods and data source (4.4), data analysis (4.5), positionality (4.6), and the measures of trustworthiness (4.7). It then discusses the ethical considerations (4.8) and concludes with the limitations of the study (4.9).

4.2 Philosophical orientation

As a researcher, it is important to articulate the research paradigm that guides research inquiry. Guba and Lincoln (1994) define a paradigm as a basic belief system based on ontological, epistemological, and methodological assumptions. Ontology refers to 'the nature of our beliefs about reality' (Richards, 2003, p. 33), epistemology concerns with the 'nature and forms [of knowledge], how it can be acquired and how communicated to other human beings' (Cohen et al., 2011, p. 6) and methodology is an articulated logic and flow of the systematic processes followed in conducting research to gain knowledge (Kivunja and Kuyini, 2017). The dominant research paradigms applied in education research include positivism, post-positivism, interpretivism, constructivism, critical paradigm and pragmatic paradigm (Guba and Lincoln, 1994; Kivunja and Kuyini, 2017). I approach this research through a constructivist lens. It considers reality is perceived subjectively as a social construct of the human mind. It stresses the active role of individuals in the social construction of social reality, but it does not necessarily reject the pre-existence of objective reality (Bryman, 2016). For example, Elkind (2005) argues that there is a real world independent of our experience, but we have to understand it within our innate categories of knowing. The following excerpt expresses my position:

> Constructivism is the recognition that reality is a product of human intelligence interacting with experience in the real world. As soon as you include human mental activity in the process of knowing reality, you have accepted constructivism (Elkind, 2005, p. 334).

Following this understanding of constructivist paradigm, this research primarily focuses on understanding how subjects think or make meaning in particular contexts. This position also suggests that researchers construct knowledge through their own thinking and interaction with research participants and data, of which I must be mindful in the research process (Kivunja and Kuyini, 2017).

In addition, it was important to find a position that reconciles the constructivist paradigm with my normative orientation shaped by my professional work as a development worker. It is difficult to be interested in knowledge for knowledge's sake, and my interest in research is the transformative outcome, i.e. potential contribution to achieve a more equitable society through the study and better-informed professional work. This leads me to adopt a critical lens to constructivism, 'a critical form of epistemological constructivism buoyed by a nuanced understanding of power's complicity in the constructions people make of the world and their role in it' (Kincheloe and McLaren, 2011, p. 291). It seeks analytically to place actors and the meanings they make in a wider context that is limited by economic, political and ideological forces (Schofield Clark, 2014). What is particularly important for this study is that critical researchers understand that language serve to construct the world rather than a neutral description of the real world (Kincheloe and McLaren, 2011). This understanding of discursive power is central to the study's inquiry and underpins the choice of research design and methods as explained in this chapter.

4.3   Methodological orientation and research question

4.3.1   Qualitative research

I chose a qualitative approach for the study for several reasons. First, it is consistent with my research paradigm. Constructivist paradigm tends to assume qualitative research strategy with a naturalist methodology such as interviews, discourses, text messages and reflective sessions, with the researcher acting as a participant observer (Bryman, 2016; Kivunja and Kuyini, 2017). The second reason is consistency with the purpose of this study, which is to construct a plausible account of national policy-making in India in the context of globalising education policy. The qualitative approach is useful when the nature of research questions require exploration of the meaning the people give to events they experience (Denzin and Lincoln, 2011).

In particular, I believe that my research question is best answered using a qualitative case study. Creswell (2013) describes the qualitative case study approach as an exploration of a case or cases over time through detailed, in-depth data collection involving multiple sources of information. The outcome is an intensive description and analysis of a case (Merriam, 1998). Qualitative case studies are described as best suited to research that asks 'how' and 'why' questions as it can grasp the intricacies of a phenomenon (Stake, 2005). The most defining characteristic of the case study approach is the choice of what is to be studied, i.e. delimiting the case (Dumez, 2015; Merriam, 1998; Stake, 2005). Merriam (1998, p. 27) sees the case as 'a thing, a single entity, a

unit around which there are boundaries', which could be a person, a program, a specific policy and so on. This study is a case of the construction of the policy of accreditation of TE programmes in India.

Generalisability in the case study is briefly discussed here, as it is important to frame the purpose of the study. Generalisability perhaps is the most criticised element when it comes to case studies (Firestone, 1993; Gerring, 2007; Miles, 2015; Woodside, 2010). However, I am in agreement with authors such as Flyvbjerg (2004, 2001) and Ruddin (2006) who defend generalisability in qualitative case studies as different reasoning from statistical inference. While Flyvbjerg (2004) convincingly argues that generalisability can be amplified by the strategic selection of critical cases, this case is a more general case, which may be categorised as an intrinsic case (Stake, 2005). Therefore, in this case, the idea of naturalistic generalisation (Stake, 2005) or notion of transferability (Lincoln and Guba, 1985) is more relevant; that is, researchers' liability is to provide sufficient description to facilitate the reader's judgement as to whether a particular case can be generalised to another context. Believing in the power of context-dependent knowledge in human learning (Flyvbjerg, 2004), this study aims to provide one particular and thorough account of global education policy (GEP) adoption and effects of global policy discourses in a local place, which is not a sufficiently studied area despite a global convergence of policy discourses (Verger et al., 2018). Due to the strength in capturing the unique intricacies of a phenomenon (Stake, 2005), the case study approach has been selected for this study.

4.3.2 Research Questions

In line with my philosophical and methodological orientation, my overarching research question is framed as follows:

> How is the policy of accreditation of teacher education programmes in India discursively constructed?

The policy of interest is the Memorandum of Understanding (MoU) signed in 2002 between the National Council for Teacher Education (NCTE), the Indian national regulatory body for TE, and the National Assessment and Accreditation Council (NAAC) to start assessment and accreditation of degree-level TE programmes. As discussed in Chapter 3, accreditation, a dominant approach of EQA, has been adopted in many countries to the extent that it can be considered as a GEP.

I address the overarching question by answering the following two specific sub-questions (SQ).

SQ1 - What was the agenda setting and policy text production processes of the policy of the accreditation of teacher education programmes in India?

SQ2 - What are the discourses embedded in the policy of accreditation of teacher education programmes in India?

The questions are framed to examine the policy construction from different perspectives: while SQ1 investigates the policy formulation, SQ2 examines the policy text.

The study critically examines national policy-making in the context of globalisation. In accordance with my philosophical orientation, I perceive policy-making to be a social process and attempt to illuminate the actors, powers, circumstances, processes, and influences of global policy discourse that framed the policy in a certain way. By examining discourses in the construction of the policy and policy texts, the research provides a plausible account of the national policy-making in India in the context of globalising education policy.

4.4   Methods of data collection and sources of data

Research method represents a technique for collecting data (Bryman, 2016). Case studies often use multiple sources of evidence, in order to yield multi-faceted perspectives and construct compelling representations of accounts in the cases (Ragin, 2000; Rowley, 2002). Examining data collected through multiple methods help triangulation, and 'corroborate findings across data sets and thus reduce the impact of potential biases that can exist in a single study' (Bowen, 2009, p. 28).

Two research methods were deemed especially suitable for this study: (a) document analysis and (b) semi-structured interviews. The main data sources are: (a) policy texts, and (b) interview data. The selection of these methods and data sources was guided by my philosophical position, methodology and the research question. In this section, I first describe document analysis (4.4.1), followed by a discussion of semi-structured interview (4.4.2).

4.4.1 Document analysis

I discuss document analysis in two parts: discussion of method and sampling.

Document analysis as data collection method

Document analysis is a systematic procedure for reviewing or evaluating documents to elicit meaning, gain understanding, and develop empirical knowledge (Bowen, 2009;

Corbin and Strauss, 2008). Document analysis is particularly applicable to qualitative case studies such as this research to provide rich descriptions of a single phenomenon, event, organisation or program (Bowen, 2009; Stake, 1995; Yin, 2009). Documents can serve a variety of purposes as part of a research undertaking, including providing 'background and context, additional questions to be asked, supplementary data, a means of tracking change and development, and verification of findings from other data sources' (Bowen, 2009, p. 30). Moreover, documents are an effective means of gathering data when events can no longer be observed (Bowen, 2009), which is so in this study. Another advantage of using archive materials for research is that possibility of a reactive effect can be largely discounted as they were not created for research (Bryman, 2016).

Documents can be broadly divided into primary documents (i.e. direct records of an event), and secondary documents (i.e. analysis of the primary documents), but in reality the distinction is blurred (Cohen et al., 2011). Bryman (2016) quotes Scott (1990) who pragmatically distinguished between personal documents and official documents and further suggests four criteria for assessing the quality of documents: authenticity (genuine and of unquestionable origin), credibility (free from error and distortion), representativeness (typical of its kind) and meaning (clear and comprehensible). These criteria of Scott (1990) are used to consider the quality of selected documents in the section of trustworthiness (4.7).

Sampling of documents

The documents were selected based on the following criteria:

1) Official government document concerning the start of the NCTE-NAAC accreditation;

2) Primary documents that have the potential to shed insight into the perspectives of each organisation on the NCTE-NAAC accreditation around the time the agreement was made.

The first criterion is to search the primary text of policy analysis, and it was found that the MoU between the NCTE and the NAAC in 2002 started the accreditation of TE programmes in India. The MoU was time-bound for three years and was renewed three times in 2005, 2008, and 2014, and were practically identical to the 2002 MoU. I also searched documents that record the policy-making process such as minutes of meetings or reports, but no such record was found.

The MoU is a very brief document that gives a general description of objectives and agreed actions, thus supplementary documents were sought using the second criterion. One publication each from the NCTE and the NAAC was selected: a five-year strategic plan of the NCTE, the *NCTE Perspective Plan 2003-2007* that contains a section on the agreement of the policy of the study; and the NAAC manual, *Manual for Self-appraisal of Teacher Education Institutions,* that operationalised the TE accreditation system. The table below summarises the selected documents.

Table 10: List of main documents for analysis

Name	Year	Description
MoU between the NCTE and the NAAC	2002	Agreement to started the NCTE-NAAC accreditation of TE in India. The primary policy text of this case study.
MoU (renewal)	2005 2008 2014	Renewal of the initial MoU. The content is practically identical to the first one, thus referred to but not examined separately.
NCTE Perspective Plan 2003-2007	2003	NCTE's five-year strategic plan. It refers to the start of NCTE-NAAC accreditation.
Manual for self-appraisal of Teacher Education Institutions	2007	Publication by the NAAC. It explains the NCTE-NAAC accreditation of TE.

Following Brown's (2009) categorisation of purposes of document analysis, the MoU is the primary text of policy analysis, the renewed MoU provides means of tracking change and development, and the publications by the NCTE and the NAAC provide important supplementary information as well as background and context.

4.4.2 Semi-structured interview

Another method used for the study, semi-structured interview is discussed in three parts: discussion of method, sampling and interview process.

Semi-structured interview as data collection method

Interviews, 'a time- and space-bounded interaction between (usually) two individuals, who come to the event with very different backgrounds, different forms of capital and different expectations of the process' (Grek, 2011, p. 233), are widely used method for data collection in social research to elicit all manner of information. Guided by my philosophical position, I regard the interview as a social encounter where interviewees and interviewers co-construct the accounts (Rapley, 2001), rather than a site for pure information transfer or transaction with bias that needs to be controlled (Cohen et al., 2011, p. 410).

There are different typologies of the interview, but a major difference appears to lie in the degree of structure. While interviews tend to become more standardised and quantitative when one has clearly specified questions and wishes to have comparable and readily aggregatable data, interviews are less structured and open-ended when one wishes to acquire unique and personalised information about how individuals view the world (Bryman, 2016; Cohen et al., 2011). Following this, structured interview is a prominent method in quantitative research, and unstructured and semi-structured interviews are the two main types of interview in qualitative research (Bryman, 2016). As the purpose of using the interview method in this qualitative research is to gather personalised information of knowledge and understanding regarding the NCTE-NAAC accreditation policy and policy-making processes of the interviewees, a less structured interview fits the study.

In unstructured interviews 'the interviewer typically has only a list of topics or issues, often called an interview guide or aide-mémoire, that are to be covered' (Bryman, 2016, p. 213), while in semi-structured interview, 'the researcher has a list of questions or fairly specific topics to be covered, often referred to as an interview guide, but the interviewee has a great deal of leeway in how to reply' (Bryman, 2016, p. 471). Although there are differences in the degree of structure, there are many commonalities. Both interviewing can be flexible, responding to the direction in which interviewees take the interview, through asking new questions that follow up interviewees' replies and adjusting the order and wording of questions. This would give insight into what the interviewees see as relevant and important, which may result in changing the emphasis in the research. The choice between unstructured and semi-structured interviews is guided by factors such as whether the researcher has a general notion of a topic or a clear focus, whether more than one person conduct interviews, whether the researcher is concerned that the use of even most rudimentary interview guide may affect responses (Bryman, 2016).

As discussed, the focus of interviews in this research was fairly clear, and the semi-structured interview was deemed more appropriate for this study. This type of interview allows generating information on specific topics while leaving flexibility to capture unexpected issues and information (Kvale and Brinkmann, 2009). Both aspects were important for this research as I wished to elicit personalised accounts on specific topics of the research, such as the policy agenda and policy-making process across the interviewees, while leaving flexibility to capture other issues that interviewees consider important and relevant.

A semi-structured interview guide was developed to guide the interview (see appendix 2). I framed it using my research questions and the theoretical framework I discussed in the literature review chapter. It was slightly elaborated to sharpen focus following the first interview where I obtained the MoU text. The interview guide was mainly organised around three inter-related areas: the content of the policy, the process of the policy formulation, and the wider context and influence. It lists key topics to cover and sample questions.

Interviewee sampling

The suitability of sampling strategy constructs an important part of research methodology. My principal target population was people who were directly involved in the policy-making. Hence purposive sampling was used 'to sample cases/participants in a strategic way so that those samples are relevant to the research questions that are posed' (Bryman, 2016, p. 418). This sampling method is appropriate to gain information from a particular group of people, who have in-depth knowledge about particular issues due to their positions or experiences (Ball, 1990). There are a variety of types in purposive sampling, and this case may also be called 'politically important case sampling', a type of purposive sampling of special cases (Cohen et al., 2011).

My first interview was with the person I became acquainted during my prior work in Pakistan who has been a long-time custodian of Indian TE accreditation, as mentioned in Section 1.3. This person, referred to as NAAC1 in the study, became the gatekeeper of my research who identified and introduced the core people who were also involved in the policy-making. Further, as I proceeded with other interviews, I asked each interviewee if they could recommend others who had first-hand knowledge of the policy-making process or who could provide expert knowledge on the context of TE of that time. In this sense, I would describe my sampling approach as snow-ball sampling where 'sampled participants propose other participants who have had the experience or characteristics relevant to the research' (Bryman, 2016, p. 424).

The list of interviewees that resulted from the sampling process is provided in Table 11 and Table 12. Table 11 lists the interviewees who had first-hand knowledge of the formulation of the NCTE-NAA accreditation policy, and Table 12 lists other resource persons who provided important contextual information. When code names are assigned to participants, organisation names are included as a part of code as comparison of accounts from different organisations is important for analysis. Although they are presented in two separate lists for convenience of description, the interviews of two

groups were conducted in parallel. The sequence of interview is elaborated in the part of interview process. The interview participants are explained below.

Table 11: List of key interview participants

No	Code	Description
1	NCTE1	Senior official, participated in the policy negotiation meetings
2	NCTE2	Senior official, participated in the policy negotiation meetings
3	NCTE3	Senior official
4	NAAC1	Senior official, participated in the policy negotiation meetings
5	NAAC2	TE expert, participated in the policy negotiation meetings
6	NAAC3	Member of National Consultative Committee of the NCTE-NAAC accreditation

Table 11 provides six interviewees associated with the NCTE or the NAAC who had first-hand knowledge of the formulation of the NCTE-NAAC accreditation policy. They are considered as a primary source who provide direct or first-hand account about an event and enables researchers to get as close as possible to what actually happened during a particular event or time period (Cohen et al., 2011). They were senior government officials or TE experts who were associated with those organisations at the time of policy-making. The list includes people who attended the policy-text negotiation meetings between the NCTE and the NAAC, as well as who had first-hand knowledge of the policy discussion within either of the organisations as insiders. In terms of the total number of attendees of the negotiation meetings, there was a slight variety in the accounts of interviewees, totalling either six or seven people. Among them, I managed to contact five people, of whom one person was just leaving the country and could not be interviewed. Therefore, I interviewed four people (NCTE1, NCTE2, NAAC1, NAAC2) who provided information on which phase of the policy-making is detailed in Chapter 5 when analysing the policy-formulation process.

Table 12: List of additional interview participants

No	Code	Description
7	TEexpert1	TE expert at government research institute
8	TEexpert2	TE expert at government research institute
9	TEexpert3	TE expert at government research institute
10	TEexpert4	TE expert at government research institute
11	Stategov1	Senior education officer at a state government
12	Stategov2	Senior education officer at a state government

Table 12 lists other resource persons who provided important contextual information. As the context is crucial for the analysis of this study, their interviews are also important though they are not directly quoted as frequently as the first group. It includes four TE experts who provided expert views of the context of the time of the policy-making. They

are typically deans or professors of teacher education department of universities or specialised research institutes. They also had intimate knowledge on both the NCTE and the NAAC, as these organisations often invite renowned TE experts in various capacities rather than having many in-house experts.

To find additional interviewees, I did not set strict criteria, but rather I chose to follow what the key informants considered important for me to know for my research. This approach led me to interview two state government officials, as it was strongly recommended by one interviewee to understand the complex dynamics of TE governance in India as an important context for my study. It indeed gave me insight into the particular difficulties of state government in managing degree-level TE providers within the state and coordination with other players. There was one more person who had been recommended but not available for an interview.

Interview process

The interview processes are discussed in relation to four aspects, which are listed below: the sequence of interviews; the dynamics between interviewees and interviewers; the details of the interview process; and the specificities of the main interviewees.

Firstly, the sequence of interviews of 12 informants is explained. I first interviewed NAAC1, the gatekeeper of the research. In this interview the rest of the members in Table 11 were identified, while the interviewees in Table 12 were suggested as the other interviews proceeded. Logistical consideration was important to determine the sequence of interviews. As the interviewees were located in several different cities of India, I attempted to schedule interviewing all those who were located in the same area during one stay as much as possible.

The effect of the interview sequence on the interview questions and knowledge-gathering is reflected here. The information I was gathering during the field work through interviews and document search informed the subsequent interviews. For example, better understanding of the topic enabled me to refine questioning or add follow-up questions. As a result, I decided to travel back to the same city to conduct follow-up interviews of key informants whom I interviewed at earlier stage. In other words, data exploration during the data collection informed the subsequent data collection (Bryman, 2016; Cohen et al., 2011). Although the topics of the interview guide remained same, framing of questions became more detailed and refined.

Secondly, following the position to regard interviewing as a social encounter where 'interviewees and interviewers work to construct themselves as certain types-of-people in relation to the topic of the interview and reflexively the interview itself' (Rapley, 2001, p. 303), the dynamics between the interviewees and me as well as its effects on the interview are discussed. As my main interviewees were people in senior positions who were involved in the policy-making process, this research may fall into what Maguire and Ball (1994, p. 279) refer to as "'elite' studies or what might be called situated studies of policy formation". Interviewing such 'elites' presents unique methodological challenges for a novice researcher like myself, because of imbalances of power that can exist between interviewee and interviewer (Liu, 2018). A variety of challenges associated with interviewing 'elites' are discussed in the literature including (i) gaining access (Mikecz, 2012; Ostrander, 1993); (ii) building trust with them (Thuesen, 2011; Welch et al., 2002); and (iii) the power in favour of the interviewees who tend to control the agenda (Burnham et al., 2008; Bygnes, 2008). These three points are reflected in the next paragraph.

The first point concerning gaining access (i) was not a major problem possibly due to "the 'right' institutional affiliation" (Grek, 2011, p. 237), i.e. my association with the gatekeeper, NAAC1, who referred me to the key interviewees, and the policy of the study being perceived non-controversial. For the second point (ii), I made conscious efforts to build trust. Ostrander (1993) argues that interviewers need to build a rapport with elite subjects from the moment they contact them. At the beginning of each interview, I tried to be transparent and provided information about myself and the research. Interviewees often asked additional questions such as my background, to which I responded. I regarded it an important process to establish an atmosphere to make both interviewee and interviewer comfortable to talk. For the third point regarding interviewees controlling the agenda and steering the discussion (iii), it may have been the case in some interviews, but I did not find this problematic as I wanted them to construct the story according to their perspectives as much as possible. For example, some answers were reframed from different perspectives instead of directly answering questions, and there were even times when I thought interviewees were rambling, but I later realised that they were talking about important factors whose relationship to the topic I was not even aware of.

Thirdly, interview process is reflected. All the interviews were conducted face-to-face during the field visit in late 2014. Interview locations were selected by the interviewees. Some interviews were conducted at their home, some were held in the interviewees' offices, one took place at a café during the break at a conference, and one took place at

a garden on a campus. The interview locations were usually quiet and undisturbed. In two of these cases, the interviewee had limited time to spare, and not many additional questions were asked, though all the interview topics were covered. Other interviewees provided generous time until I exhausted all the follow up questions. All the interviews were conducted in English, and all participants had a high level of competency of English language. There were no noticeable language barriers during the interview. When participants' consent was obtained, interviews were recorded. Three interviewees were reluctant to be recorded and I took detailed notes instead.

I found that most of the interviewees were enthusiastic, and pleased to share their knowledge, expertise and perspectives. However, the interview rarely flowed according to the interview guide. Many interviewees often developed the discussion rather than just giving an answer to a question. As a semi-structured interview, I applied a good degree of flexibility and encouraged the interviewees to tell the story in the way they constructed it. This often gave insight into how the interviewee understood the context and event as well as what the interviewee saw as relevant and important. I also added new questions to follow up interviewees' replies to elicit more details, opinions or reasons according to their understanding. The interview guide acted more as a guideline to ensure all the topics are covered.

Lastly, specificities of the key interviewees (Table 11) are reflected. Five out of the six interviewees (except NAAC1) had already retired from their official positions by the time of my fieldwork in 2014. Many of them offered extensive time for the interview at their home. I felt their retired status without official responsibilities and family environment made them particularly comfortable to talk. This is when I most felt as an 'audience' to hear their stories and histories. As a result of their age and experience, they had extensive historical perspectives on TE in India, and the accounts from these experts were dynamic and rich in narrative. While these can be considered as advantages of interviewing people who are retired from their official positions, there may be potential disadvantages. For example, if they had still occupied the official positions, more up-to date internal information could have given them different perspectives, though the response may have been more restrained. Moreover, interviewing about the past may also have effects on findings. In this case, it seemed that the perspectives of the interviewees had been well established through reflecting about the event in the historical context. It may be possible that their views could have been more nuanced if interviewed while they were still actively constructing the meaning of the event. It could

be said that the interviews in this study were conducted to elicit the policy-makers'
recollections of the event.

4.5 Data analysis

In this section, I describe data analysis. It starts with the strategies of qualitative data
analysis applied in this study (4.5.1), followed by the process of document analysis
(4.5.2), and interview transcript analysis (4.5.3).

4.5.1 Strategies of qualitative data analysis for the study

One of the difficulties with qualitative research is that it generates a large corpus of
unstructured textual material, and unlike quantitative data analysis, clear-cut rules for
data analysis have not been developed (Bryman, 2016). Indeed, as a novice researcher,
I struggled to find analytic paths through the rich data I collected. In this section, I briefly
note on the relation between the data collection and data analysis phases, then presents
my approach for data analysis.

Qualitative research is often described as iterative. There is a repetitive interplay
between the data collection and data analysis (Bryman, 2016; Cohen et al., 2011), which
was the case in my study. I consciously started data exploration during the data collection,
so that it informed the subsequent data collection (Bryman, 2016; Cohen et al., 2011).
For example, as indicated in the document sampling section, the MoU did not provide
much information beyond generally agreed action. I had expected documents recording
the negotiation for policy text production, but none was found. This made me choose two
supplementary documents published by the NCTE and the NAAC to shed light on the
motivation of each organisation.

I explain the approach I adhered to for analysing data, both document and interview
transcript. In line with my philosophical orientation as critical constructivist and the
theoretical framework with *policy-as-discourse* approach (see Chapter 3), critical
discourse analysis (CDA) was employed as my main approach to data analysis. There
are several different approaches to discourse analysis, and it commonly regards texts
and talk as social practice whereby meaning is created, and analyse the construction of
meaning in context instead of taking texts at face value (Bryman, 2016; Cohen et al.,
2011). In addition, what is essential for CDA concerns 'the role of language as a power
resource that is related to ideology and socio-cultural change' (Bryman, 2016, p. 536),
though I also acknowledge that there are different groups within CDA (Breeze, 2011).
Critical researchers study the way language in the form of discourse serve as a form of

regulation and domination, through tacit rules on what can and cannot be said, who can speak with authority and who must listen, whose social constructions are more valid than others (Kincheloe and McLaren, 2011). As discussed in Section 4-2, what is particularly important for this study is this critical researcher's understanding of discursive power where language serves to construct the world rather than neutrally describe the real world (Kincheloe and McLaren, 2011). Thus, guided by my overall methodological stance, I applied a critical lens and chose CDA for my main approach.

To guide the analysis of a discursive event in context, a three-dimensional framework is often used. This includes the analysis of texts, the examination of the form of discursive interaction, and the consideration of the social context in which the discursive event is taking place (Grant et al., 2004; Janks, 1997; Rogers et al., 2005). This research is designed to analyse discourses in all three dimensions. The table below shows my focus in each dimension of the discourses and where my analysis is found in this study. It includes intertextuality, one of the key concepts within CDA (Bryman, 2016), which draws attention to the interconnection between similar or related texts including implicit referencing to other texts such as echoing use of words and concepts (Rizvi and Lingard, 2009).

Table 13: Dimensions of discourses and my focus

Dimensions	My Focus	Location
Text	Policy text analysis	Chapter 6 – findings for SQ2
Discursive practice	Policy text construction	Chapter 5 – findings for SQ1
Social practice	Global discourse	Literature Review & Discussion Chapter
	National context	National Context & Discussion Chapter
	Intertextuality with other policy	National Context & Discussion Chapter

Adopting Philipps and Hardy's (2002, p. 8) analytical device for CDA practitioners to reveal the meaning of a phenomenon in an organisational context, I explored how the key concepts of the policy are constructed to have a particular meaning; how the discourse is constructed through texts; how the discourse draws on as well as influences other discourses; how the discourse gives meaning to social practice in relation to the policy and makes certain activities possible, desirable or inevitable; and how particular actors draw on the discourse to legitimate their positions and actions. While some of these questions gave concrete ideas for analysis (such as examining key concept of *quality* in Chapter 6), others guided analytic mentality (such as reflecting on data from documents or interview transcripts with these questions in mind).

I acknowledge there are also critiques of CDA as a method for analysis, and discuss several points that seem important for this study. Breeze (2011) conducted a detailed analysis of the various critiques on CDA. One point she identified is that CDA is defined by its political aims and as such the analysis reflect this. However, since researchers bring their own culture, norms, and values to conduct their research, especially qualitative research, I believe being sensitive to and articulate about existing conceptualisation and its effect on interpretation is imperative. In this vein, my positionality is reflected later in Section 4.6. Another criticism is that CDA uses 'impressionistic' methodology and also moves too quickly to interpretations (Breeze, 2011). In my view, this can be the case for any discourse analysis, not just CDA. As discourse analysis investigates the text in context and looks beyond the text rather than fragmenting them, it seems difficult to fix clear-cut procedures everyone can follow. Moreover, discourses and texts are multi-layered and open to a range of interpretation (Bryman, 2016). This makes it important for the researcher to make the utmost effort to do justice to the text to ensure their interpretations are well grounded.

4.5.2 Document analysis process

While the use of CDA described in the proceeding section applies to both analysing document and interview data transcription, this section adds specific notes on my document analysis process. The documents selected for analysis were all well-structured government official documents, which made finding relevant parts less complex. Bowen (2009) suggests that document analysis is an iterative process that involves 'skimming (superficial examination), reading (thorough examination), and interpretation', which seems to describe the process I followed when analysing key documents. Most of the examined parts of texts were very short, and line by line analysis was done without coding. Guided by the research questions and analytic guiding questions of CDA, explained in the previous section, I repeatedly read the texts to identify pertinent information, conducted focused re-reading, comparison with other texts and data, and tried to understand it in the wider contextual information. The interview transcript analysis especially on the policy text formulation process also informed the document analysis. This process led me to identify emerging themes.

There were two main challenges I encountered, first, the absence of documented information. For example, the policy agenda and policy-making process (topics concerning SQ1) was scarcely documented, and the MoU, main policy text, was a short and generic document (concerning SQ2). However, I attempted to carefully investigate 'what is not said, what discourses make it impossible to say, what practical or theoretical

logics hide away from sight' (Miller and Stronach, 2005, p. 313). Second is the analysis of the accreditation criteria (Chapter 6). Among the examined part of the documents, only this part had a large quantity of data, which consist of as many as 317 questions without a clear structure. This made it difficult to thoroughly analyse the criteria as a whole, and instead, I focused on key aspects for analysis.

4.5.3 Interview transcript analysis process

This section explains the process of my interview transcript analysis. It was an iterative and messy process, but for the purpose of description, it is broadly divided into six phases, though they did not happen in a linear manner. Firstly, the interview data were transcribed, when recording was permitted. When interview notes were recorded, they were reorganised and typed. This process enabled me to engage with the data in detail and to reflect on the interview process.

Secondly, I explored transcripts by skimming and reading to identify emerging themes and reach interpretation. It was a similar process that I followed in the document analysis using the phases described by Bowen (2009) above. However, identifying and developing emerging themes was not straight-forward especially because my interview data was not organised since I encouraged the interviewees to tell the story in the way they constructed it.

Thirdly, as I struggled to find analytic paths in the voluminous data, I tried initial coding to organise data using NVivo. These codes were framed by the interview questions and very initial thoughts on emerging themes I had through reading the data. This process helped me examine data systematically, but also identified more pertinent information and more emerging themes with various nuance in similar themes (See appendix 3 for some examples of coding).

Fourthly, I revisited the transcript to re-examine the pertinent information and emerging themes in context. Guided by the research questions and analytic guiding questions of CDA explained in Section 4.5.1, I re-examined suitability of my initial analysis and interpretation in the context, paying attention to how the interviewees constructed their responses, explained the context and its influence, and connected between different phenomena.

