

**Practice submissions – are doctoral regulations and policies  
responding to the needs of creative practice?**

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## **Practice submissions – are doctoral regulations and policies responding to the needs of creative practice?**

Practice-based research is now widely accepted at doctoral level, and it is recognised that creative practice can be the mode, method, tool, object, subject and/or embodiment of research in the arts and humanities PhD (Taylor, 2018; Vaughan 2020). The growth of creative methods and arts-based methods also means that data is increasingly gathered through creative means in many social science and education doctorates (Kara 2015, Leavy 2018). The doctoral contribution as thesis can therefore no longer be automatically assumed to be contained solely in a written text. This paper questions the extent to which research degree regulations and policies are reflecting and enabling the diversity of contemporary forms of knowledge articulation in practice-based research. Arising from my lived experience of supporting doctoral candidates to navigate regulations on the format and formatting of a submission, it draws on empirical research into research degree regulations at a number of universities in the United Kingdom, contextualised in relation to the literature. I reveal the assumptions and constraints embedded in regulatory practices and highlight ongoing concerns around the articulation and archiving of practice-based doctoral research.

Keywords: PhD; regulations; creative practice; practice-based research; doctorates

### **Introduction**

Practice-based research is now widely accepted at doctoral level. It is recognised that creative practice can be the mode, method, tool, object, subject and/or embodiment of research in the arts and humanities PhD (Taylor, 2018; Vaughan 2020). The growth of creative and arts-based methods in the social sciences and education also means that data is increasingly gathered through creative means in many professional doctorates (Kara 2015, Leavy 2018). Whereas traditionally, the PhD submission was assumed to be a written thesis of between 80,000 and 100,000 words (Hoddell, Street, and Wildblood, 2002), the doctoral contribution as thesis can no longer be automatically

assumed to be contained solely in a written text. The doctoral thesis can be appropriately articulated and submitted for examination in diverse formats, including exhibitions, performances, recordings, artefacts and artworks, as well as written text (Christianson et al 2015).

Notable examples are to be found across numerous disciplines as well as within art, design, music and performance. Nick Sousanis used a comic book format for his Doctorate in Education dissertation *Unflattening: A Visual-Verbal Inquiry into Learning in Many Dimensions* at Columbia University in 2014, subsequently published to critical acclaim (2015). A.D. Carson submitted his PhD thesis in Rhetorics, Communication and Information Design at Clemson University in South Carolina on Hip Hop music as a digital archive featuring a 34-track rap album *Owning My Masters: The Rhetorics of Rhymes & Revolutions* (2017). At the University of Iowa, Anna Williams' dissertation for her 2019 English PhD was *My Gothic Dissertation: a podcast*, which mixed voice, music and sound to dramatise scenes from novels and incorporate analysis through her narration. Interestingly though, in the online institutional repository it is described as 127 pages with accompanying dissertation audio clips, suggesting that the infrastructure defaulted to, and to an extent privileged, a traditional text-based model.

### **My own experiences and context**

My own institution, Birmingham City University (BCU) in the United Kingdom (UK) has a relatively long history of practice-led and practice-based<sup>1</sup> doctorates in art and

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<sup>1</sup> The terminology of such forms of creative research remains problematic, with various terms such as practice-led, practice-based, practice-as-research, design research, artistic research and practice research in use. It is not the place here to explain all these terms - they do

design, and composition, spreading more widely in recent years to include creative practice as part of research degrees in English, Media and Cultural Studies, and Education (both PhD and professional doctorate). I coordinate the PhD in Art and Design, a programme which has included practice-based and practice-led research since the early 1990s. However, my experience of supporting doctoral candidates to navigate university regulations on the format and formatting of a doctoral submission suggests that the official mechanisms of regulation, policy and process for doctorates have not evolved to respond to, reflect and enable the diversity of contemporary forms of knowledge articulation in practice-based research.

I supervise and examine practice-based PhDs in contemporary art, and in my experience there are often tensions between official guidance and practice on the ground, particularly around the format of a final submission. To give some examples, I examined a PhD where the viva voce examination took place in the exhibition gallery and was preceded by an installation performance to the examiners (Horn 2018). As examiners we discussed the art works that were present with the candidate as well as the written text. Another PhD where the viva also took place within an exhibition of the candidate's artwork, (Ceglarz 2018) resulted in deposit to our institutional repository of a thesis submission comprising several separate texts rather than a traditional linear chapter-based written element as well as a film and STL file for a 3D model. Again in 2018, another PhD was examined as an exertive *poiēsis* of art-writing presented in concertinaing A3 landscape format and handsewn volume (Mugridge 2018). In all three instances, navigating the official submission and examination arrangements processes