Fifthly, I also reviewed the emerging themes in relation to the document analysis and other supplementary texts. Moreover, for important points such as major claims by the

interviewees, emerging themes, key events and important situation of the time, cross-reference of data and additional search of documents was attempted. This was particularly carefully done when there were disagreements within/ between data.

Sixthly, I adopted what might be described as a coding approach for emerging themes and sub-themes. By this phase, I had a clearer idea of key emerging themes for the study, and it was done to help organise the data to avoid 'impressionistic' methodology that moves too quickly to interpretations, one of the critiques of CDA (Breeze, 2011). I used a spreadsheet and listed key parts of the interview transcript according to the codes for easy comparison. This was a useful step for me to re-confirm the appropriateness of my interpretation and to notice nuanced differences between similar responses and exceptional ones.

Throughout the analysis, I repeated the process of systematic focused examination using coding and re-examining suitability of my analysis and interpretation in the original transcripts and contextual information. This was a conscious effort to keep text together rather than fragmenting them, with the understanding that all texts are socially constructed and it is important to analyse them in context, instead of taking them at face value. These processes seem to match what Maxwell and Chmiel (2014) describe similarity-based analysis through categorisation and contiguity-based analytic strategies looking at connections. Both perspectives were important and complementary in my analysis process.

4.6   Positionality

In qualitative research, critical self-reflectiveness to examine how the researcher and intersubjective elements impact on and transform research has been increasingly considered important in order to achieve greater transparency and quality (Finlay & Gough, 2003). Researcher positionality can impact on all aspects and stages of the research process as Foote and Bartell write:

> The positionality that researchers bring to their work, and the personal experiences through which positionality is shaped, may influence what researchers may bring to research encounters, their choice of processes, and their interpretation of outcomes (Foote and Bartell, 2011, p. 46).

Rizvi and Lingard (2009) further assert that all policy analysis must practise reflexivity, which demand transparent articulation of researcher positionality and the significance of this in terms of their value stances, their problem choice, and their theoretical and methodological frames. Three particular aspects of my personal and professional

background seem important to mention as my positionality in relation to this study: being student; being an outsider to the context; and having worked to establish a TE accreditation council in Pakistan.

Firstly, my student status influenced the interview as a social encounter. Most of the interviewees were educationists at HEIs, and my primary status as student researcher seems to have shaped the interaction at the interviews as if it was between a teacher and a student. Many interviewees were very supportive, some gave me extra advice for my study, and one person loaned me a PhD thesis of his student that may have some connection with my study. This relationship made it easy for me to ask additional questions or advice.

Secondly, my outsider status as a foreigner and an outsider of their apparent tight-knit TE expert network may possibly have affected the data collection and analysis. It may have limited the richness of the data I collected through interviews and my contextual understanding, particularly the undocumented information and subsequent analysis (Kerstetter, 2012). Interviewing, reading and writing in non-native language may also have limited understanding and analysis. However, during the interview, there were also times when I felt my outsider status seemed to help to open them up to discuss sensitive issues. For example, some interviewees shared their critical opinions and seemingly insider information, though it was sometimes requested not to use this type of information, which I respected. My outsider status also made it easier for me to ask for clarifications and describe in their own words even when I could guess what people were implying.

Due to my primary identity as student and outsider in the interviews, I felt my relationship with the key interviewees was close to what Grek (2011) argues about the opportunities presented to international early career researchers when interviewing education policy elites:

> The role of outsider, one who is shy and relatively 'out of the (local) picture', is often adopted by the young (often female) education researcher, and the encounter is quickly recognised by the interviewee as the harmless, 'researcher/tourist meeting a local policy *connoisseur*' type of exchange. Thus, the researcher is seen as needing to be 'told' – this is the non- threatening, 'perfectly harmless' (McPherson and Raab, 1988; Ozga and Gewirtz, 1995) interviewing style, where the junior researcher is seen as not important enough to constitute a threat (Dexter, 1964) – and is thus cast in the role of 'audience'. (Grek, 2011, p. 238)

Thirdly, it is important to acknowledge the potential effects of my knowledge and beliefs I had gained through my work experience in Pakistan to establish an accreditation

system for TE. The concept of bracketing may be useful here, as a method to mitigate the potentially deleterious effects of unacknowledged preconceptions related to the research, though there is no consensus on the elements or timing (Tufford and Newman, 2012). For bracketing, writing memos throughout the data collection was particularly useful for self-awareness and reflection on my engagement with the data (Tufford and Newman, 2012). For example, it made me realise that I had made assumptions on policy-making as the process involving difficult negotiation and finding balance among stakeholders with different opinions, as was in my experience, and I was surprised when the interviewees explained the policy-formulation process was conflict free. Moreover, I guarded against bringing my preconceived notions or personal experiences into the data collection and data analysis, through focusing on listening to the interviewees and asking them to explain in their words and thicker description with quotes.

The reflexive process also made me realise how my experience enriched this research. For instance, I was very familiar with the practical aspects of accreditation systems, which facilitated the communication at the interview, for '[i]t is important to have a very good knowledge of the world that is to be presented - both in order to follow the narrative and to understand its construction' (Grek, 2011, p. 239). I also felt that my work experience familiarised me with cultural norms as I found India and Pakistan bear enormous cultural similarities. This aided me in the data collection process as well as understanding and analysing some critical issues that emerged out of the research such as culturally difficult behaviours.

4.7   Trustworthiness

In assessing the quality of quantitative research, reliability and validity are important criteria. A simple application of these to qualitative research is considered inappropriate, and various prepositions have been made such as adopting the concepts of quantitative criteria or alternative criteria (Bryman, 2016). While there is no agreed criteria in qualitative research, I use alternative criteria, *trustworthiness*, proposed by Lincoln & Guba (1985) to outline strategies of this research to increase and assure quality. The reason of choosing this *trustworthiness* is two-fold. First is its high acceptance in the research community, and second is its philosophical consistency with constructivism (Bryman, 2016; Kivunja and Kuyini, 2017). *Trustworthiness* is made up of four criteria: credibility, transferability, dependability and confirmability.

Credibility refers to the extent to which data and data analysis are believable, trustworthy or authentic (Guba, 1981). While there can be multiple accounts of social

reality, this criterion relates to the researcher's ability to ensure findings align with reality as constructed by the researcher and the research participants (Merriam, 1998). For interviews, I aimed for sufficient and prolonged engagement with the key interviewees, when possible.

The quality of selected documents is discussed here using the concept explained in Section 4.4.1 on document analysis method. While Scott (1990) distinguishes between personal documents and official documents, all the selected document are official government documents. In terms of his criteria for assessing the quality of documents (authenticity, credibility, representativeness and meaning), government documents can be seen as authentic and having meaning (Bryman, 2016, p. 550). Another criterion, representativeness may not apply here, as their uniqueness in official character make them interesting as data source. Concerning credibility, i.e. whether the document is free from error and distortion, government documents are interesting precisely because of the biases they may reveal (Bryman, 2016, p. 550).

To further establish credibility, I used triangulation, which refers to a multimethod approach to data collection and data analysis (Given, 2008). For data collection, multiple methods (documentary analysis and interview) were used to investigate a phenomenon. The combination of methods aided in triangulation that helped me 'corroborate findings across data sets and thus reduce the impact of potential biases that can exist in a single study' (Bowen, 2009, p. 28). Multiple and balanced data sources were also used through collecting and comparing information from various interviewees and various documents, particularly of both the NCTE and the NAAC.

Triangulation was also used at data analysis stage to verify the consistency and integrity of findings (Given, 2008). Respondent validation, which is described as a process whereby the research gives participants the opportunity to check the findings, is also recommended to establish credibility (Bryman, 2016). Although offered, none of my interview respondents wanted to cross-check the transcripts. Instead, during the interview, I often summarised the key point the interviewees were making in the way I understood, and asked the interviewee to correct me if my summary was not appropriate. As for two key interviewees who offered crucial information, I conducted a second interview and verified that my understanding of the interview appropriately reflected their viewpoints.

Transferability regards whether a hypothesis from one context is sufficiently congruent in another (Mills et al., 2009). It relies on researchers to provide detailed descriptions that allow readers to gain insights and make inferences about the possible transferability of findings to other settings (Bryman, 2016; Mills et al., 2009). As the main work of transferability is done by readers who "transfer" the results, it is often discussed as a collaborative enterprise (Polit and Beck, 2010). Most writers suggest 'thick description' to establish transferability, which refers to rich and thorough information (Bryman, 2016; Lincoln and Guba, 1985; Polit and Beck, 2010). I was conscious to organise and present findings to provide thorough descriptive information about the national context, the key organisations, description of policy-making processes and the policy content with quotes from the interviews or documents so that readers can make judgements about transferability.

Dependability refers to the ability to observe the same finding under similar circumstances (Guba, 1981). While it is possible to have multiple interpretations of reality, the researcher's interpretation can be said to be dependable if the researcher ensures that the findings truly emerge from the data gathered and analysed for the research (Kivunja and Kuyini, 2017). Lincoln and Guba (1985) propose to adopt an auditing approach where peers would audit the records of all phases of the research process. I kept records including all the drafts notes, fieldwork notes, interview transcripts, and data analysis, and provided in this Chapter a detailed description of my research process to allow for needed audit. Moreover, my supervisors guided me to follow proper procedures at each phase of the research and assessed appropriateness of my theoretical inferences.

Confirmability refers to the extent to which the findings of the research can be confirmed by others, which suggests minimising researcher's biases contaminating the results of the data analysis (Kivunja and Kuyini, 2017). In terms of researcher's positionality and its significance in research, practicing reflexivity is important as explained in the previous section. My supervisors' guidance was also important to ensure my analysis would be appropriate. Furthermore, the selected documents are public documents which are authentic and publicly available, which enable verification through reanalysis and replication.

4.8   Ethical considerations

Regarding the procedural ethics, I secured approval by the University of Sussex Research Ethics Committee in 2014 as a low-risk research. As all the sample documents

are public document with no issue with privacy or confidentiality, this section discusses ethical consideration for interview participants. There are four main areas regarding the discussion about ethical principles in social research: *harm to participants*; *lack of informed consent*; *invasion of privacy*; and *deception* (Bryman, 2016; Diener and Crandall, 1978), and how these four ethical considerations were addressed is explained below.

Firstly, the principle of *no harm to participants* includes maintaining the confidentiality of records (Bryman, 2016). In this research, participant names were anonymised and codes were used in interview transcripts and dissertation; their names and identifier codes were separately kept; their contact information was kept in soft copy in a locked cabinet; and all the data is securely stored in my password-locked computer. While all the data protection measures were in place, it is also important to acknowledge that there may be a chance that identities could be inferred among the people who have the knowledge of the NCTE-NAAC policy-making process, but there is little possibility beyond this very small group of people as no document that records the policy-making process was found (see Section 4.5.2). I still made respondents aware of the possibility of their identities being recognised by their peers, but none of the participants withdrew from the study. I also gained permission to use the name of the workplace (NCTE/NAAC) in the report. Other types of harm such as physical or emotional harm were not anticipated in this study for interview participants nor researcher.

Secondly, *informed consent* was carefully planned and managed. I first gave a letter to the NAAC authority asking for an approval to interview their staff. I was prepared to do the same for the NCTE, but I was advised it was not necessary as the NCTE officials who were involved in the policy-making process were already retired. Before each interview, I explained my research with the use of an information sheet (see appendix 4). Informed consent sheets (see appendix 5) were also offered, but most of the interview participants said they were not necessary, upon which I did not insist. All interviewees were education experts who were familiar with research and I felt I should respect their choices. I explained that interviewees were free to refuse to participate and stressed their rights to refrain from answering any question or withdraw from the study at any point without giving any reasons. I also explained my data management plan, which is detailed in the previous paragraph. Interviews were recorded only when it was agreed.

Thirdly, *the invasion of privacy* concerns the degree to which invasions of privacy can be condoned (Bryman, 2016). It is linked to *informed consent*, and I made sure to explain

the interviewees what the research participation entails. There were few instances where they shared potentially sensitive information or opinion while requesting not to quote, which I respected.

Lastly, the issue of *deception* occurs when researchers do not properly represent the nature or purpose of the research. As explained above, all interviewees received an explanation about the research through an information sheet. I also answered additional questions about the research and myself to ensure transparency.

4.9   Limitations

I discuss two important limitations to this study. Firstly, the limitation of data source is acknowledged. Documentary source on the policy-making process was very limited as no record was found. Thus, the main information source for the policy-making process was interviewees, and the small number of participants could be perceived as a limitation. However, I believe it did not pose a threat against the trustworthiness of the study for a number of reasons: (i) the policy negotiation process was short without complex discussion; (ii) I managed to interview three people from the NCTE and three from the NAAC (Table 11) among a small number of people who participated in the policy-making; (iii) their accounts were consistent; and (iv) other experts (Table 12) supplemented with first-hand information about the contexts of that time, which were valuable to understand the policy construction.

Secondly, the turbulence that the NCTE was experiencing around the time of my fieldwork in 2014 may have potentially restrained some of the interviewees. The Justice Verma Commission report was published in 2012, which was very critical of the work of the NCTE (Government of India, 2012) (see Chapter 2 and 5 for details). The main critique was about the NCTE's recognition task, and the NCTE-NAAC accreditation, the topic of this research, was lightly mentioned and not treated as controversial in the said report. I felt all the interviewees were comfortable to discuss the topic of my interview. Moreover, their being retired may have made it easier for them to speak. However, while non-NCTE interviewees often mentioned the said report even though it was not directly related to the interview topic, the former NCTE officials did not. This might imply that the former NCTE officials may not have developed the conversation as freely as they would have under different circumstances.

4.10 Summary

This chapter outlined the methodology of the study. It first discussed the ontological and epistemological orientation as critical constructivist that inform this inquiry. The chapter then outlined the research design of qualitative case study and the research question. This was followed by the data collection method and sampling, data analysis, positionality, and the measures of trustworthiness. It then discussed the ethical considerations and concluded with the limitations of the study. The next two chapters look at the findings of the two research sub questions.

Chapter 5 - Formulation of the NCTE-NAAC accreditation policy

5.1 Introduction

This chapter answers the research sub question (SQ) 1: What was the agenda setting and policy text production processes of the policy of the accreditation of teacher education programmes in India? The aim of the chapter is to interrogate the formulation of the NCTE-NAAC accreditation policy by analysing the processes and the context.

The policy document of the study is the first Memorandum of Understanding (MoU) of 2002 between the National Council for Teacher Education (NCTE) and the National Assessment and Accreditation Council (NAAC), which started the NCTE-NAAC assessment and accreditation of TE in India. Further information about the MoU is found in Chapter 4 and the content of the MoU is analysed in Chapter 6. This chapter also pays attention to policies closely related to the NCTE-NAAC accreditation policy. This is important as no policy is created in a vacuum. Rather, policies are located in a 'policy ensemble' of interrelated policies and we need to appreciate the way in which policy ensembles 'exercise power through a production of "truth" and "knowledge", as discourses' (Ball, 1993, p. 21). This also relates to intertextuality, one of the key concepts within critical discourse analysis (CDA) which draw attention to the interconnection between similar or related texts (Bryman, 2016; Rizvi and Lingard, 2009). Examining a policy ensemble may reveal the different significance of a policy that is not found through examining a policy in isolation.

The data in this chapter mainly comes from the interview of ten senior (many retired) government officials and teacher education (TE) experts in India. Some of them were directly involved in the policy negotiation processes, and others have direct or indirect knowledge of the policy-making. Details about the interviewees and interview data are found in Chapter 4. Key organisations are the NCTE and the NAAC. Their description is found in Chapter 2.

The chapter has three main sections which deal with different phases of policy-making. Firstly, it examines the agenda setting phase of the policy discussion, i.e. issue identification which later resulted in the MoU (5.2). Secondly, it investigates the policy negotiation between the NCTE and the NAAC leading to the MoU in 2002, which is a formal agreement to collaborate and start the NCTE-NAAC accreditation (5.3). Thirdly, it looks at the development after 2002 (5.4). Each section has the analysis of the

processes in a chronological manner, but it also delves into a thematic analysis of specific issues highlighted in the chronological analysis. To facilitate readers, the table below lists key events that are important in this chapter.

Table 14: Key events in relation to the NCTE-NAAC accreditation of TE

Date	Event	Note
1993	NCTE upgraded to statutory regulatory body	
1994	NAAC established	
16 Aug 2002	NAAC - NCTE MoU (1st)	Period of 3 years
6 Sep 2005	NAAC - NCTE MoU (2nd)	Period of 3 years
2005-2007	Development of indicators by NAAC-COL	
2007	Development of criteria for TE by NAAC	
7 Oct 2008	NAAC - NCTE MoU (3rd)	Period of 3 years
2013	UGC made accreditation mandatory	
14 Aug 2014	NAAC - NCTE MoU (4th)	Period of 3 years
2017	NAAC - NCTE collaboration terminated	

Source: researcher's compilation

5.2 Agenda setting to initiate the policy discussion

'Agenda setting' or 'issue/ problem identification' is often suggested as the first stage of policy formulation. It is when a certain subject is recognised as a problem that demands government attention (Althaus et al., 2012; Anderson, 2014). This section discusses the issue identification that later resulted in the start of the NCTE-NAAC accreditation.

This section is divided into three parts. It first discusses what happened at the initiation of the policy discussion (5.2.1). It then delves into thematic analysis to further investigate key issues of the agenda setting stage; about the policy problem (5.2.2) and key context that created the policy problem (5.2.3).

5.2.1 Initiation of the policy discussion

This part discusses the initiation process of the policy discussion. The data comes primarily from the accounts of the interviewees as no documentation was found recording this phase. The information mainly comes from four interview respondents, three ex-senior officials of the NCTE (referred to as NCTE1, NCTE2, and NCTE3) and one from the NAAC (NAAC1), all of whom have first-hand knowledge of the initiation phase.

The three NCTE ex-officials consistently stated that the idea emerged within the NCTE. NCTE1 further suggests that the initiation of the policy formation emerged through an

informal discussion among the NCTE senior officials. NCTE1 recalls the moment of initiation as follows:

> This was not discussed through any forum. But this was a discussion, an informal discussion that took place with most of the chairmen. You see, there were four [NCTE] regional committee chairmen, and the national committee chairman was there. We met once together in Bhubaneshwar to discuss about general issues concerning this, NCTE. And we decided that time, we discussed that there was a need for assessing the quality of the performance of the colleges of education. And then it was formally decided that we must get into MoU with NAAC. (NCTE1, senior official, NCTE)

NCTE1 explains the NCTE-NAAC accreditation as an initiative of the NCTE and describes the policy problem as '*a need for assessing the quality of the performance of the colleges of education*'. The identification of policy problem is separately examined in the subsequent part.

The three ex-officials of the NCTE, whose accounts are consistent, explained developments after initiation as follows. After the discussion among the chairpersons, the NCTE National Committee chairperson approached the NAAC director, who was responsive to the idea. The NCTE did not consult any other organisation including the parent ministry of the Ministry of Human Resource Development (MHRD), as the '*NCTE was established to purview the quality of teacher education. It was the responsibility of NCTE to see whether quality of teacher education is maintained in the country*', and therefore the '*NCTE itself could take the decision*' (NCTE1, senior official, NCTE). Overall, the accounts of the NCTE interviewees seem to emphasise the NCTE's primary role in this initiative. This may suggest that it was important for the NCTE to take credit for this action. Moreover, their perception of having complete authority to formulate a policy without consulting the MHRD is an important point that is discussed later.

The above account of the NCTE interviewees is largely consistent with that of the NAAC official. NAAC1 confirmed that the NCTE approached the NAAC, but provided additional background information that led to the NCTE's initiative. NAAC1 asserts that the MHRD's interest was behind the NCTE's action. According to NAAC1, there was a committee commissioned by the MHRD to review the District Institutes of Education and Training (DIET), which prepare elementary teachers, to look into measures to improve quality of the DIETs. The NCTE coordinated this committee's work, and the committee members visited the NAAC to discuss the matter. NAAC1 explains in a matter-of-fact tone the background of the initiation:

> It is not the initiative from NCTE per se, but it was the outcome of the recommendations of a review committee. (…) Because the NCTE was really

> struggling on issues of quality parameters and all, and then they felt at one point of time, they felt that, when they were visiting Bangalore, they were looking for an organisation who can help the NCTE to look at issues of quality. (…) So that's how this NAAC-NCTE eh, ah, rather this committee only brought these two organisations together. Means, they talked to both heads of offices, and said 'why don't you talk to each other and see that something happens'. (…) So it was part of the recommendations of the committee, then which was further taken ahead. (NAAC1, senior official, NAAC)

Unfortunately, the report from the said committee was confidential and inaccessible. It, however, can be inferred that the MHRD had enough of an interest in the quality and improvement of TEIs at that time to form the committee, and the review of the DIETs identified issues with the quality of TE, to which the committee "recommended" that the NCTE responds. NCTE3 also confirms the felt-interest and pressure from the MHRD at that time for the NCTE to act to improve TE, which NCTE3 describes as if the MHRD was telling the NCTE '*You take your decision, whether you want to do it on your own or you want to give this assignment to somebody else*' (NCTE3, senior official, NCTE). This indicates that the intention of the MHRD was communicated but the choice of measures was left with the NCTE. The description of NCTE3 seems consistent with the above quote from NAAC1.

In summary, although the MHRD did not directly initiate this policy formulation process and the NCTE interviewees perceive that it has strong authority regarding TE in India and did not consult the MHRD, it can be argued that the MHRD's concern over the quality of TE made the NCTE begin the policy discussion. As Foucault (2007) argues, in order for something to be governable and reformed, or for it to be imagined as in need of reform, it needs to be made first into a problem. In this case, the policy discourse seems to have been shaped under the influence of the MHRD and its concern and the commission seems to have constructed the *problem* for which the NCTE needed to respond. Since understanding how the policy problem is constructed is important to examine the initial stage of policy-making, the next part further investigates it.

5.2.2 The policy problem: felt need of assessing performance

First, it is important to point out that the MoU or other official document obtained during the data collection do not define the specific problem the policy was created to address. Moreover, no interviewee recalls discussions about specific policy problems during the policy-making process. Although problem identification is often suggested as a first stage of the policy-making, not specifying it is not atypical in reality. The incremental approach to public policy developed by Lindblom argues that problems are often addressed without

ever being fully defined, and critiques rational model of policy-making as unrealistic (Hayes, 2013; Lindblom, 1979, 1959).

Notwithstanding this, I attempt to unpack the policy problem using the interview data. Analysis of the interview responses indicates that the majority of interviewees strongly believed that it was necessary to introduce the NCTE-NAAC accreditation. The quote in the previous part describes the need as '*a need for assessing the quality of the performance of the colleges of education*' (NCTE1, senior official, NCTE). The other interviewees' immediate responses regarding the policy problems were expressed in a similar manner such as: '*There was a need for an arrangement looking into deeper aspects of quality of teacher education*' (NAAC2, consultant, NAAC). Both quotes stress the need of assessing the 'quality' or 'performance' of the colleges of education, which suggests it was considered absent at that time. This part further attempts to unpack this felt need to assess quality as the core policy problem of the time.

To better understand the perceived problems at that time, the interviewees were asked to explain more about their understanding of the reasons why it was necessary to introduce the NCTE-NAAC accreditation in 2002. Analysis indicates that the problems identified by the interviewees relate to their dissatisfaction with the then (pre-2002) assessment system which made them feel the need to introduce a new one. The perceived problems with the pre-2002 system broadly fall into two related categories: (i) the implementation gap, and (ii) inadequate assessment criteria. In addition, (iii) their expectation of the new NCTE-NAAC accreditation is examined as it highlights what the interviewees perceive missing in the pre-2002 system. They are discussed below.

(i) Problem with pre-2002 system 1: implementation gap
The interview data indicate strong dissatisfaction with the implementation status of the pre-2002 TE assessment and regulation. Before 2002, two main actors had authority and responsibility to ensure quality of TEIs: universities through the affiliation system and the NCTE through various regulations including 'recognition' (initial permit of operation). Both the affiliation system and the NCTE recognition were obligatory for TE colleges to operate. They awarded affiliation/recognition based on the result of assessment using pre-determined criteria. (see Chapter 2 for details).

Interview data indicate strong doubt of the effectiveness of the affiliation system to ensure quality of TEIs: '*universities could not monitor it [quality of TEIs], because of the political pressures, because of the economic pressures, because of the other reasons,*

universities could not monitor it' (NCTE2, senior official, NCTE); '*[universities'] academic influence is very minimal, very marginal'* (TEexpert2, principal, research institute). The literature review substantiates that this concern was known at that time. Doubt about the effectiveness of the affiliation system because of the increase in the number of affiliated colleges was expressed (Singh, 2003). For instance, there were universities with more than 400 affiliated colleges, while the UGC recommended that there should be less than 30 (Stella, 2002). It appears that it was difficult to appropriately implement the affiliation systems where affiliating universities were supposed to ensure the quality of colleges in the vicinity through close monitoring.

Similarly, according to the interviewees, while the NCTE recognition was mandatory to open new courses, the NCTE did not regularly monitor TEIs once they were in operation. All three NCTE interviewees explained that the NCTE was not responsible for the monitoring task. For example, NCTE1 explains that '*once the college was established, the functioning, academic programmes, how they function and all that, did not come under the purview of NCTE*' (NCTE1, senior official, NCTE); and NCTE2 states '*Monitoring is a function of universities'* (NCTE2, senior official, NCTE). However, as reviewed in Chapter 2, the National Council for Teacher Education Act, 1993 (No. 73 of 1993) provides the organisation with the authority and responsibility to monitor the quality of recognised institutions. The NCTE is also given a power to withdraw the recognition in case of contravention (NCTE Act, Section 17). Asked about these sections, NCTE3 explains that inspection of existing TEIs was done only '*anytime there is a complaint*' (NCTE3, senior official, NCTE). The following account seems to summaries the operation of the NCTE:

> In fact, NCTE is not monitoring. This is where all the problems come in. Certain section of NCTE is given authority to go to colleges and find out norm fulfilment. It is not happening. There is mandatory inspection, but there are thousands of colleges. Only when people complain, NCTE does monitoring. (NAAC2, consultant, NAAC)

Overall, while the pre-2002 TE governance system gave both universities and the NCTE the authority to monitor the operation of TE colleges as well as to grant and withdraw permission to operate, the interviewees perceive that implementation was unsatisfactory in ensuring the quality of TE. Their perception seems to be an important factor that led them to believe that there was a need for a new mechanism.

(ii) Problem pre-2002 system 2: inadequate assessment criteria
In addition to the interviewees' dissatisfaction with the ineffective implementation of the pre-2002 TE regulation mechanisms, i.e. the affiliation system and the NCTE recognition,

the interview data also indicates discontent about the assessment criteria of these systems. The interviewees consider the affiliation criteria as well as the NCTE *norms and standards* inadequate to assess and assure the quality of TEIs. The points of complaint are similar for both sets of criteria as explained below. NAAC2 describes the university affiliation criteria as '*They are more concerned with infrastructure and other requirements of structure that is staff, students, so this kind of thing*' (NAAC2, consultant, NAAC). NCTE1 describes the NCTE norms and standards as follows:

> It was the norm in the form of a checklist. How many rooms you have, how many teachers you have, how many equipment physically verifiable. The performance of the colleges was not monitored from the point of quality. (…) There was no one looks after, eh, check the quality of the education offered. (NCTE1, senior official, NCTE)

These comments suggest the pre-2002 assessment systems were perceived as input focused. The following claim seems to summarise the dissatisfaction with the pre-2002 system and expectation for the new system:

> Real issues of quality relating to curriculum, and its transaction was not there [pre-2002 system]. Thus, there was a need for an arrangement looking into deeper aspects of quality of teacher education, other than broader superficial infrastructure, staff and all this. (NAAC2, consultant, NAAC)

It is observed that the interviewees consider the input-focused pre-2002 mechanisms as superficial and insufficient to assess the quality of education, and therefore, there was a need to examine '*deeper aspects of quality of teacher education*'. This belief seems to explain their perception of the need to introduce a new assessment system.

(iii) Expectation from a new system

This part examines what the interviewees expected from the introduction of accreditation system, as it may highlight what was perceived missing from the pre-2002 system. In other words, this part tries to unpack the interviewees' felt-need for assessing '*deeper aspects of quality of teacher education*'. The interviewees' narrative was consistent in explaining that the pre-2002 assessment criteria were superficial and they wanted to introduce an accreditation system that would generate information about quality and performance of TEIs. For example, NCTE2 explains that '*Quality is based on the process, process means teaching, learning, lesson plans, should I say making teachers. Quality means this. This part can be done only by accreditation*' (NCTE2, senior official, NCTE). A point of comparison often made by the interviewees is that accreditation gives more feedback while the pre-2002 mechanisms only gave pass or fail result. For instance, NAAC2 states '*for example university affiliation – they say they are affiliated or not. NCTE also say recognised or not. But NAAC say how good you are in terms of actual*

performance, quality indicators' (NAAC2, consultant, NAAC). In summary, while the pre-2002 assessment criteria were described as input-focused by the interviewees, accreditation was expected to examine the process and generate more feedback to TEIs on their performance.

Furthermore, the analysis of interview data indicates three related explanations of effects expected from such feedback on the performance of TEIs. First, the feedback from the assessment is believed to lead to improvement of assessed TEIs. For instance, NCTE3 explains as follows:

> You see, when you dress up and you stand in front of your mirror - why do you stand? Because you want to improve! Isn't it? In your makeup - you like to see whether it is okay or not. If you're not standing in front of [mirror], you can't improve. So, this NAAC is like a mirror where the complete college or complete university takes it up. So, they can see themselves where to improve, where not to improve, where to continue with the same thing. (NCTE3, senior official, NCTE)

Second, comparison with other TEIs through grading of accreditation status (A, B, C) is believed to create awareness and competition that leads to motivation for improvement. NAAC1 explains:

> To bring more in some sort of seriousness and awareness of quality assurance. (…) once they experience it, then every institution, they feel it will be a sort of competition among each other. Yes, we do grading and they don't want B, C grade – otherwise, students won't come. You know, it is sort of branding for them. They take it as branding. So they try to do something. (NAAC1, senior official, NAAC)

A similar idea is expressed by NAAC2 as follows:

> It is the motivation factor. If the institution is given C, they like to improve. If an institution gets A, they excel. This is a process of motivating institutions for better performance. (…) Because any institutions that want to tell the public they are A grade, or B grade, so the grading and comparability of performance of counterpart institutions. (…) One, address deeper issue of quality, and also rank institutions in terms of performance. Ranking of institutions. (NAAC2, consultant, NAAC)

Third is recognition of good performing institutions. While the first two points are mentioned by many interviewees, this point is mentioned by two interviewees only. NCTE1 explains as follows:

> This exercise intended to make good performing institutions to come forward voluntarily (…) so colleges which are doing well, we thought they should get themselves accredited, and get recognition. This was the objective of this effort by NCTE also. Because we wanted institutions come forward to showcase their good performance. (NCTE1, senior official, NCTE)

The interviewees often mentioned several points from the above three, as they are not mutually exclusive. Their accounts seem generally consistent. While *accountability* and *improvement* have been traditionally considered two major purposes of EQA (see

Chapter 3), in this case, the interviewees seem to have a stronger expectation for *improvement* from introducing the NCTE-NAAC accreditation.

Discussion on the above three points

The analysis reveals the interviewees' dissatisfaction with the implementation gap and inadequate assessment criteria of the pre-2002 TE assessment and regulation system led them to believe in the need to introduce an accreditation system which is expected to assess '*deeper aspects of quality'.* Their responses to the problems and expectation explained above are further discussed.

Firstly, although many interviewees framed their dissatisfaction with the pre-2002 system in relation to ineffective monitoring of the quality of TEIs, it seems clear that the underlying and more fundamental issue was the unsatisfactory quality of the TEIs of that time. This is also supported by the understanding that improvement of TEIs was the expected outcome of introducing an accreditation system. It seems that the interviewees framed the problems in the way that fit the adopted solution, i.e. introduction of an accreditation system. This can be explained by the claim that both policy problems and responses are often considered simultaneously (Hayes, 2013; Lindblom, 1979, 1959). This confirms the importance of questioning definitions of policy problem and interrogating the construction of a problem since both problems and solutions are given shape in policy discourse (Bacchi, 1999; Goodwin, 1996; Stone, 2012).

Secondly, the dissatisfaction of the interviewees with the pre-2002 assessment criteria may be explained by the shift of discourses and concept of managing *quality* over time, rather than the fault of the pre-2002 systems. The input-focused criteria of the pre-2002 systems seem to reflect the discourse of the traditional HE governance that is characterised by an autonomy based on trust in professionals and a public service ethic, and democratic governance in line with the classical liberal notion of freedom of the individual (Olssen and Peters, 2005). Following this model, the assumptions of the pre-2002 systems may have been that external assessment focused on ensuring appropriate conditions through checking input requirements while teaching/learning process were internally assured by professional judgement of academics. Professional self-regulation seems to have been trusted in the pre-2002 systems.

The interviewees' dissatisfaction with such pre-2002 systems appears to indicate that by 2002 the interviewees had believed that the traditional trust in professionals was insufficient and the quality needed to be assessed and managed. This seems to reflect

neoliberal discourse and increasing attention to *quality* observed in the global discourse of HE governance since the 1980s, as discussed in the literature review chapter. The context chapter discusses that the neoliberal reform had occurred in India since the 1990s. The increasing demand for public accountability stresses performativity, as evidenced by the measured outputs against measurable quality standards, which legitimises regulations to ensure standards of performance including rigorous measurement and evaluation (Martin and Stella, 2007; Olssen and Peters, 2005; Ranson, 2003). The interviewee's felt-need for assessing '*quality of the performance*' and '*deeper aspects of quality*' appear to have been shaped in this neoliberal discourse. It indicates that discourses of the time frame the view of people in a certain way, and with the shift of discourses over time, the old system may have been regarded inadequate. The analysis confirms that policy is the product of discourses of the period and highlights the importance of understanding discourses behind policies.

5.2.3 Key context: concern over quality of blooming private TEIs

To conclude the discussion on the agenda setting stage, the key context of that time is examined. When asked further about the need to assess *quality,* the interviewees consistently indicate the concern over the quality of TE as the broad important context of that time. They suggest that there had been concerns over the quality of TE in the context of blooming private TE colleges. NAAC1 explains the reasons behind the MoU referring to this concern:

> Because NCTE was really struggling on issues of quality parameters and all (…) the NAAC has the expertise for quality assurance, and NCTE was struggling with the challenges of blooming teacher education institutions. (NAAC1, senior official, NAAC)

As NAAC1 describes '*the challenges of blooming teacher education institutions*' in the above quote, many interview respondents stated that the concern over the quality of TE was heightened during the period of MoU agreement due to growing private TE providers in India. The growth is substantiated by data. The figure below created from the data of *NCTE Annual Reports* shows the number of TEIs offering B.Ed. courses over the years. During the five years from 1997 to 2002, the average annual increase was 20 colleges (from 812 to 911 in five years). The annual increase of the following two years is 208 (2002-2003) and 373 (2003-2004) respectively, which is more than ten times compared to the 1997-2002 period. The data suggests 2002, the year the MoU was signed, marks the start of the rapid growth. Unfortunately, the *NCTE Annual Reports* does not segregate the number of public and private institutions.
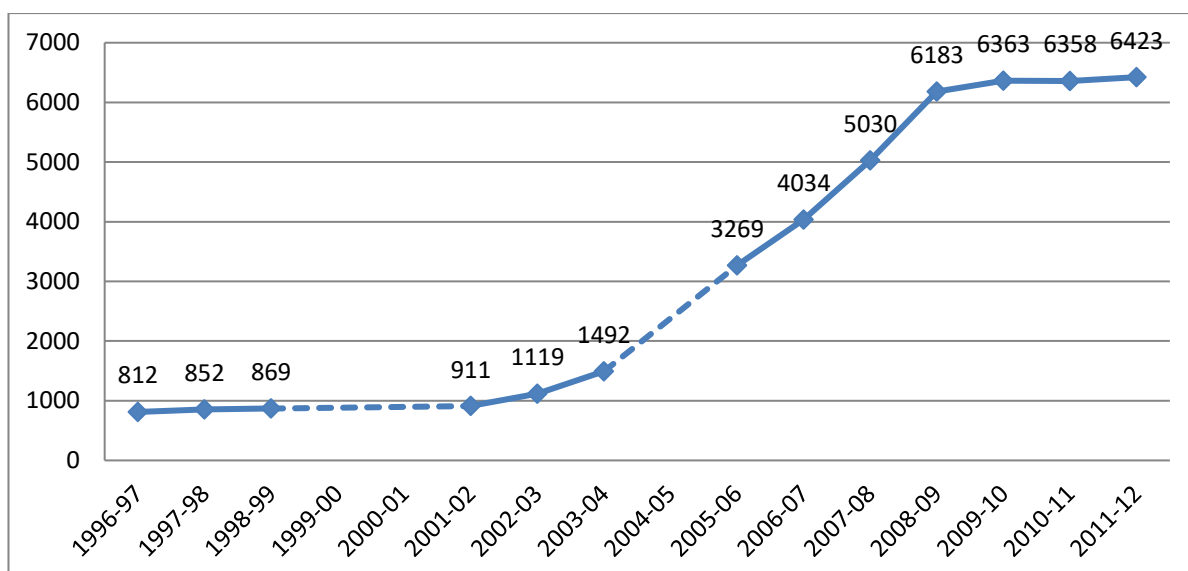
Figure 8: Number of TEIs offering B.Ed. courses

Source: (NCTE, 2012, 2011b, 1997, 2010, 2009c, 2008, 2007, 2004, 2003b, 1999, 1998)

The quote below from the NCTE's *Annual Report 2003-2004* substantiates the analysis:

> There has been an <u>unprecedented increase in the number of institutions</u> during <u>the last few years</u> seeking recognition for starting teacher education courses, <u>particularly for opening B.Ed. training courses</u> for secondary level (…) During the year 2003-04, NCTE received 4,032 applications, which alone is more than the cumulative number of teacher education institutions in the country, that is, 3,160 recognized by the NCTE since its inception. <u>The majority of such applications are from private institutions.</u> This has put the Regional Committee offices and their functioning under a lot of strain. (NCTE, 2004, p. 2) [underline added]

The report shows the increase in the number of TEIs applying for opening new B.Ed. courses started around 2000 (as it had been happening '*during the last few years'* at the time of 2003-04), and confirms that the majority of applications are from private institutions. The fact that it is on the first page of the NCTE annual report suggests that it was a well-recognised phenomenon. The slight gap between the indicated start of an increase in application (around 2000) and actual increase of reported numbers of recognised courses in Figure 8 (around 2002) can be explained by the time it requires for processing an application. After TEIs apply the NCTE for permission or *recognition*, the NCTE conducts a document review and site inspection for each application.

The peak of growth was during the subsequent five years from 2004 to 2009, with an average annual growth of as many as 938 colleges. The growth levelled off after 2009. NAAC2 explains the reason behind the rapid increase during the decade of 2000 as follows:

> At some point in the history of NCTE, there was an explosive demand for teachers because of the implementation of the national schemes like *Sarva Shiksha Abhiyan*. There was a need for the recruitment of teachers in thousands and thousands. Millions of teachers were required. This was a felt need. And the requirement was they have to have teacher education qualifications. Now someone sensed the demand (…) So teacher education institutions came in huge numbers. (NAAC2, consultant, NAAC)

As explained in Chapter 2*, Sarva Shiksha Abhiyan* (SSA) launched in 2000-2001, was a national flagship programme of the government for the universal elementary education which 'aims to achieve universal enrolment of all children in the age group 6-14 years in elementary education, ensuring all children learn at grade appropriate level' (MHRD, 2018). Although the minimum requirement for elementary teachers (G1-8) at that time was diploma, a B.Ed. was one of the options to become elementary teachers (see appendix 1 for the qualification of teachers). Moreover, it is safe to assume that the increased enrolment in and completion of elementary education by SSA would indicate the subsequent increase in the number of students transiting to secondary education, which required a B.Ed. as the minimum qualification of teachers. Launching SSA in 2000-2001 also seems to match the timeframe to explain the start of the increase in TEIs applying for opening new courses around 2000.

To understand the significance of the SSA, it may be useful to add background information. The Supreme Court of India, in its judgment in the J. P. Unnikrishnan v. the State of Andhra Pradesh case (A.I.R. 1993 SC 2178), held that children under the age of 14 have the fundamental right to free education. Spurred by this judgment, successive governments from 1993 have worked towards bringing a constitutional amendment to make education a fundamental right. This led to the 86th amendment to the Constitution in December 2002, which argues within Article 21A for the provision of free compulsory education to all those under 14. This Article 21A of the Constitution was subsequently enacted as *The Right of Children to Free and Compulsory Education Act* or Right to Education Act (RTE) on 4 August 2009. The SSA needs to be located as a part of this evolution. It was a government flagship programme to operationalise free and compulsory elementary education partly as a result of this judgement.

Given the context of the time, it is not surprising that private TE providers took business opportunities, as explained by NAAC2. This also provides the context of the previously-mentioned committee on TE commissioned by the MHRD. The contextual examination of this part indicates that it was the concerns with rapid growth and quality of private TEIs

that made the government feel the need to introduce an additional measure to ensure the quality of TE provides, which led to the NCTE-NAAC accreditation.

5.3   Negotiation for policy text production in 2002

The agenda setting stage is followed by the 'policy formulation' stage where solutions to problems were shaped and argued (Althaus et al., 2012; Anderson, 2014). This section discusses this policy formulation stage that resulted in the MoU between the NCTE and NAAC to start accreditation of TE in India. It first examines the policy text production process (5.3.1). It then discusses key issues from this phase, absence of exploring policy options (5.3.2) and examination of organisational reasons behind the agreement (5.3.3).

5.3.1   The MoU production process in 2002

This section looks at interviewees' accounts on the process of policy text production, i.e. negotiation and preparation between the two organisations that resulted in the MoU in 2002 that started the accreditation of TE in India. This process involved six or seven people (although interviewees did not agree on the numbers): the NCTE was represented by three or four senior members including two NCTE chairpersons (one national and one regional) and board member(s) while the NAAC was represented by three senior members including the NAAC director, one senior staff, and one TE expert consultant. Among them, I interviewed four people (NCTE1, NCTE2, NAAC1, NAAC2), three of whom were also involved with the earlier initiation phase (NCTE1, NCTE2, NAAC1). The NAAC requested a reputed national TE expert, NAAC2, to be a part of its team as a consultant, who was in fact requested by both organisations to be their consultant for this negotiation process and chose to work for the NAAC because of a strong request from the NAAC. The small number of people involved in policy formulation is a notable point.

The accounts of the four interviewees on the process to reach the MoU are largely consistent. They claimed that after the NCTE chairperson approached the NAAC director, both heads of the offices instantly agreed to proceed, and the NAAC obtained internal consent from its governing board of council. Afterwards, there were two preparation meetings between the two organisations to discuss the terms of the agreement, followed by one official meeting to sign the MoU. The two preparation meetings were held early in 2002, and the last meeting for the formal MoU agreement was held on the 16 August, 2002. This is a short process for a policy-text production.

The interviewees describe the negotiation and discussion in the meetings as follows. The MoU was first drafted by the NCTE, which was discussed with the NAAC during the meetings. This seems to confirm that the NCTE side took the initiative for the discussion. There were two main discussion points in these preparation meetings. The first was the duration of the MoU of three or five years. The NCTE wanted the MoU as a timebound agreement that was subject to periodic review. Second was the development of TE-specific assessment criteria for accreditation. This was the most important point for the NCTE, according to the interviewees, because the then assessment criteria of the NAAC designed for general HEI was not appropriate to assess the quality of TE. The NCTE requested to develop new criteria, which was accepted by the NAAC. Then the agreement became official in the form of the MoU between the NCTE and the NAAC. The duration was decided to be three years, and the criteria development was noted in the MoU as 'NAAC and NCTE would jointly constitute a National Consultative Committee to evolve and review norms and standards for accreditation of teacher education programmes' (2002, p. 2). NAAC1 was appointed as coordinator for this agreement. The interviewees recall the process of negotiation to reach an agreement as smooth and contest-free.

The process described by the interviewees indicates a top-down policy-making process. Starting policy discussion was "suggested" by the MHRD, as Section 5.2.1 found, and the policy text formulation involved only a small number of senior officials from two public agencies and their consultant. The person who has a voice in policy-making is crucial as it means their views are given legitimacy, as Ball (1993, p. 14) argues: 'Discourses are about what can be said, and thought, but also about who can speak, when, where, and with what authority'. In this case, the two agencies formulated the policy text without consultation with other key stakeholders such as the parent ministry of the MHRD that should have a broader view of education, practitioners that had knowledge of the reality, affiliating universities that had existing TE regulation mechanism, state school education boards that had a stake in TE, and students and parents who were potential beneficiaries of the policy outcome. Instead, these two specialised public agencies considered having sufficient authority to formulate the policy. This point is further examined in the discussion chapter.

The main discussions in the preparatory meetings according to the interviewees were mainly regarding mechanism to operationalise the accreditation as described above, and there was no recollection of negotiation on more fundamental policy issues such as objectives or expected outcome. It suggests that the focus of the MoU production was

on administrative and technical matters and not on in-depth policy dialogue concerning the role of accreditation in Indian TE. This process produced a brief MoU of four-page document, consisting mostly of general statements. This brief form was chosen intentionally. NAAC1 explains that:

> It's a brief MoU because they did not create… you know, because the roles and responsibilities, and what will be the legal implications, so we thought that broadly let us have an MoU for accrediting teacher education institutions. (…) there was no condition imposed either on NCTE or NAAC side. (NAAC1, senior official, NAAC)

The quote indicates that the focus of the MoU production was on formalising the inter-agency collaboration on starting accreditation, and intentionally avoided creating binding responsibilities for the agencies. This may be seen as a lack of intent to fully implement the policy. This may explain why key factors seem missing in this policy-making process including efforts to ensure follow-through of the policy implementation such as specifying the roles and responsibilities, and focus on results such as policy outcome. The MoU seemed to be prepared to serve the purpose to '*broadly have an MoU for accrediting teacher education institutions*', as NAAC1 describes. However, this approach may risk leaving key issues such as objectives or vision of TE unclarified, thus, leaving room for different interpretations. I revisit this point in the next chapter when analysing the content of the agreement.

Overall, while the process indicates a strong intention of both agencies to reach an agreement, contrastingly it does not suggest a strong intent to ensure full implementation of the policy. This seems to have shaped the policy text production process as a short and contest-free process producing a brief MoU without specifics, and the process which involved only a small number of government officials without stakeholder consultation that would ensure better implementation. The relation between policy intent and the policy text production process is further discussed in the discussion chapter.

5.3.2 Absence of exploring policy options

In analysing policy formulation described by the interviewees, it was noticed that exploration of policy options did not happen. In theory, the policy formulation stage involves exploring a variety of options or alternative courses of action available for addressing the problem (Althaus et al., 2012; Anderson, 2014). In this case, however, other measures for addressing the policy problem were not explored and accreditation was practically predetermined as a new measure without discussion. The interviewees indicate precedents as the reason for choosing accreditation without exploring

alternatives, e.g. '*Because the accreditation was already there*' (NCTE3, senior official, NCTE). NAAC2 similarly explains:

> Because at that time there are already some instances in parallel. For example, All India Council for Technical Education, they had their own accreditation. Indian medical council, they had their own things. Likewise, they thought NCTE should have its own. (NAAC2, consultant, NAAC)

The document search confirms that All India Council for Technical Education, the equivalent of the NCTE in technical education, established its accreditation body, the National Board of Accreditation, in 1994 (NBA, 2020).

Besides, it became clear that the NCTE was already familiar with the concept of accreditation. The NAAC and the MHRD convened two meetings in 1997 and 1998 with the heads of professional bodies including the NCTE to promote collaborative assessment for accrediting HEIs (Antony & Gnanam, 2003, p.112). In addition, NAAC2 states at the introduction before the interview that a few years prior to the 2002 MoU, the NCTE contracted him as a TE expert to develop a project plan to establish an accreditation wing within the NCTE. According to NAAC2, the project plan was dropped due to insufficient institutional capacity to manage the heavy workload required for accreditation.

The analysis suggests that the NCTE's exploration started with accreditation as a pre-determined choice because of the precedents of other councils as well as the NCTE's pre-existing interest and knowledge about accreditation. This seems to fit the concept of incrementalism in policy-making. The incremental model argues that actors often do not possess sufficient time and information to examine all the conceivable options as called for by the rational ideal, and policies are made through typically focusing on alternatives differing only marginally from previous policies (Hayes, 2013; Lindblom, 1979, 1959). This narrow focus confines attention to options that are well understood and politically feasible (Hayes, 2013). This seems to explain the process in this study where the actors focus on one feasible option without exploring policy alternatives.

5.3.3 Strategic calculation of the NCTE and the NAAC

To conclude the examination of the policy text production phase, this part attempts to understand the reasons behind the 2002 MoU from the organisational perspectives of the NCTE and the NAAC. The previous section found that the NCTE's exploration started with accreditation as pre-determined choice. Thus, the potential options for the NCTE, according to the interviewees' understanding, were only two: either NCTE's in-house

accreditation similar to the one of other professional bodies or accreditation in collaboration with the NAAC. Interviewees (NCTE1, NCTE3, NAAC2) explained that the in-house accreditation was theoretically an option at that time, but considered unfeasible. NCTE1 explains '*NCTE itself was not in the position to start this accreditation. It is a big task and we did not have proper machinery there*' (NCTE1, senior official, NCTE). NCTE1 continues to describe the long establishment process and the workload of the NAAC, indicating that the NCTE was not in the position to do such work then. NCTE3 referred to the work the NCTE was occupied then because of the flooding applications for the NCTE recognition: '*the work which we are doing - this is too much. (…) So, we cannot have additional [work], for simple reasons*' (NCTE3, senior official, NCTE).

Moreover, for the NCTE, the status and good reputation of the NAAC seems to have helped to choose it as partner. The NCTE interviewees explain as follows:

> NAAC was established by UGC through a series of consultation. So, it was established as a very thought-of programme and all that. So the best thing for us is, we must enter into some understanding with NAAC to accredit colleges of education. (NCTE1, senior official, NCTE)

> Because NAAC was such an institution which was creating an atmosphere that could help institutions to improve upon. (NCTE3, senior official, NCTE)

In this context, the NCTE chose to collaborate with the NAAC. NAAC2 explains the decision: '*we [NCTE] do not have our own accreditation agency, so let us piggyback on NAAC, which already exists. So that is how that NCTE–NAAC MoU came into being*' (NAAC2, consultant, NAAC). This policy choice can also be explained as *incremental*, building on the existing policies.

The analysis of the NCTE choosing accreditation shows how context frames policy choices. Government's endorsement of accreditation practice in HE was clearly indicated in the existing policies. The MHRD's endorsement of the NAAC was also clear. The claims of the interviewees also indicate the NAAC was perceived by stakeholders as having a strong legitimacy. When the policymakers had processed all this contextual information, choosing accreditation and the NAAC as a partner was possibly regarded as an "obvious" option that many would support. Thus, possibly those who were involved in the policy-making did not feel the need to contemplate other options. As discussed in the literature review, meaning-making is not a neutral or natural process, where discourses create conditions which make certain things look 'natural' while silencing others, which shape policy solutions (Bacchi, 1999; Ball, 1990; Cochran-Smith et al., 2013; Goodwin, 1996; Stone, 2012). Thus, in this study, policy-makers' action, including

inaction, could be understood as their having the perception that the existing structure at that time gave preference to a certain strategy, i.e. accreditation with the NAAC. This also may have contributed to the smooth policy-formulation process discussed earlier.

On the other hand, the reason for the acceptance on the NAAC side was pragmatic. NAAC1 explains, recalling the situation at the time of the agreement: '*At that point, NAAC did not have much workload. Not many institutions, because it was voluntary, not many institutions were covering, so we were doing many promotional activities*' (NAAC1, senior official, NAAC). Other interview data and the NAAC publications from that period substantiate that the NAAC was conducting promotional activities for various organisations, including professional bodies and universities to promote NAAC accreditation (Antony and Gnanam, 2003). NAAC accreditation was not made compulsory for years after the establishment, and despite the extensive efforts taken to disseminate NAAC accreditation through a number of awareness activities, many institutions were still hesitant to apply for accreditation. As of December 2002, 70 out of 160 universities (44%) and 226 out of 12,600 colleges (less than 2%) had been accredited (Stella and Gnanam, 2003, p. 54). In this situation, obviously, the suggestion of collaboration from the NCTE was nothing but a welcome offer for the NAAC. The choice of collaboration for the NAAC may be explained as *pragmatic*. Overall, there were obvious benefits for both organisations for the collaboration, which NAAC1 describes succinctly as a '*win-win situation for both organisations'* (NAAC1, senior official, NAAC).

5.4 Development after the policy formulation

This section chronologically looks into the period after the agreement of the MoU in 2002. The MoU was time-bound and it was renewed several times, but the MoU remained largely identical. However, some events after 2002 seemed to have altered the meaning of the NCTE-NAAC accreditation policy. To appreciate the policy construction from the broader perspective, this section reviews key events and change in the related policies that seemed to have re-shaped the significance of the NCTE-NAAC accreditation policy.

(i) From 2002 to 2009: slow operationalisation amid mushrooming private TEIs

The table below captures the main events described in this part.

Table 15: Key events referred in this section

Date	Event
2002	NAAC - NCTE MoU (1st)
6 Sep 2005	NAAC - NCTE MoU (2nd)
2005-2007	Development of indicators by NAAC-COL

2007	Development of criteria for TE by NAAC
2007	Review Committee commissioned by the MHRD
7 Oct 2008	NAAC - NCTE MoU (3rd)

Source: researcher's compilation

The development after the 2002 MoU agreement was slow. According to the interview data, the National Consultative Committee was created out of the MoU with 13 members. Its main task was to evolve and review norms and standards for accreditation of TE programmes (NCTE and NAAC, 2002). *The NCTE Annual Reports* 2007-08 confirms that the National Consultative Committee was constituted after the 2005 MoU, but the first meeting was held on 24th September 2007 (NCTE, 2008, p. 6). According to NAAC3, who is a former Committee member, the Committee meetings were held only once or twice a year with little tangible progress (NAAC3, TE expert, NAAC). *The NCTE Annual Reports* 2006-07 also states that 'little progress regarding collaboration with NAAC during 2006-07 could be effected' (NCTE, 2007, p. 6).

According to NAAC1, the main challenge the NAAC had at this stage was to develop accreditation criteria specific for TE, which was the main discussion point during the MoU negotiation meetings. The NAAC was expected to lead this process as an accreditation expert agency, but it did not have sufficient expertise on specific disciplines, including in TE. The coordinator of the agreement, NAAC1, discussed this challenging activity with an organisation with which the NAAC already had technical collaboration, the Commonwealth of Learning (COL). In 2005, the COL agreed to provide support to develop, not the NAAC specific indicators, but a generic toolkit for QA of TE. The NAAC1 explains that '*It began as an academic exercise*' (NAAC1, senior official, NAAC). The COL and the NAAC invited teacher educators from various countries to a workshop in India and published the results as *Quality indicators for teacher education* (Menon et al., 2007). It contains generic indicators to assess TE, which '*became a part of implementation strategy of the MoU*' (NAAC1, senior official, NAAC). The NAAC indicators for TE informed by this publication were subsequently published in 2007, five years after the MoU agreement. (The NAAC indicators are further examined in Chapter 6.) The MoU was revised twice during this period in 2005 and 2008 and the content remains almost identical.

While the NAAC was still developing the TE specific criteria, it started accrediting TE providers soon after the 2002 MoU using temporary accreditation criteria. Unfortunately, the temporary criteria could not be obtained during the fieldwork. The number of applications from TEIs during the initial period cannot be verified in the NAAC data for

the NAAC records do not differentiate accredited TEIs from other types of HEIs. Interview data regarding the initial responses from TEIs varies from '*very poor*' (NCTE1, senior official, NCTE) to '*very good*' (NCTE3, senior official, NCTE). Further analysis of interview data that provide more details seems to suggest that it was not good at the beginning, as NCTE1 explains '*The number of [applications] – initially it was left voluntary. (…) So the response was poor in the initial stage*' (NCTE1, senior official, NCTE). A voluntary system is argued to work well only when there are strong incentives for institutions to apply for EQA process (IIEP, 2006), but there is no indication that such incentives existed at that time in India. However, the response appears to have improved in some regions as NCTE3 explains: '*You know, there were many of the states in the South. They came forward for the accreditation. Not people from the North.*' In the literature search, a book by Stella and Gnanam (2004) supporting this claim was found, which write that some state governments in the South directed their colleges to obtain the NCTE-NAAC accreditation.

From 2002 to 2009, the period this part discusses, is the same period the number of TEIs mushroomed in response to the demand for teachers (see Figure 8). Section 5.2.3 suggests that the concern over the increasing private TEIs was shared in the early 2000s, which was the key context of the introduction of the NCTE-NAAC accreditation in 2002. However, the analysis in this part suggests the operationalisation of the NCTE-NAAC accreditation was slow to respond to the concern. There is little indication that the NCTE-NAAC accreditation or any other regulatory mechanism functioned as an effective regulation measure for ensuring the quality of TE providers during this period. It seems that ensuring the supply of teachers to meet the demand was prioritised and the concern kept growing during this period. NAAC2 describes this period as follows:

> That was the failure of the government, failure of NCTE, under the demand of the market forces. The resulting situation was so many colleges without infrastructure, basic necessities, they sprung up. (…) So this is what happened. For 8 years, 8 to 10 years, there was total devastation. (NAAC2, consultant, NAAC)

Rather than regulating mushrooming private institutions, the government was perceived as prioritising the access expansion during this period. The NAAC2 explains:

> The government also showed relaxation in starting business institutions, because they saw the opportunity to please so many people to set up institutions. It was patronage, political patronage. So, during this short period, the number of institutions rose by 100% or 200%. (NAAC2, consultant, NAAC)

According to the interview data, relaxation of rules during this period included stopping requesting TEIs to submit Non-Objection Certificate (NOC) from concerned state

government when applying for NCTE recognition (TEexpert2, principal, research institute). This claim is substantiated by the analysis of the NCTE Regulation (see appendix 1 for details). Another relaxation is the NCTE's lowering minimum qualification of teacher educator from M.Ed. to B.Ed. in 2005 (NAAC2, consultant, NAAC), which is substantiated by the NCTE notification (NCTE, 2005) (No. 49-29/2005 dated December 28 2005). The notification states that due to acute shortage of candidates for appointment to teaching posts in TEIs, the NCTE has decided to grant certain relaxation in this regard for three years. This relaxation possibly contributed to the largest growth of B.Ed. courses during the period of 2006-2009, as '*It helped many private institutions because they were not able to get qualified teacher educators*' (NCTE1, senior official, NCTE). As a result, '*A large number of institutions came up for teacher education*' (NCTE2, senior official, NCTE); '*Because they realised, these private people, management people realised that teacher education is one area where they could commercialise the whole education. Commercialise the whole system*' (NCTE1, senior official, NCTE).

The MHRD in 2007 created a Review Committee under the Chairmanship of Sudeep Banerjee, former Secretary, MHRD, to conduct an in-depth study of the function of the NCTE in the wake of numerous complaints about the NCTE. In its report, the Committee concludes that the NCTE paid scant attention to the quality of training and curriculum while fostering privatisation and unplanned proliferation of TEIs (Singh, 2016). The difficulty of this period seems to be balancing between responding to the increasing demand of teachers and ensuring the quality of growing TEIs.

(ii) NCTE regulation amendment in 2009: the move to partially mandatory accreditation

The table below captures the main events described in this part.

Table 16: Key events referred in this section

Date	Event
Jan 2009	Bombay High Court litigation case against NCTE
Aug 2009	NCTE Regulation amendment
2009-2010	Growth of TEIs levelled off

Source: researcher's compilation

The NCTE-NAAC accreditation altered its meaning in 2009 through the changes in the related policy. In the *National Council for Teacher Education (Recognition Norms & Procedure) Regulations, 2009*, which was published in the Gazette of India dated 31st

August 2009 (No. F. 51-1/2009-NCTE), the NCTE made amendments on the conditions for grant of recognition for operating TE courses. There are two sections concerning the NCTE-NAAC accreditation: Section 4 reveals that minimum NAAC B Grade is mandatory for applying for new courses of the M.Ed. and M.P.Ed., and enhancement of intake in B.Ed., B.P.Ed., M.Ed., M.PE.; Section 5 states that institutions granted new courses and additional intake listed in the Section 4 after the 13th January 2006 had to get the NAAC accreditation with minimum Grade B before 1st April 2010, failing which the recognition granted to the institutions would be withdrawn. Although the previous regulations also require the NAAC accreditation for additional intake of B.Ed. and Bachelor of Physical Education (B.P.Ed.), the 2009 regulation made the requirement more significant by extending it for opening new courses and also M.Ed. and M.P.Ed. courses (see details in appendix 1). This amendment made the NCTE-NAAC accreditation more important, moving toward semi-compulsory. Around the same time, from 2009, the previously mentioned three-year period of lowering minimum qualification of teacher educator (No. 49-29/2005 dated December 28 2005) expired.