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have competing definitions and nuanced differences, see Smith and Dean 2009 or Taylor 2019. In this paper I will use practice-based research for consistency.

and forms proved challenging, with acts of translation and further explanation required. With our relatively long history of practice-based doctoral research, BCU's regulations that govern PhD and professional doctorates do have a section on "Creative Work as a Significant Part of the Research Programme" which states that:

"A candidate may undertake a programme of research in which the candidate's own creative work forms, as a point of origin or reference, a significant part of the intellectual enquiry ... In such cases, the presentation and submission may be partly in other than written form, provided that the elements are mutually supportive. The creative work shall be set in its relevant theoretical, historical, critical or design context. The submission itself shall conform to the usual scholarly requirements and be of an appropriate length ... The final submission shall include a permanent record (for instance, video, photographic record, musical score, and diagrammatic representation) of the creative work, where practicable, bound with the thesis." (BCU, 2018, G.52)

Whilst recognising and allowing for creative practice, this is still positioned at least in regulatory terms in relation to the privileging of written text. This is seen in the multiple connotations of 'submission' which is initially described as potentially being partly in other forms than written text. However, the regulations then revert to presume that the submission *is* a written text that follows scholarly requirements and contains documentation of the practice. The later section of the regulations on the submission of the thesis for examination (G11) stipulates that the thesis is an A4 bound volume and that permission must be sought for other formats, warning that "candidates using a format larger than A4 should note that the production of microfiche copies and full-size enlargements may not be feasible" (G.11.8). The regulations go on to state that if creative work cannot be bound into the thesis then "material should be gathered into another volume and stored in a rigid container of the same size and colour as that of the bound thesis" (G.11.13.4), in effect presuming the limitation of creative work to A4

dimensions. BCU's regulations therefore recognise practice-based research but still presume and therefore try to include and subsume practice within conventions of academic writing. For example, this meant that the supervisors of Mugridge's doctorate (2018) had to apply for special permission for a text that was not in the traditional A4 format through a process where approval decisions seemed to rest with professional services administrators, rather than supervisors' academic judgement as to the articulation of the knowledge contribution or even the appropriate Faculty committee.

My own lived experiences resonate with literature on practice-based research in doctoral education. Wisker and Robinson's research into experiences of doctoral researchers on what they term creative doctorates in art, literary or professional practice identified "tensions between creative work, university requirements and examination" (2014, 50). In reflecting on her own decision to move institutions during her practice-based PhD, Rebekka Kill concluded that "university regulations are often too inflexible to support innovative submissions for Ph.D. study ... Flexibility is hard to find" (2012, 323).

### **Examining the regulations**

To further understand my own institutions' position and to identify examples of best practice that might inform and introduce more flexibility into a planned refresh of the regulations by our Doctoral Research College, I undertook to survey and compare research degree regulations across a broad section of universities in the United Kingdom. Contextualised in relation to the literature on doctoral education and practice-based research, my research aimed to reveal the degree of understanding of practice-based research and the flexibility and/or constraints through which regulatory practice framed doctoral education in each institution. Taking a broader cross-institutional view, could movement be discerned towards a more inclusive approach to practice-based

research in doctorates?

There are 149 UK Higher Education Institutions with Research Degree Awarding Powers (UKCGE 2020). To create a broad and diverse sample to investigate I selected the top 25 institutions in each of four subject areas as ranked in the results of the UK's most recent Research Excellence Framework assessment (REF 2014) reported in the Times Higher Education league tables, namely:

- Art and Design: History, Practice and Theory;
- Music, Drama, Dance and Performing Arts;
- Communication, Cultural and Media Studies, Library and Information Management;
- English Language and Literature.

These subject areas were chosen as being the four REF units of assessment that my own Faculty of Arts, Design and Media in BCU submitted to, and in which it could reasonably be assumed practice-based research was most likely to reside. However, this combined listing included many duplications. In the spring of 2020, I sourced the various regulation and policy documents that governed doctoral degrees in each university from institutional websites. Not all institutions make such documents publicly available. Therefore, from a hundred REF returns my final sample was reduced to 47 different institutions. The sample includes institutions from all four constituent parts of the UK (England, Scotland, Wales and Northern Ireland) and different types of institution, including research intensives, specialist institutes, post-92 former polytechnics. To further constrain the sample to a manageable and cohesive set of data I purposefully excluded regulations for PhD by publication/published work which

recognises prior research contributions rather than new research undertaken as part of a doctoral programme of study.