NAAC2 describes the situation that led to this amendment in 2009 as below. This needs to be understood in the backdrop of the mounting concern over private TEIs and the failure of the NCTE to regulate, as described earlier:

> NCTE was giving it [recognition] freely. At some point, it was noticed that this has gone too far and there has to be some check. Because many institutions are running M.Ed. course without infrastructure, without staff, and many institutions have two hundred students without proper [inaudible]. And it was noticed by NCTE that sanction of additional intake and sanction of programme, they have been done indiscriminately. It has to be stopped. So the one check they could, which was in their control was, to make NAAC accreditation requirement. (NAAC2, consultant, NAAC)

The NAAC1 similarly described the problematic situation at that time that resulted in the change of the NCTE Regulation in 2009:

> Most of these institutions started behaving like for-profit institutions. So, they wanted to increase the number of seats, student places, wanted to start M.Ed. programmes, so NCTE was struggling to assess these institutions before giving them more numbers. So just based on the application details, they used to give more numbers whatever they provided. Then this created havoc. Then they said OK, you should have mid-level accreditation – B – then only they will be able to apply for it. (NAAC1, senior official, NAAC)

The analysis of the above information suggests that in the context of the mounting concern over the quality of mushrooming TEIs and failure of the NCTE to effectively regulate them, the NCTE strengthened the Regulation in August 2009, and one of the measures was making the NCTE-NAAC accreditation semi-mandatory. In addition to the

general concern, there is one notable incident that may have triggered this amendment. It is the January 2009 litigation case, in which the Bombay High Court reversed recognition of 291 TE colleges that had been given accreditation by the Western Regional Committee of the NCTE in 2008 despite the explicit recommendations of the Government of Maharashtra not to do so. This was a high profile case and later reached to the Supreme Court (Government of India, 2012). The previously mentioned Review Committee under the Chairmanship of Sudeep Banerjee created by the MHRD in 2007 may also have contributed to the mounting concern that led the NCTE to act in 2009.

The year 2009 is important as it marked the beginning of tightening regulations. This is also the year that the growth of TEIs levelled off as in Figure 8. Figure 9 below shows a clear reverse trend from the year 2009-10 in the number of newly recognised B.Ed. courses and those that were refused/withdrawn. Since then, the NCTE started recognising much fewer courses and started refusing/withdrawing recognition. The NCTE Regulation amendment in 2009 possibly contributed to this decline from 2009. However, the interview data instead consistently point to market saturation as a more fundamental reason: '*I personally feel that this teacher education came to a saturated level. There is no need any more*' (NCTE1, senior official, NCTE); '*They are closing down because not many students are available for them nowadays*' (NCTE2, senior official, NCTE). The previously mentioned litigation case against the NCTE in 2009 also suggests that the reason the Government of Maharashtra recommended not to open further B.Ed. colleges was due to the saturation of such in the region (Government of India, 2012).
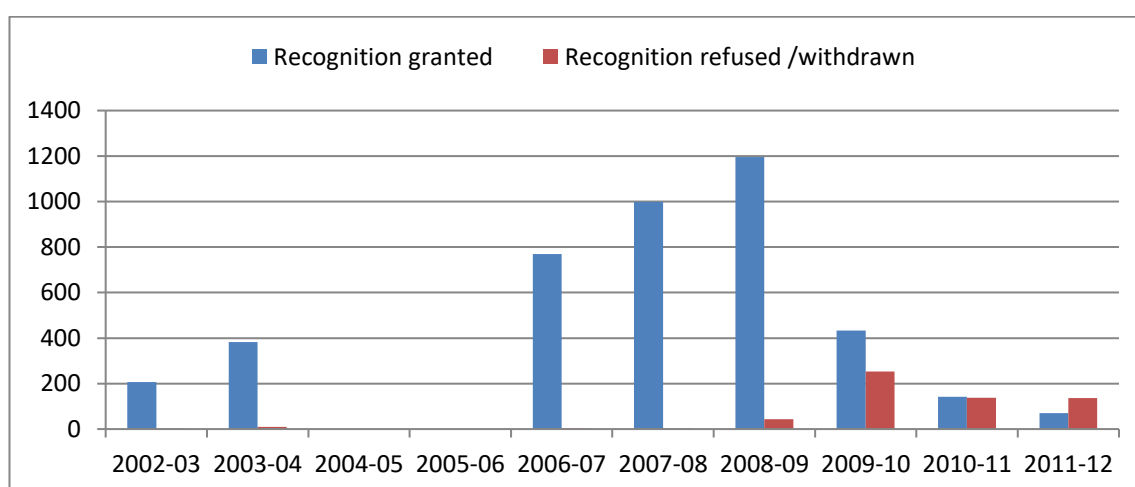

Figure 9: Number of TE institutions recognised and withdrawn B.Ed. courses

Source: (NCTE, 2012, 2011b, 2010, 2009c, 2008, 2007, 2004, 2003b)

The alteration of the NCTE Regulation indicates the shift toward a compulsory EQA system, that was a strong control mechanism to assure minimum standards for all institutions (IIEP, 2006). As a consequence of the change, '*this has brought more number of institutions for applying for accreditation*' (NAAC2, consultant, NAAC). It suggests that the significance of the policy of the NCTE-NAAC accreditation had changed, even though the content of the MoU remained identical. The literature argues that there is no sharp distinction between the policy formulation stage and the implementation stage, and policy decisions that re-shape the policy can just as well be made during the implementation stages, and they can therefore be viewed as policy-making decisions (Bach et al., 2012; Howlett et al., 2009; Verschuere, 2009). This study seems to confirm that re-shaping of the policy occurs through decisions during the implementation stage, without changing the policy text.

(iii) Gap period from 2011-2014 & the move to mandatory accreditation in 2013

The table below captures the main events described in this part.

Table 17: Key events referred in this section

Date	Event
7 Oct 2008	NAAC - NCTE MoU (3rd)
2009	Bombay High Court litigation case against NCTE
2011	Supreme Court appointed a high-powered Commission
2012	The Supreme Court Commission issued a report
2013	UGC made accreditation mandatory
14 Aug 2014	NAAC - NCTE MoU (4th)

Source: researcher's compilation

The MoU was effective for three years, and initially signed in 2002, and renewed in 2005, 2008 and 2014. This means that there was no MoU between 2011 and 2014, though the absence of the MoU did not disturb the actual practice and the NAAC continued accreditation as it had become a part of regular work of the NAAC, according to NAAC1. The situation of the NCTE around this period may explain the absence of action from the NCTE side. The 2009 litigation case at the Bombay High Court referred to earlier regarding the decision to reverse NCTE recognition of 291 TE colleges had continued to develop. The court case reached the Supreme Court, which considered that the issues raised were of 'considerable public importance', and appointed a Commission headed by Justice Verma on the 13th May, 2011 'to examine the entire gamut of issues which have a bearing on improving the quality of teacher education as well as improving the regulatory functions of the NCTE' (Government of India, 2012, p. 2). After the investigation, the Commission issued a report *Vision of Teacher Education in India,*

Quality and Regulatory Perspective in August 2012 (Government of India, 2012). The report concludes that many of the institutions given recognition by the NCTE clearly did not meet the requirements set by the NCTE. This raised questions over the work of the NCTE. During this problematic period, the renewal of the MoU may not have been considered very important. This also seems to be the period when the gradually increasing concerns over the quality of TEIs turned to actual and serious complaints, creating a new policy problem, which demanded further government attention, which started a new policy cycle. As the concern over the quality of TEIs was not strongly addressed at the time of the NCTE-NAAC accreditation policy-making in 2002, the problem stemming from the same root appears to have become more serious.

There was another notable event that changed the meaning of work of the NAAC in 2013. *The University Grants Commission (Mandatory Assessment and Accreditation of Higher Education Institutions), Regulations, 2012*, which came into effect on January 19, 2013, mandated all universities and colleges to be accredited by recognised accreditation agencies, of which the NAAC is by far the largest. The Regulation provides incentives of funding[3] and penalties including the withdrawal of grants or recognition as HEI. This mandatory accreditation also applies to all TE colleges as a part of HEIs. Most of the interviewees were supportive of this move and regarded this as a natural development: '*Process evolved in that way. It evolved from voluntarily to compulsorily'* (NAAC1, senior official, NAAC), '*It is an evolutionary process'* (NCTE2, senior official, NCTE). They expected the limitation of the voluntary accreditation that they had experienced would change for the better. For example, NAAC1 explains as follows:

> Till now people thought it is voluntary, so they thought they can evade it off. But now they have to take it seriously. So, institutions, earlier, institutions that had serious concern of quality, came for accreditation. They opted for accreditation. They felt quality has to be there. But not many poorer ones are coming for accreditation. (NAAC1, senior official, NAAC)

NAAC2 commented on the same point, but in more restrained manner:

> Compulsion, for the system, it is good. That means all the institutions do not voluntarily come forward, they are forced to do that, because it is a mandatory requirement. That contributes to quality. But the desirable thing would have been institutions themselves would come forward. (NAAC2, consultant, NAAC)

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[3] Under Rashtriya Uchchatar Shiksha Abhiyan (RUSA), it has become mandatory for government run higher education institutions to get accreditation to receive funding. Major part of the funding of government higher education institutions has been taken over by RUSA from University Grants Commission in 2013.

Among the interviewees, only TEexpert4 opposed this move, arguing that what is necessary at this stage is supporting TEIs to improve, instead of controlling them with punitive measures (TEexpert4, senior official, research institute).

This definitive shift towards a compulsory EQA system further altered the significance of the NCTE-NAAC accreditation policy, while the content of the MoU remained identical. Following the discussion of basic choices of EQA systems in Chapter 3, this move may raise a question regarding the consistency of the policy. According to the literature review, voluntary accreditation points to improvement as the main purpose of EQA, while compulsory accreditation points to control and compliance (Harvey and Newton, 2004). This would create a difference in operationalisation. For instance, the level of standards may be different for voluntary and compulsory accreditation while standards for compulsory accreditation should not be too low to be meaningful assessment or too high and disrupt education system (IIEP, 2006). However, with the move towards compulsory accreditation in 2013, the NCTE-NAAC accreditation did not adjust its policy instruments such as accreditation criteria. This may suggest that policy decisions closely related to the policy may affect the coherence of the policy, even when the policy text remains unchanged.

(iv) Termination of NCTE-NAAC collaboration in 2017

When I conducted my field work in 2014, there was an active discussion to reform TE in India in response to the earlier mentioned Justice Verma Commission Report (Government of India, 2012). One of the recommendations from the Commission was that the NCTE had its own accreditation. NAAC2, who was a member of one of the committees of the Commission, states '*The idea [of having own accreditation agency] was revived, brought to the fore again, NCTE again discussed, the committee discussed how to have an accreditation agency*' (NAAC2, consultant, NAAC). This discussion later resulted in the NCTE's decision to change the partner of accreditation from the NAAC to the Quality Council of India (QCI). A new draft framework called *TeachR for accreditation and ranking of TEIs* published by the NCTE in 2017 explains the decision as follows:

> Faced with a crisis of quality in the pre-service training of teachers, NCTE vide notification dated 28th April 2017 (…). According to this amendment, an institution recognized by NCTE is now required to obtain accreditation from an agency identified by it once every 5 years. (…) Until now, the agency designated by NCTE for accreditation was the National Assessment and Accreditation Council (NAAC). Between 2002 and 2017, NAAC could accredit only 1522 TEIs in the country. Given an estimated total of 16000 to 18000 TEIs that now need to be accredited, NCTE took a decision to discontinue the mandate given to NAAC and instead work with the Quality Council of India

(QCI), an autonomous agency under the Department of Industrial Policy and Promotion, Government of India (NCTE, 2017, p. 5).

At this stage, the NCTE-NAAC accreditation policy process had completed a full cycle. During the policy implementation, a new policy agenda emerged, and a new policy replaced the policy of the study. In this case, the new measure was an accreditation with QCI as compulsory for TEIs.

Concluding remark

Overall, this section demonstrated that the standing of the NCTE-NAAC accreditation had been altered through the changes in context and related policies, although the content of the MoU remained largely identical. It seems to confirm that, 'Policies are in fact going through constant change and re-formulation throughout the whole policy cycle' as Bach et al. (2012, p. 187) argue. It also indicates the importance of studying related policies, policy ensemble, to appreciate a policy in question, as they may re-make meaning of the policy. Studying policy-making with broad view in terms of time and related policies may shed light on different perspectives to study a policy.

5.5   Summary

This chapter attempted to answer SQ 1 'What was the agenda setting and policy text production processes of the policy of the accreditation of teacher education programmes in India?' First, agenda setting of the policy was examined (5.2). It was found that the MHRD encouraged the NCTE to take action to address the concern over the quality of TE at that time. However, the policy problem was not clearly defined, and the interviewees explained the problems with the assessment systems of that time as the main reason for introducing an accreditation system. Further investigation found that the context of the rapid growth of private TEIs was an important factor that led the quality of TE to be recognised as a problem which demanded further government attention.

Second, the formulation of the policy text production in 2002 was analysed (5.3). The process was smooth and contest free. The discussion between the NCTE and the NAAC was mainly about operational and technical issues, but important issues such as objectives and policy output were not discussed. It is notable that the policy options were not explored and the choice of accreditation was pre-determined building on existing policies.

Third, the chapter concluded with the examination of developments after the policy formulation (5.4). It was done to examine the policy construction from a broad

perspective. It found that although the policy was introduced at an early stage of the rapid growth of TEIs, the follow-through of the policy was slow. The effective regulation measures of TEIs seemed absent in the 2000s, which further heightened concerns until the end of the decade, and the NCTE finally started tightening the regulation in 2009. The NCTE terminated the collaboration with the NAAC and started collaboration with another organisation in 2017. The introduction of the policy of the study in 2002, tightening regulation in 2009, and termination in 2017 seem to be have been done in response to the problems of the time. Furthermore, this section found that formulation of the policy did not stop when the two agencies signed a first MoU in 2002, but the policy went through re-formulation over time due to changes of related policies and context.

The analysis in this chapter seems to suggest the importance of analysing policy from a broader perspective. This chapter includes examination of context, related policies and the changes of significance after the time of policy text production. The analysis illuminates that important decisions and meaning-making in this study were often taken outside of formal policy formulation space, silently shaped by policy discourses and context of the time. Put differently, specific context and discourses of the time seemed to have framed the policy-making space and policy direction in specific ways.

Chapter 6 - Examination of the NCTE-NAAC Accreditation Policy

6.1 Introduction

This chapter answers research sub question (SQ) 2: What are the discourses embedded in the policy of accreditation of teacher education programmes in India? While the previous chapter examined the policy formulation, this chapter examines how the NCTE-NAAC accreditation of TE is discursively constituted in the selected policy documents. Specifically, this chapter analyses the following three documents: i) the MoU between the NCTE and the NAAC that started the NCTE-NAAC accreditation of TE in India in 2002 (the MoU); ii) a five-year strategic plan of the NCTE '*NCTE Perspective Plan 2003-2007*' published in 2003, soon after the first MoU (the NCTE Perspective Plan); and iii) the NAAC manual '*Manual for Self-appraisal of Teacher Education Institutions*' that operationalises the policy (the NAAC manual). While the MoU was the mutual agreement between the NCTE and the NAAC, the other two documents were published by each organisation, representing their respective perspectives. The summary of the document is found in the table below and more details are provided in the methodology chapter. In addition to the analyses of these policy texts, this chapter also draws upon interview data to supplement the textual analysis.

Table 18: Summary of the three policy documents for analysis

Title	By	Year	Note
MoU	NCTE NAAC	2002	Agreement to start NCTE-NAAC accreditation
NCTE Perspective Plan	NCTE	2003	NCTE's five-year strategic plan, which refers to NCTE-NAAC accreditation
Manual for Self-appraisal of Teacher Education Institutions	NAAC	n.d. (2007)	Manual explaining accreditation of TEIs

This chapter begins with a discussion of the concept of education quality (6.2), followed by a review of the objectives of accreditation (6.3). It then examines the mechanisms of accreditations including the procedures and criteria (6.4). It concludes with a summary of the chapter (6.5).

6.2 Concept of quality

Quality is a key concept for external quality assurance (EQA) including accreditation because the way *quality* is defined provides the conceptual underpinnings of an EQA

mechanism and their processes. The difficulty in defining quality of education was extensively discussed in Chapter 3. With this understanding, this chapter starts with examining how the concept of *quality* is defined in the selected documents.

First of all, none of the three documents has an explicit definition of the concept of *quality*. More precisely, the MoU describes who lay down Norms and Standards for the NCTE-NAAC accreditation, the NAAC manual defines the criteria used for the NCTE-NAAC accreditation, while no relevant description of *quality* is found in the NCTE Perspective Plan. The examined documents suggest that while the NCTE-NAAC accreditation does not have an explicit definition of *quality*, it defines the Norms and Standards for accreditation. Absence of an explicit definition of *quality* possibly reflects the inherent difficulty in defining the quality of education. In this context, referring to standards or criteria to measure *quality* as in the MoU and the NAAC manual is one of the common approaches to define *quality,* as discussed in the literature review (Schindler et al., 2015). The simplest way to define education *quality* is to refer to indicator systems and to conclude that education *quality* is what these indicator systems describe and measure, as Scheerens (2004) explains. Moreover, setting clear evaluation criteria and standards is prerequisite for determining the threshold level for accreditation (Brink, 2010; Haakstad, 2001). I, however, believe that adequately defining *quality* requires both setting indicators to measure *quality* and defining and agreeing on the central goals of *quality*.

The MoU is further discussed in this section, and the criteria in the NAAC manual is examined later in Section 6.4.2 as a part of review of the operationalised accreditation mechanism. The MoU under the section of *Aims and Objectives* writes that 'NAAC and NCTE shall lay down the Accreditation Norms and Standards' (NCTE and NAAC, 2002, p.1). Further details regarding who defines the Accreditation Norms and Standards is specified. The MoU states that 'NAAC and NCTE shall jointly constitute a National Consultative Committee to evolve and review norms and standards for accreditation of teacher education programmes' (p.2). It also specifies that the National Consultative Committee consists of the following representatives of the NCTE and the NAAC: the NCTE chairperson, the NCTE vice-chairperson, the NCTE Regional Committee chairperson, the NAAC director, and four experts nominated by the NAAC. The MoU indicates a vision of an accreditation system where government agencies (the NCTE and the NAAC) define Accreditation Norms and Standards which are to be used in order to assess TEIs to determine whether they receive accreditation.

The most important point to discuss is that the MoU defines who is given authority to define *quality* in the form of Accreditation Norms and Standards. This is crucial in policy-making because it relates to whose views are given legitimacy, as Ball (1993) argues, discourses are not only about what can be said and thought, but also about who can speak, when, where, and with what authority. In this case, the person whose views are counted to define *quality* is particularly important, because *quality* may be differently defined by each stakeholder. As discussed in the literature review, *quality* in HE is a contested term with multiple meanings and interpretations, but the efforts to identify and understand the concept of *quality* in HE seems to have been settled, pragmatically, for stakeholder-relative *quality* (Newton, 2010; Watty, 2003). Put differently, *quality* is related to the user and to circumstances; stakeholders do not share the same interests and values; therefore, each may potentially define *quality* in different ways. This means that although every stakeholder such as TEIs, HEIs, teacher educators' association, teacher unions, students, and parents may have different understandings and expectations of *quality*, the NCTE and the NAAC had chosen to define what counts as *quality* by their representatives rather than building a shared concept of *quality* among wider stakeholders. The potential gap between government and other stakeholders on what counts as *quality* may have implications, such as potentially enforcing other stakeholders' compliance to the government's view of *quality*, which they may not necessarily agree to. This mirrors what Harvey (2002c) identifies as a common problem with accreditation systems, where 'stakeholder-relative' understanding of *quality* is not practiced in a pure form, for the accreditation standards as fixed criteria are used in practice without considering differing views. It is a 'producer-determined fitness' (Harvey, 2002c, p. 252). Consequently, this is likely to encourage compliance to government preferences and a reduction of variations, since the criteria and standards communicate a detailed framework of preferences against which institutions know they will be judged (Harvey, 2002; Martin & Stella, 2007). In this vein, the majority of academics regard state-imposed national standards as inimical to a good HE system, in protecting institutional autonomy (Brink, 2010).

Overall, in the three documents examined, it appears that *quality* is pragmatically defined by what indicator systems define and measure. The MoU only specifies who is given authority to define such indicators, and the selection of members suggests that state-defined *quality* will be used for accreditation. This may frame the NCTE-NAAC accreditation as a state regulatory mechanism.

6.3   Competing objectives of the accreditation

This section investigates the objectives of the NCTE-NAAC accreditation envisioned in the three documents, i.e. the MoU, the NCTE Perspective Plan, and the NAAC manual. To understand the objectives, the description of the rationale and the use of accreditation outcomes are examined. To guide the analysis, I use four rationales discussed in the literature review: accountability, control, compliance, and improvement. I also pay attention to the uses of accreditation outcome following the discussion in the literature review. The three documents are examined in turn.

The MoU between the NCTE and the NAAC

There is no explicit explanation of the rationale of the NCTE-NAAC accreditation in the MoU. However, the description of the envisioned NCTE-NAAC accreditation system in the MoU frequently points to *improvement* of quality of education, for example: 'quality sustenance in pre-service teacher education in the country' (p.1), 'pursuit of excellence in teacher education' (p. 1), 'regular follow up of quality initiatives' (p.1), 'quality promotion and sustenance among teacher education institutions' (p.1), and 'dissemination of healthy practice and innovations for creation of a quality culture' (p.2). In contrast, phrases indicating other rationales, i.e. *accountability, control, compliance*, do not appear in the MoU. It can be argued that the tenor of the MoU clearly points towards a rationale for *improvement.*

The uses of accreditation outcome are not elaborated in the MoU either. There is no indication of positive nor negative consequences attached to accreditation result. The only use of accreditation outcome mentioned in the MoU is the 'dissemination of healthy practices and innovations for creation of a quality culture' (p,2). This use is consistent with the *improvement* rationale, as it suggests the emphasis is on formative assessment and promoting improvement of participating institutions rather than the use of assessment results by external organisations. In summary, the analysis of the rationale and the uses of the outcome of accreditation assessment suggest the objective of the accreditation envisaged in the MoU is *improvement*.

The NCTE Perspective Plan 2003-2007

The second document to be discussed is the *NCTE Perspective Plan 2003-2007* published in 2003, soon after the MoU was agreed in 2002. The NCTE-NAAC accreditation is mentioned in Section 2.1 *Determination and review of norms and standards* in Chapter 2 *Tasks planned to be carried out by NCTE in the next five years* of the document (NCTE, 2003c, p. 4–6). Section 2.1 has two attachments: the MoU (p.

44-46) and a letter dated 26 December 2002 issued by the NCTE to the principals of TEIs notifying them about introducing the NCTE-NAAC accreditation (p.47).

The *NCTE Perspective Plan* does not directly describe the rationale or objectives of the NCTE-NAAC accreditation system. However, it does refer to various uses of the information gathered and generated through the accreditation process, from which the objectives may be inferred. The analysis of the uses suggests that the NCTE views the NCTE-NAAC accreditation as a summative assessment. The NCTE refers to the accreditation as an 'instrument' (p.4) for the NCTE to gather data, which indicates that the emphasis is on external uses of comparable outcome data rather than internal use by participating TEIs for *improvement*. The NCTE expects that the information gathered through the accreditation 'helps in revealing ground realities of implementation of the conditions of recognition' (NCTE, 2003c, p. 4) and 'it [the accreditation] will be used by NCTE as an instrument for updating realistically the norms and standards for teacher education programmes' (p.5). It should be noted that the norms and standards here refer to those of the NCTE recognition and not to the 'accreditation norms and standards' in the MoU. In sum, the primary use of accreditation outcome for the NCTE seems to be for monitoring of TEIs as a part of its mandated regulatory work, which points to the *control* rationale.

There is another reference to the use of the outcome of accreditation, as quoted below, that suggests the NCTE had an even stronger *control* rationale in mind:

> NCTE will frame appropriate Regulations to the effect that enhancement in intake and expansion of teacher education programmes by a teacher education institution is directly linked with the assessment of its capacity as revealed in the ranking given by the NAAC system. In case of consistently low ranking by NAAC, the institution may be considered for withdrawal of recognition. NCTE will encourage institutions running B.Ed. programme ranked high in the NAAC assessment to start D.Ed. programmes (NCTE, 2003c, pp. 5–6).

The excerpt indicates that the NCTE intended to set positive and negative consequences to the result of accreditation to control the practices of TEIs. This is consistent with an important aspect of a *control* rationale of accreditation, which is to ensure that the core principles and practices of HE are not eroded or disregarded (Harvey, 2002c). These suggested consequences, i.e. giving permission for the expansion of student intake and programmes as well as withdrawing recognition, were in fact implemented in 2009 through the amendment of the NCTE Regulations (see Section 5.4).

Moreover, the letter from the NCTE to principals of colleges dated 26 December 2002 says that it is mandatory for all the recognised institutions to seek accreditation from the NCTE-NAAC within a period of five years of grant of recognition by the NCTE (p.47). Although it was not enforced at that time and the NCTE-NAAC accreditation remained voluntary for many years, the letter suggests the NCTE's vision to make it mandatory. To conclude, *the NCTE Perspective Plan* suggests that the NCTE had a vision of the NCTE-NAAC accreditation for controlling TEIs with a top-down, mandatory system that comes with high-stake consequences.

The NAAC manual

Finally, the third document, *the NAAC manual* is examined to find out what the NAAC's vision of the NCTE-NAAC accreditation system is. The following paragraph that appears on the first page of the Introduction in Part A, *Guidelines for Assessment and Accreditation* of the document, clearly indicates that the rationale of accreditation for the NAAC is *improvement*:

> The process of Assessment and Accreditation (A&A) is <u>not an external regulatory mechanism or a superior outside judgment</u> scheme. It is essentially the collective endeavour of an <u>institution and its personnel</u> <u>to constantly and consistently move forwards and upwards</u> in the direction of relevance, effectiveness and credibility of the professionally [*sic*] work they are engaged in. It is a process by which an institution of higher learning periodically evaluates its activities and seeks an independent outside opinion on its success in achieving its own educational objectives. (…) <u>Self-appraisal is thus the backbone</u> of the quality improvement exercise. The role of the NAAC, the external accrediting agency is that of <u>a friend, philosopher and guide</u> (NAAC, n.d., p. 8). [emphasis added]

The *improvement* rationale underpinning the above description of the accreditation process is clear. It depicts that the accreditation process is 'to constantly and consistently move forwards and upwards', agreeing with the definition of *improvement* rationale, aiming to promote future performance and continuous quality enhancement rather than making judgements based on past performance (Kis, 2005). The emphasis on the importance of self-evaluation is also consistent with the *improvement* rationale, whose role for improvement is widely recognised and is discussed in the literature review. The roles and relations of actors illustrated in the excerpt also point to *improvement* rationale. A first point to note is that the description of the accreditation process starts with a negation: 'The process of Assessment and Accreditation (A&A) is not an external regulatory mechanism or a superior outside judgment scheme' (p.8). This suggests that for the NAAC, it is crucial to refute the prevalent image of such power relations where an accreditation agency is regarded as an intrusive authority and institutions as passive subjects to be externally inspected. Instead, the guideline above depicts institutions as

primary and active actors, and the accreditation agency is a 'friend, philosopher and guide' (p.8). With this non-hierarchical approach, it tries to secure openness that is essential for an honest and critical self-assessment for improvement and thus, to mitigate the risk of institutions hiding weakness to influence judgements (Kis, 2005; Kemenade & Hardjono, 2010). This friendly relation enables the NAAC to portray accreditation as an opportunity for TEIs to periodically evaluate their activities for their improvement, with the NAAC being portrayed as a 'friend, philosopher and guide' supporting the process.

There are two ways in which outcome of accreditation is to be used as specified in the manual: institutional grading and peer team report, which are supplemented by summary reports such as reports on good practices based on peer team reports. The grading of an institution reflecting the level of performance is suggested to be shared with the public on the NAAC website. While the grading is quantitative, the peer team report is a qualitative evaluation prepared by a team of experts who conduct the field visit. After approval by the Executive Committee of the NAAC, the peer team report is posted on the NAAC website (NAAC, n.d.). Its use is explained in the NAAC manual as follows:

> The PTR [peer review report] can be relied upon <u>by the public and other stakeholders</u>, to get authentic information about the concerned HEI, and also serve as a guide for making preferential selection among institutions by the <u>students</u>. It may be used for wider dissemination of institution-specific policies and practices, some of which may be the best practices, for <u>other institutions</u> to emulate. Finally, PTR would enable <u>institutions</u> to plan and implement necessary intervention strategies for total quality management and work towards achieving excellence in the educational services rendered by it (NAAC, n.d., p. 15). [emphasis added]

These uses in the above quote clearly indicate the *improvement* rationale of the accreditation system, to 'work towards achieving excellence in the educational services'. The quote also suggests some aspect of *accountability* rationale for public information by sharing the results with the public. The specified users of the accreditation outcome are underlined in the quote: 'the public and other stakeholders', 'students', 'other institutions', and (assessed) institutions. There is no reference to the government's use of the results with high-stake consequence such as reward or punishment.

Syntheses of discussions on the three documents with differing objectives

To conclude the section, key issues emerging from the above analysis of the three documents are discussed. The analysis reveals a clear discrepancy between the NCTE and the NAAC documents about the objectives of the NCTE-NAAC accreditation. The NCTE document clearly indicates a vision of the accreditation system primarily as *control* measure. This points to an 'external regulatory mechanism' and a 'superior outside

judgment scheme' (NAAC, n.d., p. 8), which the NAAC manual strongly denies. Contrasting the view of the NCTE, the NAAC document illustrates a clear vision of accreditation for *improvement*. The MoU, which is a document owned by both agencies, is less clear about its rationale and uses.

Their different views seem to reflect the organisational discourses based on the mandate of organisations. While the NCTE, as regulatory body, regarded the NCTE-NAAC accreditation as an instrument of their regulatory work, the NAAC had already chosen an approach to accreditation as *improvement* at its establishment in 1994. It seems that this difference was not apparent at the time of the MoU negotiation, possibly because the MoU mainly noted technical and administrative agreements without much discussion of rationale or underpinning philosophy of accreditation. The examination in Chapter 5 also indicates administrative-focused discussions between the NCTE and the NAAC during the policy text production process. The lack of clarity of the rationale in this case may have allowed the differing views to co-exist. Furthermore, while the NAAC communicates with TEIs portraying accreditation as a process of *improvement*, the NCTE's *control* rationale may not have been very apparent. This situation resonates with the following claim in the literature:

> The lack of clarity arises because the rationale is rarely openly admitted. The rhetoric and documentary preambles in many countries refer to quality evaluation as a process of improvement, yet all the emphases are on accountability, compliance and, in some cases, control of the sector (Harvey and Newton, 2004, p. 151).

This issue also leads back to the much-discussed topic of the relationship between different rationales (see Chapter 3). Some argue that *accountability* and *improvement*, two major rationales are incompatible, while others claim that they can be balanced (Harvey & Newton, 2004; Middlehurst & Woodhouse, 1995; OECD, 1999; Thune, 2006). Although I support the latter view, I also believe the importance of recognising the difficulty of balancing the two roles, and the need to have a strategy to ensure necessary elements such as professionalism, openness, trust, and involvement of stakeholders as suggested in the case of other countries (Danø and Stensaker, 2007; Thune, 1996). Due to the administrative-focused discussions between the NCTE and the NAAC during the policy text production process, an opportunity to have necessary negotiation to balance different rationales may have been missed in this case.

6.4 Accreditation mechanisms

This section reviews how the vision of the NCTE-NAAC accreditation is operationalised as the proposed mechanisms. As the NAAC is tasked to operationalise the NCTE-NAAC

accreditation, only the NAAC manual describes the procedures and criteria, which are examined in this section.

6.4.1 Procedures of accreditation

As examined in Chapter 3, the accreditation procedure is almost identical globally, which includes the following three key elements: i) self-evaluation, ii) peer review and iii) decision-making and public reporting. The NAAC accreditation also followed the same methodology. The NAAC manual specifies the following four steps for NCTE-NAAC accreditation: i) on-line submission of a Letter of Intent; (ii) the preparation and submission of a Self-appraisal Report (SAR); (iii) the on-site visit of the peer team for validation of the SAR and to recommend the assessment outcome to the NAAC; and (iv) the final decision by the Executive Committee of the NAAC (NAAC, n.d., p. 10). The only difference in the NAAC process to that outlined in the literature review is the addition of the initial application step to clarify procedures. It suggests that the global uniformity of accreditation procedures claimed in the literature also applies in the case of India.

This uniformity points to the issue of cross-national influence and transferability, which recurs in the literature of EQA, especially concerning less developed countries where the context of HE relating to resources and cultures could be substantially different, as discussed in Chapter 3 (Bazargan, 2007; Billing and Thomas, 2000; Bordia, 2001; Houston and Maniku, 2005). This issue in the case of India is further discussed. Although the implementation of the policy is beyond the purview of this study, questions regarding suitability of the generic model to the local environment is crucial to discuss accreditation procedures.

I identified three interrelated issues in the interview data that may indicate some misfit of the NAAC accreditation model to the Indian context. The first is related to Self-appraisal Reports (SAR). Two interviewees said it is common for TEIs to hire external consultants to prepare SAR, due to lack of appropriate knowledge and human resource within institutions. For example, TEexpert2, who has worked as a NAAC peer reviewer since the 1990s explains the reality of such institutions: 'They just can't write a paragraph in English on their own. They can't do that. NAAC expects this, this self-appraisal report in English. (…) So, they hire somebody to do it for them. (…) When I read the report, I know this is, this is outsourced' (TEexpert2, principal, research institute). The NAAC manual which describes accreditation procedures and criteria also only has English version. The NAAC's selection of language seems to make it difficult for some TEIs to prepare SAR by themselves. As specified in *Quality Assurance and Accreditation: A Glossary of Basic*

Terms and Definitions published by UNESCO (Grünberg and Pârlea, 2007, p. 25), the self-evaluation process is assumed to be 'conducted by the faculty, the administrators, and the staff of the institution or academic programme', and reflection on their work is considered to be the most important phase of the accreditation to particularly for *improvement* purposes (Kis, 2005). The NAAC manual also notes 'Self-appraisal is thus the backbone of the quality improvement exercise' (p.8). Thus, the use of external consultants in this phase may undermine the expected benefit based on the assumption of 'self-appraisal'.

The second issue which emerged from the interview data is the cultural difficulty of being a critical peer reviewer. It was discussed by four interviewees. This difficulty is caused because they personally know many people from the TEIs, as expressed in the following quote:

> It's a very, very difficult job because if I do not help you, you will become my enemy. If I help you, then I am not following all the rules and regulations. If I follow the rules and regulation, I cannot help you. And if I want to help you, then I have to bypass the rules. (NCTE3, senior official, NCTE)

One TE expert even stated he keeps declining the request from both the NCTE and the NAAC to work as inspector and peer reviewer due to the environment where it is difficult to make honest and critical comments (TEexpert1, senior official, research institute). This issue could threaten the existence of the accreditation system as neutral and independent assessor. Another expert commented that whoever wants to conduct external assessment of TEIs, either the NCTE, the NAAC, the MHRD, or state government, usually have to hire TE experts, who are also involved in TEIs in various capacities, and they are all trapped in these difficult dynamics (TEexpert3, senior official research institute). There are studies that suggest cultural values impact individuals' preferences for specific conflict handling styles (Caputo et al., 2019; Gunkel et al., 2016).

The third issue regards political relations between organisations. According to a NAAC data management official, only a few institutions, including possibly one TEI, failed to gain accreditation from the NAAC in their twenty-year history. NAAC3 explains this is because the TEIs that apply for NCTE-NAAC accreditation are already in operation, which means that they are recognised by the NCTE and affiliated with universities, and it would be difficult politically for the NAAC to challenge their judgements and refuse to give accreditation (NAAC3, TE expert, NAAC). This indicates institutional relations may affect accreditation judgement.

These three examples exhibit difficulties at three key steps of accreditation, i.e. self-evaluation, professional assessment of reviewers, and the judgement based on the evidence. The reasons for the difficulties are different; language and inadequate human resource, culture of personal relations, and political institutional relations. These issues suggest the existence of cases where accreditation procedures are difficult to implement as intended in the policy documents for different reasons. Not fulfilling the assumptions made for the procedures may undermine logic and value of accreditation claimed in the theoretical discussion in the literature.

These difficulties may point to a potential mismatch between the global model and the local context of India. The observed difficulties in the study support the importance of discussion on transferability and potential difficulties of contextualisation of the concepts and systems of accreditation in the context where resources and cultures could be substantially different (Bazargan, 2007; Billing and Thomas, 2000; Bordia, 2001; Houston and Maniku, 2005). However, it is also important to recognise that having an internationally comparable EQA process is important in the era of globalisation, as discussed in Chapter 3. More empirical studies are required to investigate this difficult balance between the local and global requirements.

6.4.2 Criteria

An accreditation system requires threshold criteria or minimum standards in order to make judgement of accreditation status. The NAAC manual sets the criteria of the NCTE-NAAC accreditation which 'form the basis of assessment and accreditation' (NAAC, n.d., p. 134). Following the discussion in Section 6.2, the criteria in this case are particularly important, as the quality of TE is de facto defined by what the NAAC manual prescribes to measure. This section examines how the NAAC manual defines what counts as good quality initial teacher education (ITE).

Structure

There are seven *criteria* specified in the manual: curricular aspects; teaching-learning and evaluation; research, consultancy and extension; infrastructure and learning resources; student support and progression; governance and leadership; and innovative practices. Although they are called criteria, they are really domains. Each criterion is explained by four to nine *criterion statements* that 'spell out the qualitative aspects and good practices expected of an institution' (p.19). There are a set of questions for each criterion that operationalise the criteria. These questions are organised in two parts: Part One seeks quantifiable data such as answering in numbers or choosing from multiple

choice answers, while Part Two requires descriptive answers to open-ended questions. There are also *key aspects* specified for each criterion which are used to categorise the questions in Part Two. The table below shows the *criteria*, *key aspects* and the number of questions. Each criterion has 19 to 60 questions, totalling 317 questions in all. Firstly, what is striking is a large number of questions. The sheer volume of questions would pose a challenge for TEIs to answer and for reviewers to assess.

Table 19: Criteria, key aspects, and the number of questions

	Criterion	Key Aspects	Number of questions		
			Part1	Part2	Total
1	Curricular Aspects	Curricular Design & Development	14	5	30
		Academic Flexibility		4	
		Feedback on Curriculum		3	
		Curriculum Update		2	
		Best Practices		2	
2	Teaching-Learning and Evaluation	Admission Process and Student Profile	19	5	52
		Catering to Diverse Needs		5	
		Teaching - Learning Process		10	
		Teacher Quality		7	
		Evaluation Processes and Reforms		4	
		Best Practices		2	
3	Research, Consultancy and Extension	Promotion of Research	17	4	45
		Research and Publication output		7	
		Consultancy		4	
		Extension Activities		5	
		Collaborations		6	
		Best Practices		2	
4	Infrastructure and Learning Resources	Physical Infrastructure	26	6	57
		Maintenance of Infrastructure		3	
		Library as Learning Resource		10	
		ICT as Learning Resource		4	
		Other Facilities		5	
		Best Practices		3	
5	Student Support and Progression	Student Progression	24	10	52
		Student Support		11	
		Student Activities		6	
		Best Practices		1	
6	Governance and Leadership	Institutional vision and Leadership	21	8	60
		Organizational arrangements		6	
		Strategy Development and Deployment		7	
		Human Resource Management		11	
		Financial Management and Resource Mobilization		6	
		Best Practices		1	
7	Innovative Practices	Internal Quality Assurance System	5	5	19
		Inclusive Practices		6	
		Stakeholder Relationships		3	
	Total		126	189	317

Source: researcher's compilation

Secondly, there are several issues regarding how criteria are structured. First is the unclear linkage between different components, i.e. *criteria*, *criterion statements*, *key aspects* and *questions*. What seems most problematic is that the *criterion statements*, which seem to describe the desired key outcome, are not tied to *key aspects* or *questions*. Subsequently, there are *criterion statements* such as 'The assessment and evaluation outcomes are used in improving the performance of the students and curriculum transaction' (p.22) that does not seem to have relevant *questions*. As a result, although the *criterion statements* seem to describe the desired key outcome, what is measured by *questions* may be different. Put differently, there may be a gap between what is intended to measure and what is actually measured.

Another issue with the structure is the mix of different levels of questions without clear rationale. There are broad questions such as 'How does the institution ensure that student teachers develop proficiency for working with children from diverse backgrounds and exceptionalities?' (p.102) listed in parallel with micro questions such as 'What is the ratio of student to teachers identified practice teaching schools?' (p.87) As there is no explanation for the selection of *questions*, this makes it difficult to infer what these set of *questions* are designed to measure as a whole.

The above two issues may be summarised as a lack of clear structure that makes it difficult to develop a coherent framework. Within this unclear structure, there are as many as 317 questions, which makes it difficult to understand what the vision of good TEI is that the accreditation criteria seek to adhere to. Actual self-appraisal reports submitted by TEIs, which I saw at the NAAC office, came to hundreds of pages, and sometimes appeared in two volumes. Without a clear framework, it seems very difficult to ensure that different reviewers make consistent and transparent judgement from the answers to these 317 questions.

The conceptual framework

The previous part pointed out that the unclear structures and lack of explicit explanation make it difficult to understand the intended vision of TE as well as what is measured. This section attempts to infer a conceptual framework that underpins the vision of TE by examining the NAAC manual. What is particularly notable is that the education system appears to be conceptualised as 'input-process-output' in the NAAC manual. For example, it states that it 'maps out different input, process and output norms that constitute the indicators of quality of a teacher education institution' (p.17), and 'NAAC will take a holistic view of all the input, processes and output of an institution' (p.18). It is

common to depict education as a production system in which education institutions can be seen as a production process whereby *input* by means of *process* results in *output* (Scheerens, 1992, 1990; Stufflebeam, 1971). This perspective on education quality belongs to the rational goal model in organisational theory, where productivity and efficiency are the central criteria (Scheerens, 2004).

The use of 'input-process-output' framework appears to reflect the key discourse shift in education from input to outcome, as discussed in the literature review. Chapter 5 also found that many stakeholders' interview responses were framed using this concept, i.e. dissatisfaction with the pre-2002 input-focused assessment mechanisms and the expectation that the new assessment would focus more on process and outcome. This may indicate that the discourse of outcome emphasis was widely internalised in TE stakeholders in India.

Based on this, I have used the 'input-process-output' model to analyse the criteria in an attempt to understand how the NAAC criteria are framed. I have categorised the *questions* into input, process, and output, and the results are shown in the table below. The table excludes 23 questions that do not fall in any category such as questions about contexts that are not under the control of schools.

Table 20: Number of questions (I = input, P = process, O= output, T = total)

	Criterion	Part One (quantitative)				Part Two (descriptive)				Total
		I	P	O	T	I	P	O	T	
1	Curricular aspects	9	4	0	14	6	7	0	16	30
2	Teaching-learning and evaluation	10	9	0	19	5	27	0	35	54
3	Research, consultancy and extension	9	2	5	17	9	3	10	28	45
4	Infrastructure and learning resources	25	1	0	26	22	5	1	31	57
5	Student support and progression	18	2	4	24	6	13	5	28	52
6	Governance and leadership	7	14	0	21	20	16	1	39	60
7	Innovative practices	2	2	1	5	4	8	2	14	19
	Total	80	34	10	126	72	79	19	191	317
	Percentage (within the part)	65%	27%	8%		42%	46%	11%		

Source: researcher's compilation

The above table shows that input questions are in the majority, understandably more so in the quantitative part (Part One, 65%) and in *Criterion 4 infrastructure and learning resources* (25 out of 26 questions). These questions typically ask if an institution has input, such as materials and facilities. There are also significant numbers of process-oriented questions (27% in Part One, 46% in Part Two). Many of these questions ask

about the process of systems (e.g. assessment, feedback, auditing, internal quality assurance). Though relatively smaller in number, there are output questions (8% in Part One, 11% in Part Two). They can be categorised into three types: the first is related to student attainment, including exam result, drop out, employment, progression to higher studies; the second is related to research output; and the third is connected to best practices in various aspects. The analysis may indicate stronger emphasis on the process and output compared to the pre-2002 input-focused assessment mechanisms discussed in Chapter 5.

Using this framework, further analysis was attempted by comparing questions in each category or for analysing the links between questions in different categories. However, I could not draw meaningful interpretations to understand the vision of TE the criteria adhere to. For the 'input-process-output' model to be effective, I argue, that there must be a clearer explanation of the model that coherently identifies a set of critical input-process-output factors. Absence of such clarification allows for the possibility of multiple interpretations of the criteria and the vision of ITE, which can undermine the work of accreditation.

Conflating institutional assessment and program assessment

The reason why the NCTE-NAAC assessment criteria do not communicate an explicit vision of ITE may be related to the fact that they were developed based on the NAAC's generic institutional assessment criteria. As discussed in the literature review, the unit of analysis for assessment is usually either institution or programme, and their assessment approach differ. While institutional EQA assesses quality of institutions as whole, programmatic EQA typically focuses on individual degree granting programmes that prepare students for specific professions, and it is crucial to assess programmes in relation to the professional requirements and expectations for entry into a specific profession (IIEP, 2006; Lenn, 2004).

The NAAC's primary mandate is institutional accreditation, which seems to have influenced the NCTE-NAAC assessment criteria design. In fact, the seven criteria for TE are the same as those for the institutional assessment of general universities. The table below compares the NAAC's seven criteria with other influential EQA: the domains of institutional accreditation criteria from the guidelines for EU countries, *the Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG, 2015); and programme accreditation standards for ITE providers of the Council for the Accreditation of Educator Preparation (CAEP) in USA. Although the table compares only

domains and not detailed standards, it still can be observed that there are more similarities between the NAAC and the ESG institutional assessment criteria in the sense that they broadly cover the key functions of HEIs, while the CAEP standard is more specific to TE (e.g. content and pedagogical knowledge, clinical partnership).

Table 21: Comparison of domains between different EQA systems

NAAC	ESG Institutional assessment	CAEP Programme assessment
Curricular Aspects	Policy for quality assurance	Content and pedagogical knowledge
Teaching-Learning and Evaluation	Design and approval of programmes	Clinical partnerships and practice
Research, Consultancy and Extension	Student-centred learning, teaching and assessment	Candidate quality, recruitment and selectivity
Infrastructure and Learning Resources	Student admission, progression, recognition and certification	Program impact
Student Support and Progression	Teaching staff	Provider quality, continuous improvement and capacity
Governance and Leadership	Learning resources and student support	
Innovative Practices	Information management	
	Public information	
	On-going monitoring and periodic review of programmes	

Source: researcher's compilation

The NAAC manual states that the seven criteria 'subsume and account for practices that can lead to quality improvement in teacher education' (p.17). However, the examination in this part suggests that the general institutional accreditation criteria lay the foundation of the NCTE-NAAC assessment criteria, to which some TE programme specific questions are added. The underpinning theory or model that may have guided such combination of the aspects of institutional functioning and TE specific practices which constitute a model of effective ITE is not clear from the analyses of criteria.

Overall, the criteria appear as the conflation of different perspectives, such as institution and programme, input-process-output, macro and micro, without an explicit framework that explains the combination. These conflated perspectives are represented through the enormous number of questions, which would be difficult to interpret and understand the assessment data. This is in stark contrast to other assessment tools studied, such as the one for CAEP, which sets a small number of clear standard statements describing the expected status, and expects TEIs to submit evidence showing they are meeting those

standards. The ambiguity in the NAAC tool could undermine the reliability of the accreditation system, while any judgement made as a result of accreditation 'should be based on explicit and published criteria that are applied consistently' (ESG, 2015, p. 17) as the ESG guideline stresses.

Teacher education specific questions

In this final part, several questions from the NAAC manual relating to ITE are studied to gain an understanding of the vision of ITE the NAAC manual envisages. In the absence of a clear structure, it is difficult to systematically examine 317 questions scattered over the various domains. Instead, I reviewed the questions in relation to requirements specific to teachers. From the commonly used categorisation for the expectation of teachers, i.e. knowledge, skills, and dispositions (Darling-Hammond, 2012; Ingvarson, 2002; Mandinach and Gummer, 2016), knowledge and skills related questions in *the manual* have been examined, as these two seem to have common features in the literature.

Firstly, the literature extensively discusses key knowledge sets teachers need. For instance, in their rigorous literature review, Westbrook et al. (2013, p.15) cite Shulman 's (1987) knowledge base for teachers as an influential framework which consists of the domains of content, pedagogical and curriculum knowledge, and knowledge of learners, educational contexts and ends. It is natural to assume teachers' knowledge is an important factor for the accreditation of ITE. Indeed, CAEP Standard One is 'Content and pedagogical knowledge', and the *Australian Graduate Teacher Standards* which is referred to in the national accreditation system for ITE detail the specific knowledge sets expected of teachers including 'know students and how they learn' and 'know the content and how to teach it' (AITSL, 2011, p. 4).

However, the NAAC criteria are not explicit about the knowledge sets expected of teachers. Among the 52 questions for *the NAAC Criterion 2, Teaching-Learning and Evaluation*, none of the questions refers to knowledge of learning, teaching or learner development. Similarly, among the 30 questions for *the NAAC Criterion 1, Curricular Aspects*, only three can be seen as TE specific: how the global trends in TE are reflected in the curriculum (p.83); how the curriculum bears national issues like environment and value education (p.83); inclusion of aspects such as inclusive education and practice teaching in the curriculum (p.83). While these aspects are important, they do not seem as comprehensive as the core knowledge required of teachers. For example, it does not refer to pedagogical and curriculum knowledge, and knowledge of learners. Content

knowledge is also not referred to in any of the questions, but this may be because the majority of ITE courses in India employ a consecutive model where students have a degree in specific subjects before entering ITE. Overall, the questions of the NAAC manual may communicate the vision of ITE that does not have a clear view on the foundational set of knowledge teachers need to acquire before entering the profession.

The second aspect, skills generally appear to be highly valued in accreditation criteria/standards. For example, the CAEP Standard 2 is 'Clinical partnership and practice' to ensure high-quality clinical practice are central to preparation. Australia's accreditation standards for ITE includes 'Professional experience' such as teaching practice at school and other sites, and refers to *Australian Graduate Teacher Standards* which includes three standards under professional practice including 'Plan for and implement effective teaching and learning', 'create and maintain supportive and safe learning environments', 'assess, provide feedback and report on student learning' (AITSL, 2011). The importance of teaching practice is common in these two accreditation standards, which is also supported by the literature. For example, Darling-Hammond (2006, p. 307) stresses the importance of 'extensive, well-supervised clinical experience' and 'closer, proactive relationships with schools' as central to ITE programme.

In contrast to its apparent scarce attention to knowledge, the NAAC manual clearly gives importance to teaching skills. For example, 18 questions specifically ask about 'practice teaching', regarding different aspects including preparation, frequency, length, process, collaboration with practice school teachers, use of technology in practice teaching, student-teacher ratio in practice schools, and support during the practice teaching. There are other questions asking about specific teaching skills including simulation, peer-teaching, block teaching, internships, micro-teaching and models of teaching. However, other types of skills, such as planning, assessment, feedback and classroom management are not dealt with. Overall, while teaching skills seem to be highly valued, other types of skills are not.

The above analysis on knowledge and skills suggests that the NAAC manual may communicate a vision of ITE that prepares teachers who have subject knowledge and teaching skills, without necessarily having a broad knowledge of underpinning theories and wider education management skills. The apparent insufficient attention paid to broad knowledge and skills that underpin teachers' professional judgement may reflect the traditional view of teaching.

The conceptions of learning and teaching has changed over time. The view of learning as a process of active construction whereby learners drew on prior knowledge and experience has replaced the traditional, transmission view of learning. Instead of effectively transmitting the content of the school curriculum as regarded in the traditional view, teachers are now expected to continuously make professional judgement and instructional decisions that is consistent with the demands of their subjects to help students who bring different prior knowledge to learning (Darling-Hammond and Bransford, 2007; Sawyer, 2006). At the same time, learning to teach is understood as complex and demanding intellectual work that requires pre-professional preparation that lays the foundation for teaching (Cochran-Smith and Villegas, 2015; Feiman-Nemser, 2001). The following quote from a policy document from South Africa well expresses the risk of not recognising the complexity of teaching:

> Teaching is a complex activity that is premised upon the acquisition, integration, and application of different types of knowledge, practices or learning. A purely skills-based approach, which relies almost exclusively on evidence of demonstrable outcomes as measures of success, without paying attention to how knowledge should underpin these skills for them to impact effectively on learning, will produce technicians who may be able to replicate performance in similar contexts, but who are severely challenged when the context changes. (DHET, 2015, p. 9)

What the NAAC manual is missing seems to be what the above quote stresses: close attention to the various types of knowledge that underpin teachers' practice. The manual also does not encapsulate the various types of knowledge in the notion of integrated and applied knowledge. Due to this lack, the vision of teachers inferred in the NAAC criteria may point to 'technicians who may be able to replicate performance in similar contexts, but who are severely challenged when the context changes' (DHET, 2015, p. 9) as they are not prepared to continuously make reasoned choices depending on the situation and learners based on the broad and integrated knowledge. Given the importance of ITE that may shape the work identity of practitioners and influence their future work, communicating a clear vision of teachers based on the latest knowledge is important in TE policies including accreditation criteria.

Summary of criteria analysis

Compared to the input-focused checklist type of criteria used by the pre-2002 assessment system, the NAAC criteria clearly show the adoption of some post-ante analysis which evaluates outcomes of HE, aligned with the broad governance discourse shift. The analysis of the criteria in this section did not find a clear vision of ITE embedded in the NCTE-NAAC accreditation criteria. However, the analysis of questions specific to TE seems to suggest that the NCTE-NAAC accreditation criteria does not put emphasis

on the various types of knowledge that underpin teachers' practice but focuses on skills, pointing technician type of teachers rather than professionals who demonstrate a high level of knowledge, skills and attitude.

6.5   Concluding remarks

This chapter answers SQ 2: What are the discourses embedded in the policy of accreditation of teacher education programmes in India? It examined the concept of quality (6.2), the objectives of accreditation (6.3), and the accreditation mechanism including procedures and criteria (6.4).

What can be noted from the analysis throughout this chapter is the lack of articulated theory or concept that underpins the system of NCTE-NAAC accreditation, though the analysis revealed implicit theory and concept. This was observed in the examination of the concept of *quality*, the objective of the accreditation system, the conceptual framework for good ITE, and the vision of good teachers. This lack of explicit vision and criteria may invite different interpretations and weak consistencies in assessment.

This lack of articulated core theory and concept may be linked to the policy formulation process examined in Chapter 5, which focused on administrative matters rather than agreeing on conceptual matters. In other words, the absence of in-depth discussions in the policy formulation stage may have allowed the different and unclear views to co-exist in the accreditation mechanisms.

The next chapter discusses the key findings from the two finding chapters, synthesising and further developing them.

Chapter 7 - Discussion

7.1   Introduction

This study aims to provide an account of national education policy-making in a globalised policy context by examining an accreditation policy for teacher education (TE) programmes in India from different perspectives. The discussion chapter synthesises and discusses the key findings from the two previous chapters.

Firstly, the key findings are presented according to the two aspects in the study's theoretical framework described in Chapter 3: discourses and influences (7.2) and policy construction (7.3). The theoretical framework is used as a heuristic device for analysis, and discussion may develop beyond one specific aspect. Thereafter, implications on other aspects are discussed (7.4), followed by the reflection on the theoretical framework (7.5). The chapter ends with concluding remarks that reflect the study in the context of globalising education policy (7.6).

7.2   Key findings in the aspect of discourses and influences

The aspect of 'discourses and influences' is concerned with international and national macro social, political, economic conditions, ideas and trends that shape policy discourse. Regarding this aspect, there are two important factors that were already extensively discussed in the previous chapters, and the discussion is not repeated here. First is the growing demand to prepare more qualified teachers and the difficulty in balancing supply growth and quality. Second is the strong influence of neoliberal discourses on education policies in India. In addition to these, I raise two more factors as to what seemed to have shaped the policy discourses in the study: global popularity of accreditation policy (7.2.1), and the changing role of the nation-state in policy-making (7.2.2).

7.2.1   Global and local popularity of accreditation policy

As reviewed in Chapter 3, external quality assurance (EQA) in HE is one of the widespread education policies that have originated in the Global North and has been adopted in less developed countries (Hernes and Martin, 2008; Stensaker, 2018a). This can be considered as one of the global education policies (GEPs). With the rise of EQA, the accreditation approach, in particular, emerged as a strong global trend (Harvey & Williams, 2010; Westerheijden, 2001), which Danø and Stensaker (2007) call the 'age of accreditation'. As examined in Chapter 5, the popularity of employing accreditation as

a modern regulatory mechanism in HE was also observed in India before the study's policy-making in 2002, including the establishment of the NAAC in 1994 and the adoption of accreditation approach by several discipline-specific regulating bodies. This made accreditation pre-determined approach in the policy formulation of the study. It seems reasonable to conclude that the global and local popularity of accreditation in HE at the time of the policy-making was behind the NCTE-NAAC accreditation policy formulation.

This not only indicates familiarity of national actors with the idea of accreditation but also points to internalisation of discourses underpinning accreditation. Although the studied policy-making has limited direct involvement of international actors, the examination of interview data in Chapter 5 suggests that national actors had taken neoliberal framing of education such as outcome measurement, comparability, competition, incentive and accountability. This may suggest that processes of globalisation had resulted in the changes in the national policy-making space (Sassen, 2008), as discussed in the literature review, in which the influence of globalisation appears in less direct ways. This emphasises the importance of studying how the 'global' impacts on the 'national', while acknowledging interdependency of actors and the movement of ideas in framing policies (Ball, 2016b).

7.2.2 Struggling to adjust to the changing role of the state in the context of governance shift

The examination of the policy formulation in Chapter 5 indicates that the introduction of the NCTE-NAAC accreditation policy was brought about by the perceived need of new mechanisms to regulate teacher education institutions (TEIs) in the changing landscape caused by privatisation and massification of TEIs in India. This section further contemplates the changing context and the perceived needs of regulation that influenced the policy-making of this study. From the analysis in the finding chapters, I argue that the changing role of the nation state in the shifting governance paradigm as well as the difficulty of adjusting the governance mechanism emerge as key factors that shaped the context of the policy-making in the study.

The literature argues that although neoliberalism is supposed to have led to deregulation, paradoxically, it seems to have resulted in more regulation in many spheres (Braithwaite, 2008; Levi-Faur, 2009). As Majone (1996, 1994) had predicted with the 'rise of the regulatory state', regulation has become one of the main governance forms, and the breadth of its spread has led some authors to conclude that we are witnessing the rise of a new type of political economy, namely 'regulatory capitalism' (Gilardi and Maggetti,

2011; Levi-Faur, 2005). As discussed in the literature review, the state under neoliberalism is argued to have moved away from the interventionist state characterised by centralised administration and service provision, and has instead restructured itself and reasserted the public sphere through new means involving regulation and regulatory governance (Levi-Faur, 2009; Majone, 1994). In the context of the rapid growth of private actors and private funds in the education space in South Asia, the importance of regulations is particularly great (Chudgar and Aslam, 2020).

This new mode of state control as regulators rather than direct providers gave rise to Independent Regulatory Agencies (IRAs) in many countries (Gilardi, 2005; Maggetti, 2010a; Majone, 1994) in the context of proliferation of agencies of different kinds ("agencification" as often labelled) and the delegation of authority to such bodies (Bach et al., 2012; Lægreid and Verhoest, 2010). This can be understood as the state enhancing mechanisms for control at a distance in response to a demand for public accountability, while delegating authority in multiple and diverse ways. The outsourcing of the regulatory tasks from the core bureaucracy to specialised agencies is caused not only by the increasing demand on regulation instead of direct intervention, but also explained by other factors such as the need to respond to greater technical and international demands on national policy-makers in the context of globalisation, and the need for credible commitments beyond electoral cycle (Gilardi, 2002; Thatcher, 2004).