I analysed these documents through close reading and qualitative content analysis rather than adopting a statistical approach. This was due to in part to the variance in the purposes, formats, structures and hierarchies of the various regulations and policies that comprise governance of research degrees across institutions in the UK which made direct comparison or categorisation difficult. The documents collected varied from relatively short statements of principles in several pages, to detailed outlines of both principle and procedure in tens of pages, and research degree regulations being included as part of overall sets of regulations for the institution including undergraduate and taught postgraduate programmes running to hundreds of pages. Often the rules governing doctoral education are contained across a family of cross-referenced and inter-related documents including regulations, ordinances, policies and guidelines. The relative degrees of authority of these documents is not always clear, guidelines in many places seem to serve as enforceable rules. In the vast majority of institutions in my sample, the regulatory frameworks governing doctoral study are not student-facing in how they are articulated and presented, nor would they necessarily be easily discoverable or user-friendly for research degree supervisors.

Based on my own experiences, I analysed each institutions' regulations and policies to identify:

- If and where in the documents practice-based research was included
- What formats were outlined, assumed and/or imagined for a submission
- The word-lengths permitted for the written element of a practice-based submission



My aim was to try both to uncover models of good practice in enabling practice-based research within doctoral degrees, and to identify the prevailing conceptualisations of doctoral research informing regulatory frameworks and the constraints these might impose on doctoral education. To this end I also compared my findings with the *UK Quality Code, Advice and Guidance: Research Degrees* (QAA, 2018) and *Doctoral Degree Characteristics Statement* (QAA, 2020) as well as the requirements of the Arts and Humanities Research Council for its funded doctoral training partnerships as outlined in the *AHRC Training Grant Guide 2019-2020*. I did not however find significant influence on the detail of university documents with specific regard to practice-based research from these sector frameworks. This is perhaps not that surprising as the national frameworks do not legislate at subject level and UK universities have considerable autonomy in constructing their regulations.

### **What do the doctoral regulations and policies tell us?**

#### ***Revealing positions***

My analysis surfaced a number of patterns and themes that I argue are worthy of note for the sector, not just my institution. Despite being somewhat prosaic and dry documents, the regulations and policies suggest stories and narratives around legitimacy and hierarchy in the positioning of practice-based research.

Of the 47 institutions in my sample, I found mention of, or allowance for, practice-based research in 29 institutions' main governance documents for research degrees. In a further nine institutions, whilst practice-based research was not acknowledged in the main regulations or equivalent governance document, it was catered for in a supplementary document of a lower hierarchical order. Admittedly the great degree of variation in length, style and coverage of the main governance

documents make it difficult to read too much significance into document hierarchies when comparing across institutions. For six institutions I could find no mention or recognition of practice-based research in doctoral study at all, and for the remaining three I could not be certain whether it was catered for as not all the levels of governance document were available online. However, the majority of institutions did formally acknowledge practice-based research at doctoral level.

But this is not to say that the 29 institutions recognising in their main research degree regulations the possibility of practice-based research in a doctorate did so to the same degree. The most common positioning of practice-based research in the governance documents was under the relevant sections on thesis formats and submission, often coming after edicts on word-limits and typographical instructions. Thus practice-based research appears to be considered almost as a stylistic choice in terms of final presentation of a thesis. This impression is compounded when further details in other sections or other documents refer to creative practice and its documentation as supplementary (University of Bedfordshire, 2019) or additional (Sheffield University, 2019) and thus privilege the written text as the main locus of the research.

It would be wrong however to give the impression that this was universally the case. For example, at Goldsmiths, University of London<sup>2</sup>, as well as mention in the main *Code of Practice for Postgraduate Research and Training* (2020), Annex A is devoted to "Practice-based research degrees". At the University of Ulster, the nine-page *Regulations for the Degree of Doctor of Philosophy (PhD)* (2019) do include a

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<sup>2</sup> The University of London is a federated university with 17-member institutions, each of which has its own regulations.]

substantial final section of “Guidelines for PhD submissions involving practice”. There is legitimisation of practice-based research in dedicating a sub-section to it. Some institutions have gone further. Part nine of the *General Regulations* the University of East London (UEL) covers research degrees and begins with some general principles, the third of which states: “Our research degrees are awarded primarily on the basis of a substantial thesis or body of published work or equivalent research output in a form other than the written word” (2019). Here the potential and equivalence of practice-based research and knowledge articulation in other than written forms are acknowledged and foregrounded from the start of the governance document.

In 15 of the