This trend is also found in India, where there exist a number of IRAs. Their importance in the Indian governance is recognised, and can be exemplified by that fact that *The Indian Journal of Public Administration* had two special issues in 2018 dedicated to *Independent Regulatory Authorities in India: A Comparative Perspective*. In its editorial, Singh (2018) observes that the wave of IRAs in various sectors in India came with a rush in the early 1990s due to a paradigm shift in the economic policy regime towards neoliberalism and privatisation in India. As discussed in Chapter 2, India made a systemic shift to a neoliberal economy in the early 1990s with greater reliance on market forces including privatisation and the restructuring the role of government (Ahluwalia, 2002; Joshi and Sanyal, 2004). The establishment of the NCTE as statutory regulatory authority in 1993 and the establishment of the NAAC in 1994 can be located in this context. To meet the demand of producing more qualified teachers, the government chose to allow privatisation instead of increasing public providers and tasked the NCTE to regulate such an increased number of providers.

Re-examining what has been discussed in the finding chapters in relation to this governance paradigm shift in India with the changing role of state may provide alternative perspectives. One such point regards the general understanding of where the responsibility lies. The creation of IRAs such as the NCTE and other types of a specialised agency such as the NAAC implies shifting regulatory authorities from core bureaucracy to agencies. This alteration might have allowed the core bureaucracy to shift responsibility and blame, by providing a buffer between the core government and responsibilities of difficult tasks. Thatcher (2004) argues that this is one of the implications of IRAs, especially when the government needs to make a necessary, but unpopular policy choice.

Indeed, the NCTE as the regulatory authority has been blamed for failing to fulfil the responsibility of effectively regulating TEIs. This blaming is found in the literature (Mythili, 2018; Singh, 2016), newspaper articles (Maheshwari, 2007), and government documents (Government of India, 2020, 2012; Singh, 2016). For instance, as quoted in Chapter 5, a Review Committee constituted by the MHRD in 2007 under the Chairmanship of Sudeep Banerjee concluded that the NCTE had failed in its endeavour to regulate TEIs in India (Singh, 2016). Similarly, Chapter 5 finds that the report produced by the Commission appointed by the Supreme Court, *Vision of Teacher Education in India, Quality and Regulatory Perspective* concludes that many of the institutions given recognition by the NCTE did not meet the requirements set by the NCTE (Government of India, 2012).

However, Chapter 2 suggests that the regulation of TEIs in India had always been considered weak, which was the original reason for establishing the NCTE in 1973. Chapter 5 also discussed that the task of regulating TEIs was becoming increasingly difficult and complex in the changing context of TE in India with privatisation and massification. The judgement of the Supreme Court for the NOC requirement in 2003 discussed in Chapter 2 observes the following:

> There are only four Regional Committees [of the NCTE] in the whole country and therefore, each Regional Committee has to deal with applications for grant of recognition from several States. It is, therefore, obvious that it will not only be difficult but most impossible for the Regional Committee to itself obtain complete particulars and details of financial resources, accommodation, library, quality of qualified staff, laboratory and other conditions of the institution which have moved an application for grant of recognition. The institution may be located in the interior of the district, in a far away state. The Regional Committee cannot perform such a Herculean task and it has to necessarily depend upon some other agency or body for obtaining necessary information. It is for this reason that the assistance

> of the State Government or Union Territory in which that institution is located is taken by the Regional Committee (NCTE, 2003a, p. 24).

The statement suggests that the Supreme Court in 2003 assessed that the NCTE had the 'Herculean task' that could not be completed without assistance. The difficulty of the task also included a large number of petitions concerning private TEIs that the NCTE had to handle (Government of India, 2012). The assessments of the situation indicate that the NCTE was given the tasks that had always been and was becoming increasingly difficult. Put differently, by establishing the NCTE as a statutory body at the early stage of privatisation of TE, the core government, such as the MHRD or elected government seem to have managed to outsource the difficult responsibilities. Although blaming the NCTE for failure of regulating private TEIs may be legitimate, recognising the way the altering macro context influenced the measures and responsibility to regulate TEIs seems important to locate the policy of the study in context.

As one of the important implications of IRA, the literature suggests that IRAs possibly alter the modes of political interaction (McGowan and Wallace, 1996; Pollitt and Bouckaert, 2004; Wilks and Bartle, 2002). This seems to be shown in the analysis of the study. The finding chapters indicate that removing authority from the central bureaucracy and delegating it to various agencies may have constrained the governments' ability to reform and create coherent policies. For example, the analysis of policy formulation process in Chapter 5 suggests that the central government, the MHRD, only played an indirect role, such as making "suggestions" for the NCTE and the NAAC to talk and commissioning various studies. The NCTE did not consult the MHRD in the policy formulation, as reported in Chapter 5, because '*It was the responsibility of NCTE to see whether the quality of teacher education is maintained in the country*' and therefore the '*NCTE itself could take the decision*' (NCTE1, senior official, NCTE). This is legitimate as the government delegated authority to regulate TE to the NCTE.

In addition, insufficient coordination on TE regulation between different entities emerged in the interview. Although there were many actors that had some delegated authority concerning the governance of degree-level TE colleges such as the NCTE, universities and state governments, there was no formal coordination mechanism among these entities, according to the interview data (NAAC2, consultant, NAAC). On the contrary, several interviewees indicate a difficult relationship between universities and the NCTE as some universities regarded the NCTE regulation as a thread to their academic autonomy. For instance, there was a court case mentioned in the interview that exemplifies the difficult relationship: the case over whether the NCTE regulations are

applicable to universities with autonomous status (University of Calicut vs National Council For Teacher Education, 2003, AIR 2004 Ker 295). The increasingly complex governance of TE with multiple actors having different degrees of authority within unclear hierarchies seems to complicate interaction amongst policy-makers and make it harder for the central government to create and maintain coherent policies. This altered interaction of policy actors appears to be an important context that shaped the policy formulation of the study.

Lastly, another point that emerged from the analysis in relation to the altered role of the state and the difficulty of coordinating different government entities is the notable role the judiciary played in mediating policy coherence in the study. Some court cases that settled the disagreement between the policy actors are referred in previous chapters: requirement of NOC from the state governments for NCTE recognition (Chapter 2); recognition of 291 TE colleges that had been given by the Western Regional Committee of the NCTE in 2008 despite the explicit recommendations of the Government of Maharashtra not to do so (Chapter5). As explained in Chapter 5, the case of the Government of Maharashtra reached the Supreme Court that formulated a Commission led by Justice Verma, and its recommendations had led to a wide range of reforms in TE including the one for reviewing the accreditation function of TEIs. This role of the judiciary may be understood from the perspective that both judicial and quasi-judicial procedures including IRAs are rule-based systems, which enforce regulations (Cerny, 2008). The literature also recognises that legislatures or court can be important engines for regulatory expansion and critical actors in the regulatory space where the judiciary strengthens public accountability (Krishnan, 2018; Levi-faur, 2011). In this study, the judicial system seemed to have used its mediating power to provide a platform for interventions in the complex governance when there was an absence of the state at the centre as a result of delegating authority. Batra (2014) also writes that within the influence of neoliberal policy discourses in India, the entitlement input-based approach to education are legally managed and increasingly enforced by the courts. This apparent weak ability of other stakeholders to hold government actors accountable for their performance is a serious problem. In these instances, policy-making power was removed from the ambit of public authorities to that of the judiciary. In the long term, this may create problems in democracies about the separation of powers.

Overall, while increased regulation mechanisms may appear to be an intensification of state control, closer examination in this section seems to suggest weakening and fragmentation of state control. The literature also points out the weakening of the state

as the primary provider of education in South Asia, in the context of limited state financing and the rise of private participation in education (Chudgar and Aslam, 2020).

7.2.3 Summary – discourses and influences

This section discussed how the international and national macro social, political, economic conditions, ideas and trends shaped policy discourse of the policy-making. The international and national popularity of accreditation in HE influenced the policy formulation in this study. Moreover, macro governance shift in India under neoliberalism with the delegation of authorities including creating IRA was an important context that influenced the policy as well as policy-making process of the study.

The discussion in this section indicates that not only central government but also international discourse trend, sub-national entities and specialised agencies are becoming important in the policy-making of the modern era. The concept of multi-level governance may be useful to describe this point. Hooghe and Marks (2001, p. 3) defines multi-level governance as 'the dispersion of authority away from central government upwards to the supranational level, downwards to subnational jurisdictions, and sideways to public/private net-works'. Consequences and implications of multi-level governance in the study are further discussed in later sections.

7.3 Key findings in the aspect of policy construction

The aspect of 'policy construction' has to do with policy problem setting and policy text production including political agendas and struggles of actors and influencers. Policy problem setting and policy text production are closely interrelated, as discussed in Chapter 3, since both problems and solutions are given shape in policy discourse and how the problem is framed limits subsequent thoughts and actions (Bacchi, 1999; Goodwin, 1996; Stone, 2012). Though the policy construction was extensively examined and discussed in Chapter 5, there are four points related to policy-making that can be further discussed. Another important point here, though the discussion is not repeated, is that the policy of the study went through constant changes and re-formulation throughout the policy cycle, as discussed in Section 5.4.

7.3.1 Differing objectives of actors

The analysis in Chapter 5 suggests that the policy formulation process in this study was smooth and contest free. However, Chapter 6 indicates that no struggle between actors in policy-making did not necessarily mean that they were in accord. It found that the key actors involved in the policy formulation, the NCTE and the NAAC, had a different

understanding of the objectives of accreditation, and each organisation seemed to have interpreted them according to their organisational discourses. This difference did not emerge during the policy-making process, as administrative and technical discussion may have concealed the differences in understanding and potentially conflicting agendas.

As discussed in the literature review, Ball's policy cycle calls attention to the need to understand the histories and ideologies of the people who receive and enact policies, as policies are remade and reworked through the process (Ball, 1994; Cochran-Smith et al., 2013). In a similar manner, the two organisations that participated in the policy-making also interpreted the policy according to their organisational discourses. This seems to suggest the importance of understanding the histories and ideologies of the people and organisations that make policies.

7.3.2 Policy-making by agencies

As discussed earlier in 7.2.2, there is an extensive literature on the proliferation of agencies in the context of New Public Management (NPM), referred to as "agencification", and the delegation of authority to such bodies (Bach et al., 2012; Lægreid and Verhoest, 2010; Verschuere, 2009). Agencies here mean public sector organisations structurally separated from the government offices, whose main task is usually a form of policy implementation, such as service delivery, regulation or exercising different kinds of public authority (Bach et al., 2012). The earlier discussed IRA is a public agency that has the task of regulation. In this study, both the NCTE and the NAAC are public agencies, and the policy of the study was formulated by these agencies. This section discusses policy-making by agencies.

The first point to consider is legitimacy. Although the NPM rhetoric claims 'policy/ operations divide', which assumes that politicians decide on policies while administrative agencies implement these policies, the literature suggests that the involvement of agencies in policy-making is quite common even in contexts where norms of separating policy and operations prevail (Bach, 2012; Bach et al., 2012; Maggetti, 2009; Verschuere, 2009). While the literature discusses varied consequences of the agencification of the policy process, possibly the most important argument is the legitimacy of agencies in policy-making. Agencies are highly specialised bodies that hold considerable public authority while enjoying the highest discretion as they are separated from the ordinary bureaucracy and elected politicians (Gilardi and Maggetti, 2011; Majone, 1996). Policy-making by agencies that are not under the direct control of elected officials has important implication for the democratic accountability of policy-making, producing a 'democratic

deficit' (Gilardi and Maggetti, 2011; Maggetti, 2010b). According to Majone (2005), the political 'principal' can transfer his powers to the independent delegate, but not his legitimacy; hence agencies rely on other external sources of legitimacy; and the proliferation of agencies implies a 'net loss' of legitimacy for the political system (Maggetti, 2010b).

The policy-making of the study is re-examined from the point of legitimacy. Chapter 5 found that the MHRD, the central government institution headed by a minister, was not involved in the policy-making process. The NCTE officials did not consult the MHRD during the policy formulation, as '*It was the responsibility of NCTE to see whether quality of teacher education is maintained in the country*' and therefore the *'NCTE itself could take the decision*' (NCTE1, senior official, NCTE). It is correct to state that regulation setting is within the NCTE's official mandate since rule-making authority in TE is delegated to the NCTE in India, but the question around the legitimacy of agency's involvement in policy-making is relevant. Moreover, while arguably one alternative source of legitimacy of agencies is the positive evaluation of performance by citizens (Maggetti, 2010b), as discussed earlier, the NCTE did not seem to be perceived to have the capacity of producing satisfactory output.

Another point to consider is expertise of the agency. The agencies' contribution to policy formulation by and large are based on their experiential knowledge derived from policy implementation (Bach et al., 2012). Specialised agencies are expected to possess expert-based knowledge that politicians and bureaucrats lack, which is considered indispensable for the provision of the best solution to a given problem and for increasing the efficiency of decision making (Maggetti, 2010b, 2009). This justification seems to be widely accepted, and some authors argue that in favour of function connected to such specialised expertise, the principles of representative democracy may be weakened (Papadopoulos, 2003).

The discussion on expert-based knowledge as a justification of the agencies' involvement in policy-making is also found in the study. As discussed in Chapter 6, the 2002 MoU agrees that the NAAC and the NCTE jointly set *the Accreditation Norms and Standards*, i.e. the accreditation criteria for the country, which TEIs are expected to comply with. However, Chapter 5 found that the NAAC took the leading role in developing such criteria of accreditation. Interview data of the NCTE officials suggest that it was done due to the NAAC's expert-based knowledge on accreditation. NCTE3 explains as '*You [the NAAC] have the expertise. You have the experts with you so whatever best*

you decide we can do it' (NCTE3, senior official, NCTE). This de facto transfer of authority from the NCTE to the NAAC raises two questions. The first is the NAAC's weak expert-based knowledge on TE, weakening the justification in leading the criteria setting. Although the NAAC is the expert agency of assessment and accreditation, it did not hold discipline experts, as NAAC2 explains '*No high-ranking academic staff are there. So, their operation is very limited in scope. Therefore, they do not have academic weight*' (NAAC2, consultant, NAAC). Second is the question of legitimacy, following the earlier discussion. The NAAC led to set the TE assessment criteria for the country, while the NCTE is the one with authority and mandate to regulate TE. Thus, it can be understood that the NAAC relied on the external sources of legitimacy, producing a 'net loss' of legitimacy (Maggetti, 2010b; Majone, 2005).

The NCTE's reliance on the NAAC for defining *quality* as assessment criteria may be linked to insufficient acknowledgement of the importance and effect of the task. However, defining *quality* is a crucial and difficult task as discussed in the literature review. Moreover, as discussed in Chapter 6, the set criteria encourage compliance to government preferences and a reduction of variation, since the criteria and standards communicate a detailed framework of preferences against which institutions know they will be judged (Harvey, 2002; Martin & Stella, 2007). What happened here seems similar to "informal agency policy-making" where guidelines, which are developed with little participation and which are immune from judicial review, can prompt significant changes in behaviour from those the agencies regulate (Mendelson, 2006). Mendelson (2006) argues that when agencies make policy informally, stakeholders suffer distinctive loss to their ability to participate in the agency's decision and to invoke judicial review, which seems applicable to the study.

This section examined policy-making by agencies. The discussion indicates problem framing is linked to not only the content of the policy but also the policy-making process. The more technical the manner in which the issues in question are framed, the more justification there may be to delegate policy-making authority to specialised agencies due to its expert-based knowledge.

7.3.3 Absence of the voice of stakeholders

Another notable point in the policy-making process of this study is the absence of the voice of important stakeholders. Stakeholders may include individuals with expertise in a particular policy domain, representatives of social groups that may be impacted by the policy development, or the general public (Rowe and Frewer, 2000). In this case,

stakeholders may be TEIs as the entities regulated; affiliating universities that have a similar responsibility to ensure the quality of TE colleges; state governments that employ graduates; and regulatory beneficiaries such as students and parents who expect better education as a policy outcome. However, Chapter 5 found that policy formulation in this study was a top-down process that only involved the NCTE and the NAAC officials and their consultants, without broad consultation of stakeholders.

The theory of stakeholder engagement in policy-making can be found in the early ideas of community participation and public involvement that are central in the basic democratic belief that citizens should decide for themselves how government and their community should operate (Byrd, 2007; Fiorino, 1990; Nanz and Steffek, 2004). Curry (2001, p. 561) suggests that the acceptance of the idea was the 'inevitable consequences of a mature democracy placing more rights and responsibilities on its citizens and less on the state'. Participation is analysed as a democratic tool that increases stakeholders' and public confidence in the policy-making process, which legitimises the decision-making procedures (Boussaguet, 2016; Weiler, 1985). Stakeholder engagement in public policy formulation is argued as crucial also for increasing the performance of policies through creating access to broader information and resources that stakeholders possess (Fischer et al., 2014; OECD, 2005; Schalk, 2017; Weiler, 1985).

However, it is also important to recognise that participatory rhetoric could be used for symbolic purposes and there is also a dearth of empirical data on best practices for stakeholder engagement in the policy-development arena (Boussaguet, 2016). Moreover, although the majority of empirical studies have found a positive link between stakeholder involvement and policy performance, recent research has demonstrated diminishing returns of involvement on performance (Schalk, 2017).

In this study, the earlier discussion on how the NCTE officials perceived accreditation as something that required expert-based knowledge of accreditation, thus relied on the NAAC, may be linked to the absence of voice of stakeholders. This belief might have resulted in a stronger reliance on the specialised agencies and their expert opinions, which in turn may have devalued local stakeholders' opinions and preferences. This may have had serious social justice implications for citizens, as this type of policy-making leaves limited means for citizens' political contestation.

7.3.4 Tension and contradiction between and within policies

No policy works in isolation in practice, and it is important to study interrelated policies, i.e. 'policy ensembles', rather than studying a single policy (Ball, 1993). While Chapter 6 extensively discussed the policy text of the study, further points regarding tensions and contradictions observed between the NCTE-NAAC accreditation policy and other related policies are discussed in this section. Three levels of tension are presented below: the policy of the study with macro-policy, with the related policies, and within the policy.

The first point concerns the standing of the NCTE-NAAC accreditation policy within macro policies in India at that time. There is one critical limitation with the NCTE-NAAC accreditation policy regarding its use for regulating TEIs, which is that it only covered degree-level TEIs. According to the mandate, the NAAC under the UGC only assessed and accredited degree-level HEIs, which excluded most of elementary teachers' preparation courses since they are diploma-level. For efficiency of a system as a whole, it would have been beneficial to have had a coherent approach towards TEIs regardless of the levels. In fact, in the interview with NAAC1, it was found that Karnataka State had requested the NAAC to cover all the TEIs in the State, including those for primary teachers, but the NAAC had to decline as it was deemed beyond its competence, even though NAAC1 personally agreed that it would have been desirable (NAAC1, senior official, NAAC). Delegating authorities in diverse ways, discussed earlier, seemed to have prevented a coherent approach in this instance.

The second point regards the unclear relations and hierarchies among the related policies including the NCTE-NAAC accreditation policy, the affiliation system, and the NCTE recognition. As discussed in Chapter 5, each system assesses the quality of TEIs and programmes using their own indicators, and unclear relations among them seem to leave room for tension, incoherence or duplication of work. For example, according to the interview data, some prominent universities resist applying for the NCTE-NAAC accreditation due to academic autonomy. The earlier quoted court case is another example of the tension between universities and the NCTE recognition: the different student-teacher ratio set in the NCTE recognition norms and the UGC norms for university affiliation had to be settled in court (University of Calicut vs National Council for Teacher Education, 2003, AIR 2004 Ker 295). This point appears to relate to the discussion in 7.2.2, delegation of policy-making authorities, without the mediation of strong central authority to ensure coherence between policies.

The third point concerns the tensions and contradictions found within the NCTE-NAAC accreditation policy documents. Chapter 6 demonstrated that the policy documents

seem to contain different perspectives and intentions of the NCTE and the NAAC. It also found that the logic of the 'self-appraisal report being the core for institutional improvement' may be inconsistent with the kind of criteria and questions set in the self-appraisal report, for they fail to communicate the clear vision of TE. In other words, it seems the policy intention is not well translated in the operational documents.

These tensions and contradictions between and within policies are further discussed using the concept of policy coherence. Nilsson et al. (2012, p. 396) define policy coherence as 'an attribute of policy that systematically reduces conflicts and promotes synergies between and within different policy areas to achieve the outcomes associated with jointly agreed policy objectives'. In the academic field, work on policy coherence has identified different types of coherence, such as vertical and horizontal (between policy areas at a different level or on one level), internal and external (within a single policy domain or between different policy domains) (Hoebink, 2005; May et al., 2006; Nilsson et al., 2012; Nuttall, 2005). Nilsson et al. (2012) also suggest distinguishing between policy objectives, policy instruments and implementation practices for policy coherence analysis. This analytical framework is useful to examine coherence of a policy at a different stage, highlighting how policy intentions could be interpreted and distorted at different stages of policy implementation.

Using these analytical frameworks, the three discussed points are re-examined. The first point seems to be an issue with vertical coherence, i.e. between macro policy to regulate all TEIs and the NCTE-NAAC accreditation policy covering only a segment of TEIs. The second point may be described as problems of internal and horizontal coherence, as it concerns different policies in the same domain, i.e. TEIs regulation, which do not have a clear difference in the hierarchy. The third point concerns coherence within a single policy between policy objective and instruments. As such, policy coherence analysis can be applied within a single policy domain as well as between different policy domains, both horizontally and vertically, and between different stages of the policy cycle. This is an important exercise, as the degree of coherence between multiple policies or within different stages of single polity will affect outcomes and impacts (Nilsson et al., 2012).

Nilsson et al. (2012) argue that improving policy coherence requires addressing the integration of the policy-making process upstream, such as analysis of interactions between policy outputs and implementation practices, interaction of organisational arrangements and mandates, and administrative procedures. Following this argument, the policy conflicts and tensions identified in the study could have been reduced through

more deliberate policy integration effort through analysing interaction with existing policies during the policy formulation. Such efforts were not found in the analysis of policy formulation in Chapter 5. Moreover, Chapter 5 and 6 found that the objectives of the policy remained vague and had not been precisely discussed or defined during the policy-making process or in the policy texts. Nilsson et al. (2012, p. 399) argue that 'it is well known in policy making that conflicts are often hidden at the higher levels of abstraction such as overarching goal formulations and strategies, in order to facilitate the adoption of decisions', and '[t]hese conflicts may come to the fore in the selection of instruments and how these instruments are applied on the ground'. The vagueness of policy objectives found in the study may have posed difficulties for policy coherence.

The analysis in this section suggests that policy construction phase holds the key for policy coherence, though the conflict may become clearer at a later stage. Put differently, the examination of policy construction may reveal potential implications for implementation. Furthermore, the issues of policy coherence may have a link with the previously discussed point of the absence of strong policy mediation by the central government, as May et al. (2006, p. 381) found in their case study in the USA that 'the greater policy coherence exist for policy domains that have dominant congressional committees or have more involvement of lead federal agencies'.

7.3.5 Summary – policy construction

This section discussed policy construction of the study, which highlighted differing understanding of policy actors, policy-making by agencies, absence of the voice of stakeholders, and policy coherence. All four themes are inter-related, and also link to the context of the shifting governance discourse and proliferation of agencies discussed in Section 7.2.2. Overall, the discussion on policy construction seems to highlight the technical nature of policy-making by agencies with a narrow focus without wider consultation or examination of relations with other policies. Specificities of agencies in this study seem to have influenced not only the content of policy text, but also important choices in policy-making processes including who is involved and who is absent in the policy formulation process; which stakeholders' expertise or opinions are heard and valued; how many details are discussed and consulted; how they are, or are not, used in a judgement. Bach et al. (2012) argue that reserving the policy-making for the expert agencies rather than elected politicians and without stakeholder engagement suggests technology, not democracy

7.4   Implications

The theoretical framework to understand policy presented in Chapter 3 has four aspects: (i) discourses and influences, (ii) policy construction, (iii) policy in practice and (iv) impact. The study focuses on the first two aspects, which have been discussed in Section 7.2 and 7.3. What is discussed in this section are the potential implications on the remaining two aspects, (iii) policy in practice and (iv) impact, as they emerged through the analysis of the study. In other words, the specificities of construction of the policy in a specific context seem to have shaped some elements of policy in practice and impact. Three such points are presented, two for policy in practice and one for impact.

7.4.1   Policy in practice: enactment of policies

Policy in practice relates to how policies are interpreted and implemented in the actual context of practice, especially in terms of individual and collective response, acceptance and resistance, and (un)intended consequences. While examining the policy text and the envisaged mechanism of the NAAC-NCTE accreditation, three interrelated instances were discussed in Section 6.4.1 where actors' behaviour or experiences deviated from the expectation of the policy. First was the use of external consultants to prepare self-appraisal reports due to lack of human resource, while self-reflection during the preparation is considered the backbone of the accreditation for quality improvement. Second was that the cultural difficulty of being a critical peer reviewer, though the critical and independent assessment is the essence of accreditation procedures. Third was the influence of political relations between organisations on judgement, resulting in the NAAC to give accreditation to almost all applicants. These instances suggested difficulties to fulfil assumptions made for each of the three key steps of accreditation, i.e. self-evaluation, critical assessment of reviewers, and judgement based on evidence, indicating a potential misfit of the global accreditation model to the Indian context. As discussed in the literature review, concerns have been articulated over similarity of accreditation methods and transferability, especially in less developed countries where the contexts are significantly different (Harvey & Williams, 2010). The relation between the policy intention and policy in practice is further discussed in this section.

Recently, the concept of policy enactment has been deployed for education policy research, as opposed to policy implementation (Ball et al., 2011). The term 'enactment', as used by Braun, Ball, and Maguire (2011) denotes the dual process of policy interpretation (making sense of policy text) and translation (rereading of policy through actions) shaped by the diverse, dynamic, and specific context of policy actors. They suggest four overlapping and interrelated 'contextual dimensions' to offer analytical

framework: situated contexts, professional cultures, material contexts and external contexts (Ball et al., 2011, p. 21). This concept is useful to make sense of the complex processes in which policies are enacted within a specific context. Through this analytical lens, the three examples above may be explained as the actors translate the policy to make it fit their understanding of local reality. The first case is material context (staff capacity), and the second and the third case is a combination of professional culture (value of being a critical reviewer) and external context (pressure to maintain relationships), that seem to have influenced how the actors enact the policy. In each example, the actors' enactment enabled them to find ways to produce the expected outcomes within the restrictive context. By doing so, all those involved achieved immediate gain, either winning accreditation status or maintaining good relations with other people or organisations.

These gaps between the policy intention and policy in practice may derive from the misfit of the globally standardised accreditation procedures in the local context. The actors' choice to enact the policy to make it fit the local context seems strategic and pragmatic choices. This, however, may have been detrimental to the long-term goal of improving TE in the country. Lehmann and Gilson (2012, p. 358) similarly argue on actors' policy interpretation that 'While each had a limited impact on policy outcomes, their cumulative effect produced a significant thinning down of the policy's intent'. Moreover, by manoeuvring to fulfil the expectations, actors may be regarded to have contributed to reinforcing the existence of an unsuitable system and structure.

7.4.2 Policy in practice: symbolic policy

While a public policy includes the allocation of tangible as well as symbolic rewards (Hy, 1978; Slaven and Boswell, 2019), I argue that the introduction of the NCTE-NAAC accreditation policy in this study has important symbolic properties. Put differently, the act of introducing the policy seems to have had an important value for the NCTE apart from the actual implementation outcome. As contextual information, it may be useful to remind the reader of the slow implementation as discussed in Section 5.4, where the NAAC accredited only less than 10% of TEIs in the country during the 15 years of the NCTE-NAAC collaboration, which is suggested as the reason for terminating the collaboration between the NCTE and the NAAC (NCTE, 2017).

The literature examining symbolic properties of policy often employ the observation of differences between policy intention and outcomes (Slaven and Boswell, 2019), which seems reasonable as symbolic policies are often considered being adopted without the

intent of being fully implemented, unlike material policies (Gustafsson, 1983; Krause, 2011). Following this, the key points from the finding chapters concerning the extent and type of follow-through made for implementation such as apparent commitment of actors and budget allocation is summarised. Section 5.4 suggests that the NCTE did not take explicit follow-up measures to change the poor implementation status until it was forced to start a wide range of reform following the Justice Verma Commission Report (Government of India, 2012). One notable action the NCTE took was changing *the NCTE Regulation* to use the NCTE-NAAC accreditation when applying for opening new courses in 2009, but the analysis in Section 5.4 suggests that it was done to respond to a problem rather than out of commitment to promote the NCTE-NAAC accreditation. NAAC2 describes the attitude of the NCTE after the signing of the MoU as follows: '*From then on [after the MoU], NCTE's quality concern has been handed over to NAAC*' (NAAC2, consultant, NAAC), which suggests inactive follow-through for the implementation. While budget allocation also indicates the extent of the intent of implementation (Krause, 2011), the NCTE-NAAC accreditation implementation did not have a specific budget since applying organisations pay fees to cover the cost. Overall, the NCTE's commitment to full implementation seems weak, which is consistent with the characteristics of symbolic policy.

Although discussing symbolic policies from the perspective of a lack of follow-through to fully implement policy is legitimate, a more relevant way of seeing symbolic properties of policy is to see its effects beyond implementation (Boussaguet, 2016). Symbolic interventions are designed to signal to an audience that the government is committed to certain values or goals instead of seeking to change outputs in an instrumental way to pursue concrete policy ends (Slaven and Boswell, 2019). In this case, the analysis in Chapter 5 indicates that the reason for introducing the policy was to respond to the pressure from the MHRD to address the concern over the quality of TEIs in the context of privatisation and massification. Thus, the primary audience of the policy as symbolic policy may be considered to be the MHRD and the objective may have been to signal commitment of the NCTE to tackle the quality concern. The secondary audience in this case may be TEIs and public to signal the said commitment as well as the way the NCTE handles the quality issue.

The literature also discusses theoretical explanations of symbolic policy-making. What Slaven and Boswell (2019) term 'compensation' as one of the strategies behind the use of symbolic policy may be applicable to the NCTE-NAAC accreditation policy. This means that it diverted attention from, or compensated for the divergence between the

popular policy preference and actual capacities of policy-makers. As discussed in Chapter 5, the NCTE was then grappling with the increasing number of applications for opening TEIs, which left little capacity to handle additional tasks. The gap between expectations from the MHRD and the capacities of the NCTE at that time may have encouraged the NCTE to choose cosmetic adjustments that did not require much actual work. Put differently, the primary outcome may have been to defuse the tension between the demand of the MHRD and the institutional constraints, rather than full implementation of the policy.

Furthermore, this tension and the use of symbolic policy may be argued to be the result of the central government giving difficult tasks to IRA without sufficient support of policy mediation as discussed in Section 7.2.2. In fact, Gustafsson (1983) in his seminal paper argues that use of symbolic and pseudo policies increase in the context of rapid economic, political, and social changes where decision making processes have undergone a series of fundamental changes. According to Gustafsson, this is because politicians are pressured by lack of economic resources, time or relevant knowledge in a rapidly changing context, but still have to make decisions even when they are unsure of what to do. This description seems applicable to the context of the study where the delegation of state authorities in India seemed to have given the NCTE difficult tasks to regulate TEIs without sufficient support. Gustafsson argue that in such a context, politicians may therefore make policies of a symbolic type which will help them muddle through their political difficulties, but which for the time being are not going to directly affect their business. The use of symbolic policies does not indicate bad intention of actors but rather that they 'usually try to do their best confronted with organizational, ideological, and other restraints' (Gustafsson, 1983, p. 271). This interpretation seems relevant to the study given the pressure, difficulty and magnitude of the task, and limited resources of the NCTE at that time, as discussed in Chapter 5. In fact, the introduction of the policy seemed to have helped the NCTE to dissolve the tension and buy time without affecting their own business. However, in the long run, it may have decreased rather than increased the capability of the NCTE to successfully achieve their mission to effectively regulate the quality of TEIs by diffusing the power and giving difficult responsibility to the NAAC.

In addition, I also argue that the introduction of the NCTE-NAAC accreditation laid the foundation for stronger policies that were brought later. The following descriptions of symbolic policy by Hy seems to match the evolution of the case study policy:

> Tangible policy alterations are most likely to be accepted by the people after they have been introduced to such changes via symbolic policy. When the stage is set by symbolic policy, tangible policy changes appear incremental and, thus, less disruptive because the people perceive such changes as extensions of existing programs. (Hy, 1978, p. 204)

The TE accreditation policy in India also had incremental changes as it was introduced as voluntary, then changed to partially mandatory, and then became mandatory. The initial introduction of the accreditation policy possibly made subsequent changes acceptable as they were seen as the continuity of the existing policy.

Overall, the NCTE-NAAC accreditation policy seems to have been more important at the discursive level than in practice for the NCTE at the time of introduction. The analysis in this section highlights the importance of examining the symbolic role of policy since focusing only on the tangible properties of a policy may ignore the symbolic and political aspect of policies. Moreover, as Lingard (1996) argues, the Ball's policy cycle framework seems to have been useful to examine the material and symbolic policy distinction. Lingard suggests that analysis of contexts may explain differences between policies that are more material backed up by legislation as well as fiscal benefits and punishments, and policies that are more symbolic in character and which has been developed perhaps to defuse political pressures. This seems to be true in this study.

7.4.3 Impact: discursive impact as political technology

The last point concerns the aspect of *impact,* which has to do with the outcomes of policies at sociocultural level, particularly in terms of power relations, control, dominant/ marginalized discourses and groups, and (dis)empowerment of practitioners. I argue that, as hinted in the discussion of symbolic policy, the introduction of the NCTE-NAAC accreditation might have had an important discursive impact.

The introduction of the NCTE-NAAC accreditation policy in the study seems to fit the notion of *political technology*, as Morley (2004) claims is the case of the British QA system. *Political technology* is an important element of Michel Foucault's multifaceted concept of governmentality where he highlights the specific governmental rationale for raising a problem in a certain way as well as highlighting the governmental practices and technologies that are applied to solve these problems according to this rationale (Frankenberg, 2014). The term *technology* implies that forcing the analysis of politics to transcend ideologies and emphasises 'the techniques and practices that give a concrete form to this new political rationality' (Foucault, 2001, p. 410). Thus, political technologies 'advance by taking what is essentially a political problem, removing it from the realm of

political discourse, and recasting it in the neutral language of science*' (Dreyfus and Rabinow, 1982, p. 196). This section attempts to explain why the introduction of the NCTE-NAAC accreditation policy in India may be considered as *political technology*.

The analysis in Chapter 5 indicates that the key context behind the introduction of the NCTE-NAAC accreditation policy was the need to assure the quality of TEIs in the changing sector scenario with increasing privatisation and massification. This is a complex and '*essentially a political problem*' (Dreyfus and Rabinow, 1982, p. 196), as Apple (2004, p. XX) writes, 'The theories, policies, and practices involved in education are *not* technical. They are inherently ethical and political'. Thus, the policy problem requires various discussions such as how much investment the government plans for school education, how to respond to the increasing demand of teachers, how to approach privatisation, what the problem with the current governance is that is not sufficient to ensure the quality of TE, what would be the *quality* of TE that India aims for, who has a say, and what would be the role of the state and market to achieve this. These questions need to be settled after discussions about values and choices regarding TE in India, rather than finding and applying scientific value-free facts.

However, the analysis in Chapter 5 revealed that explicitly scrutinising the policy problems, their causes, policy options, and consultation with stakeholders did not occur in the policy-making process. Instead, the analysis found that the problem was vaguely framed as the problem with quality of TEIs, which the NCTE is responsible for. The only option considered to address the problem was accreditation, as the context made it appear as a "natural" choice to address quality issues. The focus of the discussions in the policy-making process was on the technicality for establishing an accreditation system. This de-politicised discourse was notable not only in the policy formulation process, but also in the policy texts. Examination in Chapter 6 found that the policy problem is not referred to in any of the examined policy texts. It further discussed that the MoU treated defining *quality* of TE in India as a technical issue and simply appointed a committee to set the criteria to measure *quality*. These findings seem to support that the policy-making of the study fits the notion of political technology, where '*essentially a political problem*' is converted into a non-political and technical discussion.

An important part of the definition of political technology is that these techniques and practices 'give a concrete form to this new political rationality' (Foucault, 2001, p. 410). The use and popularity of EQA as a neoliberal governance instrument, not a neutral

technical tool, has been discussed in the literature, though not frequently, as Jarvis describes:

> QA regimes are not benign managerial instruments – they must also be understood as part of a broader series of agendas associated with neo-liberal policy prescriptions that valorize market rationality. Of itself, this is not a new observation. It is, however, not an observation that is frequently made and typically not in the context of university administrators who, in adopting such practices and ideational approaches to the management of research, teaching and funding activities are transforming university operating environments (Jarvis, 2014, p. 164).

This point is elaborated. As discussed in the literature review, the rise of the 'evaluative' and 'regulatory' state and the introduction of what has variously been depicted as new public management (NPM) instruments have become an increasingly popular governance choice, which applied equally to the HE as Roger King terms as 'higher education regulatory state' (Christensen and Lægreid, 2016; Dill, 1998; Jarvis, 2014; King, 2007; Levi-Faur, 2005). NPM, neoliberal policies in the public sector, are characterised by a combination of free market rhetoric and intensive managerial control practices (Lorenz, 2012). The dominance of these intrusive regulatory instruments in HE including EQA seek to manage, steer and control the sector in ways that serve the interests of the state by applying specific ideational motifs driven by quasi-market like efficiency, value and performance (Westerheijden et al., 2007). Governance through regulation is not a neutral technical administrative procedure. The history of EQA in HE has been inextricably political and EQA has been used as much to engineer sector and organisational change associated with a specific rationale as it has the pursuit of excellence (Westerheijden et al., 2014).

How these ideational motifs may be observed in the study is examined below. Before the introduction of the NCTE-NAAC accreditation policy in 2002, affiliating universities and the NCTE were primarily responsible for assuring the quality of TE (see Section 2.4 for details). Following Clark's (1983) famous triangle of professional, state and market, the pre-2002 mechanisms may be labelled as a combination of state regulation by NCTE recognition and the professional self-control through university affiliation. I argue that the introduction of the NCTE-NAAC accreditation in 2002 brought new neoliberal discourse in the TE governance. Firstly, it introduced quasi-market and competitive based rationalities in public policy on TE in India. Regulatory logics provided by the EQA is argued to impose quasi-market, competitive based rationalities premised on neoliberal managerialism (Jarvis, 2014). In this case, as found in Section 5.2.2, improvement through competition was one of the objectives of introducing accreditation. This also fits in the context of increasing privatisation and massification of TE at that time.

Secondly, the arguments about teachers' performativity reviewed in Chapter 2 (Ball, 2015a, 2003; Holloway and Brass, 2018) may be applied to TEIs. It can be argued: the assessment and accreditation system provides the metrics against which TEIs can measure themselves, situating them within a perpetual state of comparison against their peers, and organise themselves to meet standardised goals. Such mechanisms enable what Ball (2003) refers to as the technology of performativity, a new mode of state regulation (Holloway and Brass, 2018). In this study, the quality criteria that TEIs are expected to comply to were set exclusively by the government, as found in Chapter 5. In this case, it can be understood that the accreditation mechanism provided the infrastructure for accountability whereby TEIs self-regulate to meet the standards prescribed by the state, allowing the state to govern TEIs from a distance. In this mechanism, TEIs are the main actors who self-regulate towards the state-determined goal, rather than the state directly ensuring the quality. This seems consistent with the description of the *NAAC manual* analysed in Chapter 6, that depicts TEIs as primary actors who 'constantly and consistently move forwards and upwards in the direction of relevance, effectiveness and credibility of the professionally [*sic*] work they are engaged in' (NAAC, n.d., p. 8). In this sense, the introduction of the NCTE-NAAC accreditation brought an instrument of 'a politics of surveillance' (Jarvis, 2014, p. 156) that 'gives power to some and removes it from others' while facilitating 'an increase in control by central authorities over desired "outcomes/ends" through deregulated "processes/means"' (Rowlands, 2012, p. 100). Accreditation is not simply a technisised mode of administrative procedures, but equally a mechanism of political power, a projection of interests and an attempt to control. In this study, this shift in discourse had taken place quietly, through the de-politicised technical policy-making processes.

This section illustrated the process where de-politicisation of policy-making quietly reshaped the discourse of role of the state in TE and installed the modern governance structure in TE in India without explicit policy debates. The arguments in this section largely follow scholars who have drawn from governmentality studies to examine how education reforms might influence how educators govern themselves and are governed by others (Ball, 2003; Burchell et al., 1991; Holloway and Brass, 2018). The discussion also links to symbolic policy, which according to Levin and Young (2000, p. 189) regards 'a view of official rhetoric as being primarily symbolic and intended to create or support particular definitions of problems and solutions'. Following this, the introduction of the NCTE-NAAC accreditation policy may be considered a surrogate for politics where

reframing of a problem and new solutions is covertly done through an introduction of a policy that has an appearance of tangible and technical policy, as political technology.

7.4.4 Summary - implications

This section examined implications of the NCTE-NAAC accreditation on the aspect of *policy in practice* and *impact,* in that policy enactment, symbolic policy, and political technology were discussed. Overall, the three themes discussed in this section seem to have roots in the neoliberal global policy reshaping the local context of TE governance. Although it is not a new observation that EQA regimes should be understood 'as part of a broader series of agendas associated with neo-liberal policy prescriptions that valorize market rationality', (Jarvis, 2014, p. 164), the fact that this was not raised in any of the interviews of the study seems important to understand the policy-making of the study. As Bourdieu (1977, p. 188) writes, 'The most successful ideological effects are those which have no need of words, and ask no more than complicitous silence'.

7.5   Reflecting the theoretical framework

This chapter has discussed the key findings of the study in relation to the two aspects, *discourses and influences* (7.2) and *policy construction* (7.3), followed by other implications (7.4). To conclude, this section presents the discussed factors in relation to the theoretical framework (7.5.1) and revisits the theoretical framework (7.5.2).

7.5.1 The emerging factors in the theoretical framework

Figure 10 maps the key factors that emerged in this policy-making and illustrates them in relation to the four aspects in the theoretical framework. Since the examination of the aspects of *policy in practice* and *impact* are limited to potential implications from the examined policy-making, they are presented in the dotted-lined boxes. Although each aspect was discussed in turn in this chapter, it is important to re-emphasise that the relationship among different aspects and factors are not linear and distinct, but cross-sectional and bidirectional. For example, key international and national contexts, such as neoliberal discourse or growing demand of TEIs, not only influence the policy construction but also how the policy was interpreted and enacted in practice.
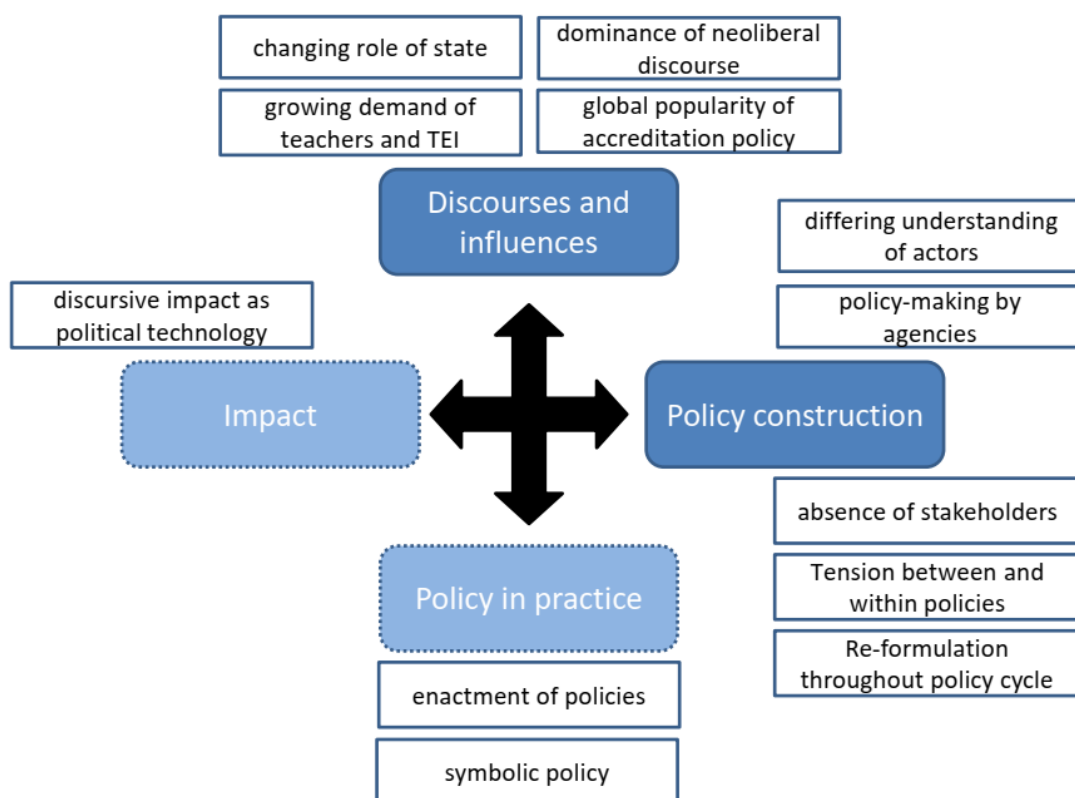
changing role of state

dominance of neoliberal discourse

growing demand of teachers and TEI

global popularity of accreditation policy

Discourses and influences

differing understanding of actors

policy-making by agencies

discursive impact as political technology

Impact

Policy construction

absence of stakeholders

Tension between and within policies

Re-formulation throughout policy cycle

Policy in practice

enactment of policies

symbolic policy

Figure 10: Summary of the key discussion in the theoretical framework

7.5.2 Reflecting the theoretical framework

I reflected on the theoretical framework after using it to guide this study. Overall, it provided a useful conceptual structure to analyse the policy and present the study in an organised manner. It enabled me to capture complexities of the relationships between different aspects of policy, which may have been missed if a more straightforwardly linear and state-centric framework was used. It also encouraged me to examine the policy in its context and called attention to various influencing factors.

However, there was also a point where the findings of the study did not fit quite well with the theoretical framework; namely, regarding the concept of time. As explained in Chapter 3, the *policy cycle* was initially comprised of three contexts: the 'context of influence', the 'context of policy text production', and the 'context of practice' (Bowe et al., 1992). Ball later added two contexts: the 'context of outcomes', and the 'context of political strategy' (Ball, 1994; Lingard, 1996), from which my theoretical framework adopted the concept of outcomes, as the 'impact' of policies at macro level. Cochran-Smith et al.'s (2013) *politics of policy* also includes the aspect of outcome of policies, as *impact and implementation*. While recognising the importance of a feedback loop from the context of practice at macro level to the context of influence (Ball, 1994; Lall, 2007),

addition of outcome/impact of policies brought in the notion of time in the framework, which seems to sit uneasy with the intention of a non-linear model. In other words, by having the distinct aspect of outcome, I felt the framework's cross-sectional and bidirectional nature may have been compromised. Based on this reflection, a slight modification to the framework is suggested below.

Figure 11 depicts the adjusted model. Firstly, since the aspect of *discourse and influence* and *impact* in my theoretical framework both refer to macro level influences, I suggest merging these while articulating the feedback loop. As the use of the word 'influence' may indicate a notion of direction of action, the more general alternative term of *macro context and discourses* is suggested. Maintaining the use of *policy construction* is suggested instead of Ball's 'context of policy text production', as the latter indicates a specific time of policy construction. I believe it is important to have a broader concept of policy construction, as the finding of the study suggests that policies go through constant changes and re-formulation throughout the policy cycle. The adjusted framework becomes similar to the Ball's original *policy cycle*, with slight changes in wording to eliminate indication of specific time.
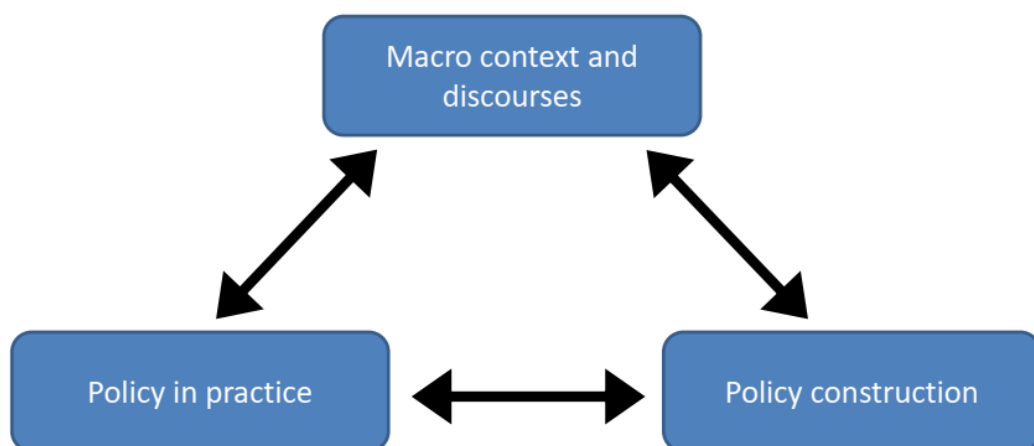

Figure 11: The adjusted theoretical framework to understand policy

The explanation of the adjusted framework follows. *Macro context and discourse* is concerned with international and national macro social, political, economic conditions, ideas and trends that shape policy discourse. *Policy construction* has to do with policy problem setting and policy text production including political agendas and struggles of actors and influencers. This aspect also includes potential re-formulation of policy and its meaning. *Policy in practice* relates to how policies are interpreted and implemented

in the actual context of practice, especially in terms of individual and collective response, acceptance and resistance, and (un)intended consequences.

The relation among the three aspects is cross-sectional and bidirectional, as expressed with the three double-headed arrows. *Macro context and discourse* shape *policy construction* or *policy in practice.* Conversely, peculiarities of *policy construction* may change or reinforce specific discourse, or outcomes of policies at sociocultural level, particularly in terms of power relations, control, dominant/marginalized discourses and groups, and (dis)empowerment of practitioners could influence the macro level context. *Policy construction,* including how policy is framed, naturally shapes *policy in practice.* Meanwhile, *policy in practice,* such as implementation status, may re-formulate the meaning of the policy. Therefore, while *policy construction* shapes *policy in practice,* the state of the latter may influence the former.

7.6   Reflecting the study in the context of globalising education policy

To conclude the discussion chapter, this section reflects the key findings of the study in relation to the existing scholarly work on globalising education policy. In doing so, it pays attention to how the 'global' impacts on the 'national' while acknowledging interdependency of actors and the movement of ideas in framing policies (Ball, 2016b). Two themes are discussed: policy borrowing and change in national policy-making space.

Policy borrowing

This study can be categorised as policy borrowing research. In particular, it concerns the adoption of the global education policy (GEP) and chose the local policy context as the primary site for understanding policy borrowing. This part summarises the findings of the study as a case of policy borrowing.

Firstly, the timing of policy borrowing is reflected. Steiner-Khamsi (2016, 2004) argues deterritorialisation occurs during the diffusion of innovation. She argues that while early adopters make explicit references to lessons learned from external education systems, once a critical mass has borrowed, the policy loses geographic and cultural origins and becomes reframed as an 'international standard' or 'best practice', which facilitate exponential growth. As introduced in Chapter 3, Lao (2015) identifies the decade of the 1990s as the exponential growth phase of EQA.

In India, the discussion on adopting an EQA system started as early as in 1986 when the UGC constituted a Committee on Accreditation and Assessment Council, which

studied existing methods of quality assessment and quality control of HE in Australia, Canada, the UK and the USA. The recommendation from the Committee resulted in the establishment of the NAAC in 1994. It was followed by several other regulatory agencies' adoption of accreditation system in 1998 (Stella, 2002). The policy of the study was formulated in 2002, which makes it a late adopter of the accreditation policy both on a global and national perspective. The study can be also understood as domestic policy borrowing. This possibly explains that the policy-makers in the study made references to other national agencies, but not to external education systems. It may suggest that the deterritorialisation process had been completed by that time, and accreditation was considered a 'good practice'.

Secondly, I reflect under which circumstances the policy borrowing happened in the study. To unpack questions on policy adoption, Steiner-Khamsi (2016) uses Kingdon's (1995) Policy Streams Approach to identify favourable conditions for policy change. She argues that the convergence of the three following streams is likely to open a policy window: the problem stream (a problem is recognised); the policy stream (a solution is available in the policy community); and the political stream (new developments in the political realm). Steiner-Khamsi (2016) argues that the policy stream tends to be available to national policy makers at all times with the globalisation of education policy. In this study, the policy problem was not clearly defined, but the concern over the quality of growing private providers was widely recognised (the problem stream). A solution, accreditation in this case, was already available to policy actors in India (the policy stream). It was the political pressure from the MHRD to address the issue of quality of TEIs that triggered the policy dialogue (the political stream). Policy Streams Approach seems a useful framework to summarise the circumstances of policy adoption of the study.

Lastly, the findings of the study suggest that the national actors led the policy formulation, which may make this study an interesting case of policy borrowing. It may be a result of late adoption, for accreditation had become a readily available policy option in Indian policy community by the time of the policy formulation. While policy borrowing in the Global South is often a transient phenomenon that only exists as long as external funding continues (Steiner-Khamsi, 2016), there was no such external actor in this study's policy formulation. On the contrary, it was the NAAC that invited an international organisation, the COL, to support some aspect of the policy-making. According to NAAC1, NAAC knew one COL official, who is an Indian national and had previously collaborated with the NAAC. Although the influence of GEP was clear in the study, it presented nuanced

relations between 'global' and 'national' and socially constructed processes of policy-making as fields of power relations and shifting ideological alignments.

Change in national policy-making space and process

The most influential feature to define the policy-making of the study may be the complexity of national policy-making space. India is regarded as a federal state, in which a delicate balance between centralisation and state autonomy is being reconfigured in the ongoing process of economic reforms since the 1990s (Sharma and Swenden, 2017). Education is no exception to be subject to the influence of the centre-state relations, and degree-level TE, the focus of the study, is under particularly complex governance, since it is under the central government entities such as the UGC and the NCTE as a part of HE while its students are mainly prepared for secondary schools, which are primarily regulated by state governments. Although this study's policy-making involved only a few national agencies, Indian TE governance is characterised with the complexities of the overlapping lines of influence including the MHRD, the NCTE, state governments, universities and colleges. The government's change of its policy from only state funding of HE to promote private HE added difficulty in the governance (Stella, 2002).

Moreover, it was found that the study's policy-making in 2002 was situated in the changing governance discourse and mechanisms in India with the introduction of neoliberal paradigm in the 1990s. To capture some of its complexity of the formal institutions and the structures in Indian TE governance relating to the study, the concept of multi-level governance (MLG) was introduced earlier in this chapter. As the definition of MLG by Hooghe and Marks (2001, p. 3) indicates, the context of the study shows 'the dispersion of authority away from central government upwards to the supranational level', such as the strong influence of global policy discourses and involvement of an international organisation, COL, in defining the indicators for TE accreditation, as well as 'downwards to subnational jurisdictions, and sideways to public/private net-works' including the policy-making by agencies without consulting the central government. In other words, not only is the state losing its centrality in the policy-making process due to globalising education policy as discussed in the literature review (Rizvi and Lingard, 2009; Robertson, 2018), it is also delegating authorities in multiple ways within the country. Many themes discussed in this chapter such as agencification, weak policy mediation and policy coherence seem to stem from this complex policy-making space.

This study suggests that such changes in the policy-making space influence processes of policy-making, such as who makes policies and who is given a voice. This chapter

highlights that policy-making by agencies may result in prioritising effectiveness and efficiency at the expense of legitimacy and participation (Lundqvist, 2004; Söderberg, 2016). Bache et al. (2016) suggest that the implications of MLG include that distinct decision-making levels are becoming more difficult to discern and a new decision-making context makes it necessary to rethink democratic accountability. Robertson (2012) argues that limited space for practitioners to participate in education policy-making may be argued as a consequence of globalising policy, which may have serious social justice implications for national citizens who have limited means for political contestation. Although they are discussing different topics, the implication is similar, that is the shifting decision-making in policy-making i.e. authoritative allocation of values for society, may indicate that the principles of representative democracy may be threatened.

Chapter 8 - Conclusion

8.1 Introduction

This research is a qualitative case study examining the construction of a policy that began the accreditation of teacher education (TE) programmes in India. It critically analysed how a national education policy was discursively constructed in a globalising policy-making space.

This concluding chapter summarises the main findings (8.2), outlines the implications of the findings for stakeholders (8.3), offers recommendations for future research (8.4), and lists contribution to knowledge (8.5). It then concludes with personal reflections on the research journey to note how this study informs my practice as a practitioner and novice researcher (8.6).

8.2 Summary of findings

The research question of this study is 'How is the policy of accreditation of teacher education programmes in India discursively constructed?'. There are two sub questions (SQ) examining policy formulation (SQ1) and policy content (SQ2). This section first summarises the findings for each SQ, followed by the overarching finding.

Summary of findings for SQ1

Chapter 5 examined SQ1: What was the agenda setting and policy text production processes of the policy of the accreditation of teacher education programmes in India? The findings suggest that the negotiation between the NCTE and the NAAC to agree on the collaboration and produce the policy text was contest-free focusing on operational and administrative issues. The analysis found that there was an increasing demand to improve access to basic education, which required more TEIs to prepare teachers, which was leading to mushrooming private providers and concerns over their quality. However, in the policy formulation process, little effort was made to specify the policy problem or explore policy options. Rather, the analysis indicates that accreditation was an obvious choice for stakeholders as a response to the concern over the quality of TEIs. The chapter found that important decisions and meaning-making in this policy-making were often done outside of formal policy formulation space, silently shaped by policy discourses and context of the time that made some choices appear "natural". The finding also indicates that the meaning of the policy was not static, but altered over time in relation to the changing context.

Summary of findings for SQ 2

Chapter 6 answered at SQ2: What are the discourses embedded in the policy of accreditation of teacher education programmes in India? This chapter examined the three policy documents. The literature claims the similarity of the accreditation procedures in many countries, and the analysis confirmed that the NCTE-NAAC accreditation procedures also follow the global norm. However, further examination also identified deviations such as discrepancies between the stated intent and operation materials, and between the documents of the NCTE and the NAAC, which seem to have been shaped by the diverse, dynamic and specific context of policy actors. Such different interpretations and weak consistencies may be caused by the lack of explicit statements of vision and theory that underpin the system of the NCTE-NAAC accreditation. The absence of in-depth discussions in the policy formulation stage, as found in SQ1, may have allowed the different and unclear views co-exist in the accreditation mechanisms.

Overarching findings

Chapter 7 synthesised and discussed the key findings from the two finding chapters. It found that international and national macro ideas and trends such as international and national popularity of accreditation and the neoliberal governance reform including multi-level governance (MLG), weakened central government control to mediate policy, and the proliferation of agencies influenced the policy-making. The analysis of the policy construction highlighted the technical nature of policy-making by agencies with a narrow focus without wider consultation of stakeholders or examination of relations with other policies. The chapter also examined implications, which suggests that the adoption of the accreditation policy in Indian TE as a neoliberal policy instrument possibly had a discursive impact on the construction of meaning in the local policy space in relation to TE governance. Overall, this case may be explained as the adoption of global education policy (GEP) led by national actors as domestic policy borrowing, which was characterised with internalisation of policy discourses and deterritorialisation of ideas. The observed changes in national policy-making space indicate the shifting decision-making in policy formulation and potential weakening of the principles of representative democracy.

8.3   Implication of research for practitioners

This section discusses the implication of research for practitioners. It starts for policymakers including the MHRD, the UGC, the NCTE and the NAAC (8.3.1), followed

by international development practitioners (8.3.2). This is particularly relevant for my course of Doctor of Education, as it aims to link theory and practice.

8.3.1 Policymakers

National policy-making space and the principles of democracy

The study suggests that related factors such as MLG that disperse authority away from central government upwards, downwards and sideways, weakening central government control to mediate policy, proliferation of agencies, and limited space for practitioners may influence democratic accountability in policy formulation. It seems important to re-examine the national policy-making space in the era of globalisation and its impact on the principles of democracy.

Examination of policy coherence in policy-making

The study indicates that when a new policy is introduced, the significance of related policies may be altered. It also suggests that some policies may outlive their suitability to the changing context. Therefore, the study supports Nilsson et al.'s (2012) claim that addressing the integration of the policy-making process at an early stage is important for improving policy coherence. In other words, when a new policy is introduced, the existing related policies and their implementation status should be examined in order to ensure consistencies and efficiencies of the system as a whole. As adjusting existing systems is often more difficult than adding a new policy, the government should make a conscious effort to encourage and reward the rationalisation of policies.

Unpacking policy adoption

The influence of globalisation on national education policy-making is an unavoidable reality. The study suggests that the policies with global popularity may lose geographic and cultural origins and become reframed as a "best practice" and thus perceived as a "natural" choice, especially when the policy has the appearance of "science", so it may prevent appropriate investigation of political meaning. The study suggests critical importance of unpacking policy when adopting and examining the process of adoption. In doing so, it is also important to ensure that the policy-making space engages domestic actors, who can help contextualise the policy.

Evaluating the quality of external quality assurance agency

The study raised questions regarding the assessment criteria of the NCTE-NAAC accreditation in terms of its unclear vision of TE and the state-defined quality rather than

consulting stakeholders to seek a broadly owned definition of quality. Given the importance attached to EQA agencies, the question about how to guarantee the quality of EQA agencies is important (Zhang and Patil, 2017). It seems necessary to periodically evaluate the work of EQA agencies and examine whether they are yielding the intended results.

8.3.2 International development practitioners

Steiner-Khamsi (2016) argues that the research area of policy borrowing has bifurcated into two directions: into a normative direction and into an analytical direction. Development practitioners including myself often act as "brokers" of policies and initiatives which originated in the Global North. In the process, we tend to use the former group of research that uses a normative approach and identifies "best practices" that can be learned and transferred. However, the finding of this study suggests the need to be careful about the uncritical transfer of "best practices", even when they are presented in the discourse of science and neutrality. Development practitioners should think more critically about the meaning of a policy including its symbolic functions and reflect the role we play in policy diffusion. For this purpose, we can use more of the latter type of research, that analyses policy borrowing and examine its impact on existing policies and power constellations (Steiner-Khamsi, 2016).

8.4   Implications for future research

This study offers three suggestions for future research.

Studying policy-making space in India

The complexities of TE governance and the changes in the policy-making space in India was one of the most influential factors that shaped the policy-making space in this study. This also framed the policy-making processes, which could have important implications for citizens. However, the literature review finds that research on the consequences of the governance shift such as agencification for the policy process at large is still scarce (Bach, 2012). In this vein, I support Cochran-Smith and colleagues' (2016) claim that we need more studies that deal with the complexities of overlapping lines of influence, not only in India but also in other countries, given that teacher preparation programmes are governed by many policies including national policies, state policies, national accreditors and university policies.

Comparative studies on policy borrowing of accreditation policy

This study provided one particular and thorough account of the adoption of accreditation policy in India and examined global and local influential factors. Despite a global convergence of the accreditation policy, a similar study was not found in the literature search. As this study aimed to provide sufficient description to facilitate transferability - the reader's judgement as to whether this particular case can be generalised to another context, it is recommended that more studies regarding policy borrowing of accreditation policy in other countries, particularly in the Global South, be conducted.

Studying symbolic properties of policy in policy borrowing research

In the context of globalising education policy, it is crucial to have an understanding of policy borrowing from various perspectives, but not much empirical research has been conducted to study its re-contextualisation (Rizvi and Lingard, 2009; Verger et al., 2018). This study indicates the critical importance of this knowledge, especially in cases of policy transfer to the context that is significantly different from the context of policy origin. This study also highlights the importance of investigating the social and symbolic value of policy in addition to tangible value of policy, especially when it is not overtly discussed. It is recommended to pay more attention to symbolic properties of policy in policy borrowing research.

8.5 Contribution to knowledge

The key contribution of the study may be summarised in the following three points. Firstly, this is one of the few qualitative studies conducted for the policy of accreditation of TE in India. The literature review finds few such studies and none on the construction of the policy of the NCTE-NAAC accreditation.

Secondly, the study contributes to the policy borrowing research (Steiner-Khamsi, 2016). In particular, it contributes to an understanding of when, why and how policy borrowing of EQA policy, one of the GEPs, occurs. While many studies on EQA focus on its global policy convergence or implementation, the study helps deepen understanding of the adoption of this popular policy including influencing factors, processes and its implications. For instance, it gives insight about a nuanced understanding of how the 'global' influences the 'national', the GEP's deterritorialisation and internalisation process, and re-contextualisation of policy to fit to local reality.

Thirdly, the study contributes to understand shifting national education policy-making space and how it may influence the construction of policy. The study found that the global discourse, especially of neoliberal governance such as MLG and agencification,

influenced the national policy-making space, policy construction and contents, which may have important implications for democracy. This calls for more research on national policy-making space.

8.6   Conclusion: reflections on the research journey

This research journey began in 2012, but my interest in accreditation in TE dates back in 2008 when I started managing the UNESCO project to support the establishment of an accreditation agency for TE in Pakistan. Although the project was evaluated as successful, I was concerned about whether the accreditation system would actually contribute to improving the quality of education as it claimed. In the course of the study, I started to question why the policy is adopted in so many countries, leading to this study to examine policy adoption.

Undertaking this research re-shaped my professional practice. I have gained a greater insight into the dynamics of GEP adoption and influencing discourses. Moreover, finding how the specific discourse frames problems and solutions in a particular way, making some options look "natural" in the context, was an eye-opening experience. It taught me to question my assumptions and underlining ideology behind my own and my colleague development workers and organisations. It taught me to ask whether we are not conveniently focusing on de-politicised discourses to help do our work, and if there is an undiscussed, symbolic role of a new policy behind "international good practice".

My initial motivation to pursue this course was to gain technical knowledge to do my work better. However, what I appreciate most at the end of this journey is gaining a researcher's mind to critically question and to reflect on my professional decisions. It may not necessarily make my work easier, but hopefully, it will make me a better worker.

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Appendix 1: Summary of teacher education courses and qualification of teachers

This annex reviews the various teacher education programmes and qualification of teachers as important background information for the study. The case study policy, the NCTE-NAAC accreditation was applicable to all the degree-level programmes, but not to diplomas programmes. Thus, it targeted only a part of TE programmes.

1. Various teacher education courses

The NCTE sets the norms and standards for various teacher education programmes in its Regulation. The norms and standards define minimum requirements for TE programmes of each level such as entry requirement, number of seats, duration, working days, staff requirement and necessary facilities. These norms and standards have been amended over the years.

There is a Regulation in 2002, F.9-18/2002/NCTE dated 13.11.2002 published in the Gazette of India Extraordinary, Part – III – Section 4 as No. 248 on 18.11.2002, containing the norms and standards of various teacher education programmes. This is the closest to the time of the case policy introduction in 2002, but unfortunately, the document was not found in the literature search. As a substitute, the table below shows the list of recognised courses as per *the NCTE Annual Report 2002-2003* (NCTE, 2003b). The number of recognised courses as of 31 March 2002 is also included as additional information. The table indicates *elementary*, the minimum requirement for primary teachers has the highest number (1,049), followed by the B.Ed. (911). The case study policy, the NCTE-NAAC accreditation applies only to degree-level programmes, such as B.El.Ed., B.Ed., M.Ed., B.P.Ed. and M.P.Ed., among which B.Ed. is outstanding in number.

Table 1 Number of Teacher Education Courses Recognised as of 31 March 2002

	Courses	Number
1	Pre-primary	65
2	Elementary	1,049
3	Bachelor of Elementary Education (B.El.Ed.)	6
4	Bachelor of Education (B.Ed.) Face to Face	911
5	Bachelor of Education (B.Ed.) Distance Education	12
6	Master of Education (M.Ed.) Face to Face	138
7	Master of Education (M.Ed.) Distance Education	4
8	Certificate in Physical Education Programme (C.P.Ed.)	73
9	Bachelor of Physical Education Programme (B.P.Ed.)	175

10	Master of Physical Education Programme (M.E.Ed.)	46
11	Others	133
	TOTAL	2,612

Source: (NCTE, 2003b)

The next norms and standards for teacher education programmes is *the NCTE (Recognition Norms and Procedure) Regulation 2005*. The table below lists the pre-service TE programmes the NCTE lists in the Regulation 2005. For each programme, the norms and standards are annexed in the Regulation. Compared with the list of 2002 in table 1, there are two more programmes, nursery TE programme and M.Ed. (part time).

Table 2 List of Teacher Education Programmes in 2005 Regulation

	Courses	Duration	Admission Qualification
1	Pre-school Teacher Education Programme	1 year	Secondary
2	Nursery Teacher Education Programme	2 years	Senior secondary
3	Elementary Teacher Education Programme	2 years	Senior secondary
4	Bachelor of Elementary Education (B.El.Ed)	4 years	Senior secondary
5	Secondary Teacher Education Programme (B.Ed.)	1 year	Graduate
6	Master of Education Programme	1 year	Bachelor
7	Master of Education Programme (part time)	2 years	B.Ed.
8	Certificate in Physical Education Programme (C.P.Ed.)	2 years	Senior secondary
9	Bachelor of Physical Education Programme (B.P.Ed.)	1 year	Bachelor
10	Master of Physical Education Programme (M.E.Ed.)	2 years	B.P.Ed.
11	B.Ed (Open and Distance Learning System)	24 months	Bachelor + 2 y experience
12	M.Ed (Open and Distance Learning System)	24 months	B.Ed.

Source: The Gazette of India [Extraordinary], Part-iii, Section 4 on 13 January, 2006

NCTE F.No.49-42/2005/NCTE, 27 December, 2005

The programmes and norms and standards have been revised several times since then. The table below summarises the listed programmes. Notable changes include an upgrade of pre-primary teacher requirement, increasing integrated 4-year programmes, and extension of B.Ed. programme from one to two years. The National Education Policy 2020 aims to convert minimum qualification for teachers to 4-year integrated B.Ed. degrees by 2030, which will likely to bring significant changes to the programmes listed by the NCTE.

Table 3 Changes in the list of programmes after 2001

Year	Changes	Source
2007	-Nursery Teacher Education Programme unlisted -Four-years Bachelor of Physical Education programme added -D.Ed. (Open and Distance Learning System) added	NCTE Notification, F.No.51-1/2007/NCTE(N&S), 27 November 2007
2009	-Pre-school education (certificate) was changed to Diploma in Early Childhood Education	NCTE Notification,

	-Master of Education Programme (part time) unlisted -Diploma in arts education added	F.No.51-1/2009/NCTE(N&S), 31 August 2009
2014	-Master of Education Programme (Open and Distance Learning) unlisted -Duration of B.Ed. extended from one to two years -Bachelor of Education (Part Time) added -4-year integrated programme B.A.B.Ed./B.Sc.B.Ed. added -B.Ed. and M.Ed. (3 years integrated) added	NCTE Notification, No.F.51-1/2014-NCTE (N&S), 28 November, 2014
2018	-4 years integrated TE programme (pre-primary to primary) added -4 years integrated TE programme (upper primary to secondary) added	NCTE Notification, F.No.NCTE-Reg1011/80/2018-MS 20 November, 2018
2019	Norms and regulation for 4 years integrated TE programmes amended	NCTE Notification, F.No.NCTE-Reg.1011/80/2018-MS 29 March, 2019

Next, reference to the NCTE-NAAC accreditation in the Regulation is analysed. For 2002 Regulation, the document is not found. The collaboration between the NCTE and the NAAC was terminated in 2017, and the table does not include the 2018 and 2019 Regulation.

Table 4 Excerpts regarding the NAAC accreditation

Year	References to NAAC accreditation
2002	(document not available)
2005	8. Conditions for grant of recognition '(4) An institution shall be permitted to apply for enhancement of intake in Secondary Teacher Education Programme – B.Ed. & B.P.Ed. Programme, if it has accredited itself with the National Assessment and Accreditation Council (NAAC) with a grade of B+ on a nine point scale developed by NAAC.'
2007	8. Conditions for grant of recognition '(4) An institution shall be permitted to apply for enhancement of intake in Secondary Teacher Education Programme – B.Ed. & B.P.Ed. Programme, if it has accredited itself with the National Assessment and Accreditation Council (NAAC) with a *Letter Grade* of B developed by NAAC. (5) An institution that has been granted additional intake in B.Ed. and B.P.Ed teacher training courses after promulgation of the Regulations, 2005 i.e. 13.1.2006 shall have to be accredited itself with the National Assessment and Accreditation Council (NAAC) with a Letter Grade B under the new grading system developed by NAAC before 1st April, 2010 failing which the additional intake granted shall stand withdrawn w.e.f. the academic session 2010-2011'
2009	8. Conditions for grant of recognition '(4) An institution shall be permitted to apply for new course of Master of Education and Master of Physical Education and enhancement of intake in – Bachelor of Education, Bachelor of Physical Education, Master of Education and Master of Physical Education Programme, after it has been accredited by the National Assessment and Accreditation Council (NAAC) with at least a letter Grade B developed by NAAC. (5) An institution that has been granted additional intake in Bachelor of Education and Bachelor of Physical Education teacher training courses after promulgation of the Regulations, 2005 i.e. the 13th day of January 2006 shall have to get itself accredited by National Assessment and Accreditation Council (NAAC), with a Letter Grade B under the new grading system developed by NAAC, on or before the 1st day of April, 2010 failing which the additional intake granted shall stand withdrawn with effect from the academic session 2010-2011. Similarly, all institutions having a Master of

	Education and Master of Physical Education courses shall have to get NAAC Accreditation with at least a Letter Grade B on or before the 1st day of April, 2012, failing which Master of Education or Master of Physical Education recognition granted to the institutions shall stand withdrawn with effect from the academic session 2012-2013.'
2014	Appendix-5 **Norms and Standards for master of education programme leading to Master of Education (M.Ed.) Degree** 2. Institutions Eligible to Apply '(i) Institutions offering teacher education programmes for a minimum period of five academic years, being affiliated to a university, and having applied for accreditation from NAAC or any other accrediting agency approved by NCTE.' 4.1. Intake, Eligibility, Admission Procedure and Fees Intake 'The basic unit size for the programme shall be 50. An Institution shall be allowed only one unit. Additional unit in the programme shall be permitted only based on quality of infrastructure, faculty and other resources, after the Institution has offered the programme for three years and has been awarded minimum B+ grade by NAAC or any other accrediting agency approved by NCTE.' Appendix-14 **Norms and Standards for B.Ed. (part-time) programme leading to Bachelor of Education (B.Ed.) Degree** 2. Institutions Eligible for Offering the Programme '(i) NCTE recognised Teacher Education Institutions offering B.Ed. and M.Ed. programmes which have been in existence for at least five years and having NAAC Accreditation with minimum B grade.' Appendix-15 **Norms and Standards for three-year integrated B.Ed.-M.Ed. Degree Programme, 2014** 2. Institutions Eligible to Apply '(i) NCTE recognised Teacher Education Institutions offering B.Ed. and M.Ed. programmes which have been in existence for at least five years and having NAAC Accreditation with minimum B grade.' **4.1 Intake** 'The basic unit size for the programme shall be 50. An Institution shall be allowed only one unit. Additional unit in the programme shall be permitted based on quality of infrastructure, faculty and other resources, after the Institution has offered the programme for five years and has been awarded minimum B+ grade by NAAC or by any other accreditation agency approved by NCTE.'

The table below summarises the requirements. Over the four Regulations, the targets was expanded from Bachelor levels (2005, 2007) to both Bachelor and Master levels (2009, 2014) as well as from additional intake to both opening new course and additional intake.

Table 5 Summary of the NAAC accreditation required in NCTE Regulation

Year	Target programmes	For	Requirement	Retrospective action
2005	B.Ed. & B.P.Ed.	Additional intake	Grade B+	No
2007	B.Ed. & B.P.Ed.	Additional intake	Grade B	Required
2009	M.Ed. & M.P.Ed.	New course	Grade B	Required
	B.Ed. & B.P.Ed. & M.Ed. & M.P.Ed.	Additional intake	Grade B	Required

2014	M.Ed.	New course	Application	No
		Additional intake	Grade B+	No
	B.Ed. (part-time)	New course	Grade B	No
	3-year Integrated B.Ed. and M.Ed.	New course	Grade B	No
		Additional intake	Grade B+	No

Another important point is the involvement of the State Government and Affiliating Body, mostly universities, in the NCTE recognition. The table below summarises the role of state government and affiliating body mentioned in the Regulation for the NCTE's recognition of the courses. While the submission of NOC from the State Government was the requirement since 1995 (NCTE, 2003a). The requirement of NOC came under criticism and was challenged in various court. The matter was resolved in 2003 by the Supreme Court that upheld the requirement of NOC. From 2007, the communication was done directly between the NCTE and the concerned State Government and UT. 2007 Regulation seems to be weakest in terms of ensuring the consent of the State Government.

Table 6 Role of State Government and Affiliating Body in NCTE Recognition

Year	Summary
1995	All the applicants have to submit Non-objection certificate (NOC) issued by the State Government in the application document
2005	All the applicants have to submit Non-objection certificate (NOC) issued by the State Government in the application document
2007	After receiving the application from an institution, the NCTE will communicate with the concerned State Government/UT Administration seeking its recommendation within 60 days. If no communication is received, it is presumed that no recommendation to make.
2009	Within 30 days of the receipt of the application from an institution, the NCTE will communicate with the concerned State Government/UT Administration seeking its recommendation within 45 days. If no communication is received, the NCTE will send a reminder seeking response within 30 days. On expiry of this period, the NCTE will make a decision. Decision will be communicated to the concerned State Government/UT Administration and the affiliating body.
2014	Similar to 2009. Changes are: -The NCTE will communicate with the affiliating body as well as the concerned State Government/UT Administration; -A second reminder will be sent giving another 15 days.

2. Minimum qualification of teachers

The NCTE sets minimum qualification of teachers in its Regulation. The requirements are summarised in this section. The tables below show the qualification set in the NCTE (Determination of minimum qualifications for recruitment of teachers in schools) Regulations, 2001.

Table 7 Minimum qualification of teachers set in 2001

Level	Minimum Academic and Professional Qualifications
I Elementary Primary (G1-5) Upper Primary (Middle school section) (G6-8)	Senior Secondary School certificate or Intermediate or its equivalent; and Diploma or certificate in basic teachers' training of a duration of not less than two years. **OR** Bachelor of Elementary Education (B.El.Ed.) Senior Secondary School certificate or Intermediate or its equivalent; and Diploma or certificate in elementary teachers training of a duration of not less than two years. **OR** Bachelor of Elementary Education (B.El.Ed.) **OR** Graduate with Bachelor of Education (B.Ed.) or its equivalent.
II Secondary/High School (G9-10)	Graduate with Bachelor of Education (B.Ed.) or its equivalent. **OR** Four years' integrated B.Sc., B.Ed. or an equivalent course.
III Senior Secondary/ PUC/ Intermediate (G11-12)	Master's Degree in the relevant subject with Bachelor of Education (B.Ed.) or its equivalent. **OR** Two years' integrated M.Sc.Ed. course or an equivalent course.

Table 8 Minimum qualification of physical education teachers set in 2001

Level	Minimum Academic and Professional Qualifications
I Elementary	(i) Senior Secondary School certificate or Intermediate or its equivalent; and (ii) Certificate in Physical Education (C.P.Ed.) of a duration of not less than two years or its equivalent.
II Secondary/High School	Graduate with Bachelor of Physical Education (B.P.Ed.) or its equivalent.
III Senior Secondary/PUC/Intermediate	M.P.E./M.P.Ed. (2 year duration)

Source: The Gazette of India, Notification No. 238 of September, 4, 2001
NCTE F.No.9-2/2001/NCTE, 3 September, 2001

Main changes after 2001 are summarized below, though they are not exhaustive.

Table 9 Main changes in minimum requirement after 2001

Year	Changes	Source
2003	Requirements for pre-primary/ nursery teacher was added	NCTE Notification, F.No.9-2/2001/NCTE, 28 April 2003
2010	Changes for G1-8 teachers only. -Minimum qualification for grade G1-5 and G6-8 teachers are separated; -For G1-5 teacher, option of B.Ed. was removed; -G6-8 teacher minimum requirement was upgraded to degree level, making B.Ed the main option;	NCTE Notification, F.No.61-03/20/2010/NCTE(N&S), 23 August, 2010

	-Minimum requirement of marks was added; -Pass of Teacher Eligibility Test (TET) was added.	
2011	Changes for G1-8 teachers only. -For G1-5 teachers, graduation and two years of Diploma in Elementary Education was added as another option. -"B.A/B.Sc" was replaced with less specific "graduation"	NCTE Notification, F.No.61-1/2011/NCTE(N&S), 29 July 2011
2014	Minimum requirement of marks was added for pre-primary and grade 9-12 teachers.	NCTE Notification, F.No.62-1/2012/NCTE(N&S), 12 November 2014
2018	For primary teachers, graduation and B.Ed was added as an option	NCTE Notification, F.No.NCTE-Regl 012/16/2018, 28 June 2018

Over the years, the minimum requirements of teachers have become higher more specified. As discussed in the context chapter, the National Education Policy 2020 aims to raise the minimum qualification for teachers to 4-year integrated B.Ed degrees by 2030 (Government of India, 2020).

The case study policy, the NCTE-NAAC accreditation applies only to degree-level programmes, such as B.El.Ed., B.Ed., M.Ed., B.P.Ed. and M.P.Ed., among which B.Ed. is outstanding in number as in Table 1. According to the Regulation 2001, B.Ed. was the option for teachers for primary to secondary (G1-10) levels. Then in 2010, the minimum qualification of upper primary (G6-8) teachers became the degree-level, making "graduate plus B.Ed." the main route. Table 1 indicates that the Elementary and B.Ed. courses were two largest in the number of recognised courses. This trend continued for a decade though B.Ed. slightly exceeded in numbers in many years (Table 10).

Table 10 Number of Teacher Education Courses Recognised

	Elementary	Bachelor of Education (B.Ed.)
31 March 2002	1,049	911
31 March 2003	1,136	1,119
31 March 2004	1,219	1,492
31 March 2005	N/A	N/A
31 March 2006	3,231	3,269
31 March 2007	4,136	4,034
31 March 2008	5,128	5,030
31 March 2009	6,104	6,183
31 March 2010	6,165	6,363
31 March 2011	6,061	6,358
31 March 2012	6,034	6,423

Source: (NCTE, 2012, 2011b, 2010, 2009c, 2008, 2007, 2003b)

Appendix 2: Interview topic guide

Study Title

Teacher Education Quality Assurance Policy Making in India: construction of accreditation of teacher education institutions

Data Collection Methods

Documentary analysis and interview will be employed for the study. Interview will be used as the primary means of gathering information on the research interest. It may also be used to validate information I gain from documentary review. Semi-structured interview will be used to generate information on research topics across participants within limited time, while some flexibility is built in to capture unexpected issues and information. When participants' consent is obtained, the interview will be recorded.

Interview Topic Guide

1) Introduction

-Introduce researcher

-Explain objective of the research

-Explain points in 'Participants Information Sheet' and ask them to take time to read

-Signing consent form

-Ask permission for recording the interview

2) Profile of the Participants

-Ask relevant profile of the participants (job title, responsibilities, etc)

3) Research Questions for SQ 2

Note: From this point, ask relevant questions according to the nature of involvement in policy making.

-What policy text exist regarding accreditation of teacher education institutions?

"Apart from MOU between NAAC and NCTE signed in 2002, and revision of regulation of NCTE, is there any policy text in relation to accreditation of TEIs?"

-Questions regarding the contents of policy texts

According to the policy text analysis, ask relevant questions such as:

"Why the MoU this short?"

4) Research Questions for SQ 1

-What was the process of producing the policy text?

"Could you please describe how you became involved? Someone asked you?"

"Could you please describe the process? Were there meetings?

"Who or which organisations were involved in the process? Why? Why not involved others?"

"Were there reports or study prepared during the process?"

-Where did the policy agenda originate?

"Do you know who or which organisation initiated the idea?"

"When did you learn first about the plan to start accreditation of TEIs?"

-What were the national educational/social/political contexts that have constructed the policy agenda?

"Why did you need accreditation? Was there any problem accreditation was supposed to address?"

"What was the expected effect?"

-What were the competing interests among 'players (groups, interests, individuals)', and negotiation among them?

"What was your opinion regarding the introduction of accreditation?"

"Were there different opinions among people involved in the process?"

"How did you negotiate?"

"What were the concerns?"

-What were the responses of B.Ed colleges?

"Did you know the initial response by B.Ed colleges?"

-How have empirical research and policy precedents been used in constructing the policy?

"Were there any study and report used during the process? For example any reports from India or report of other countries' examples of accreditation of TEIs?"

-How did the policy's complementarity and coherence with existing policies and mechanisms considered in the process?

"Are there other policies or mechanisms that are closely related to the accreditation policy?"

"How does it relate to universities' role in quality assurance?"

"How does it relate to NCTE' monitoring role?"

5) Post Interview

-Ask the participant if she/he would like to raise/tell anything that was not covered in the interview

-Tell the participant she/he can contact me at any time if she/he has any question about the interview or research, or with to retract any part of the interview
-Thanking the participant

Appendix 3: Sample of coding

As explained in Section 4.5.3, the interview transcript analysis process is broadly divided into six steps, two of which involve coding. Below are the screenshots from these two steps provided as samples.

Third step: Initial coding using NVivo (sample)
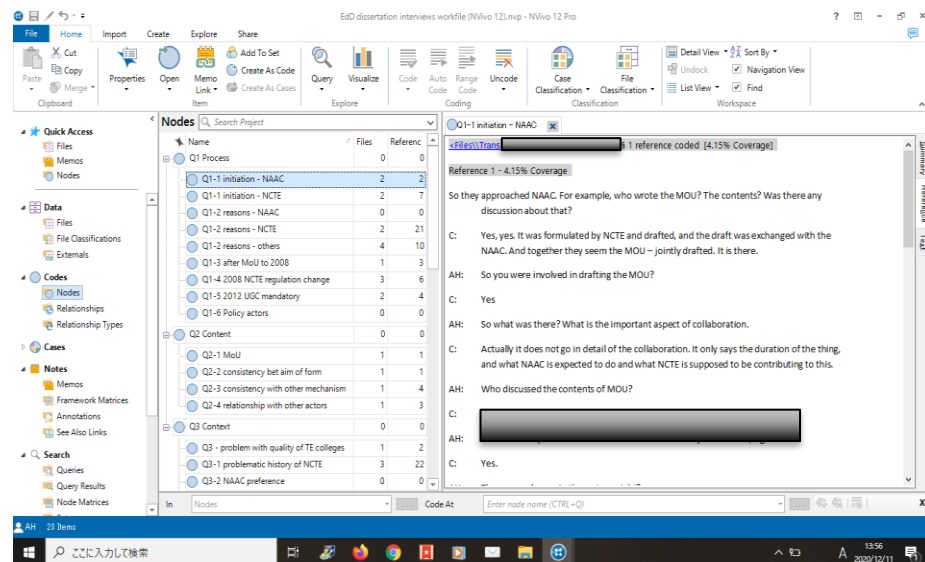
Sixth step: final sorting of emerging themes (sample)

Appendix 4: Participant information sheet

US
University of Sussex

PARTICIPANT INFORMATION SHEET
(For Interview Participants)

Study title

Teacher Education Quality Assurance Policy Making in India: construction of accreditation of teacher education institutions

Invitation paragraph

You are being invited to take part in a research study. Before you decide whether or not to take part, it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully.

What is the purpose of the study?

This research aims to gain insight into teacher education quality assurance policymaking process and its context from which policy emerges, by studying the policy of accreditation of teacher education institutions in India. It seeks to understand the complex policymaking process, with particular attention to identify key influencing factors.

My fieldwork in India is expected to last six weeks in Oct-Nov in 2014, and four weeks in Feb 2015. Then thesis will be written up in subsequent period in 2015 and 2016.

Why have I been invited to participate?

You are invited to participate in my study as you took part in the formulation of policy of accreditation of teacher education institutions. Identifying people who were involved in the policymaking process is a part of my fieldwork, but I anticipate to interview some 20 people.

Do I have to take part?

It is up to you to decide whether or not to take part. If you do decide to take part you will be given this information sheet to keep and be asked to sign a consent form. If you decide to take part you are still free to withdraw at any time and without giving a reason.

What will happen to me if I take part?

If you agree to take part, the researcher will interview you on your experiences and views regarding the policy of accreditation of teacher education institutions. The interview is likely to take 30 to 60 minutes.

What are the possible disadvantages and benefits of taking part?

There are no disadvantages of taking part in the research, apart from the time required for the interview. It may give participants a chance to reflect on the policy.

Will my information in this study be kept confidential?

All information collected about you will be kept strictly confidential. The information that can identify you will not be used. The transcribed data will be securely stored using a code, with your identity kept separately and only the researcher will have access to the data. Your real name and your institution and location will NOT be used in the report.

What should I do if I want to take part?

If you agree to take part in the study, please read the consent form and sign. You will then be interviewed at mutually agreed time at your office.

What will happen to the results of the research study?

The conduct of the study is for my degree thesis for Doctor of Education (EdD), University of Sussex in UK. The results of this research study will be used in this thesis, which will be submitted to the university. In case the report is to be published, I will share the copy of publication.

Who is organising and funding the research?

I am conducting the research as a student of International Doctor of Education programme, School of Education and Social Work, University of Sussex in UK

Who has approved this study?

The   research has been approved by the Social Sciences & Arts Cross-Schools Research Ethics Committee (C-REC) at University of Sussex.

Contact for Further Information

For further information, please contact the researcher any time.

Name: Akiko HANAYA

Title: Third year student, International Doctor of Education,

School of Education and Social Work, University of Sussex, UK

Email: A.Hanaya@sussex.ac.uk

If you have any concerns about the way in which the study has been conducted, please contact my supervisor.

          Name: Dr Yusuf Sayed

          Title: Reader in International Education (Education)

University of Sussex, UK

Email: Y.Sayed@sussex.ac.uk

Thank you very much for taking time to read the information sheet.

XX Oct 2014

Appendix 5: Consent form for project participants

US

University of Sussex

CONSENT FORM FOR PROJECT PARTICIPANTS

PROJECT TITLE: Teacher Education Quality Assurance Policy Making in India:

construction of accreditation of teacher education institutions

Project Approval Reference:

I agree to take part in the above University of Sussex research project. I have had the project explained to me and I have read and understood the Information Sheet, which I may keep for records. I understand that agreeing to take part means that I am willing to:

- Be interviewed by the researcher
- Allow the interview to be audio taped
- Make myself available for a further interview should that be required

I understand that any information I provide is confidential, and that no information that I disclose will lead to the identification of any individual in the reports on the project, either by the researcher or by any other party.

I understand that I will be given a transcript of data concerning me for my approval before being included in the write up of the research.

I understand that I have given my approval for the name of my workplace (NAAC/NCTE) to be used in the final report of the project, and in further publications. (This clause only for NAAC/NCTE)

I understand that my participation is voluntary, that I can choose not to participate in part or all of the project, and that I can withdraw at any stage of the project without being penalised or disadvantaged in any way.

I consent to the processing of my personal information for the purposes of this research study.   I understand that such information will be treated as strictly confidential and handled in accordance with the Data Protection Act 1998.

Name:

Signature

Date: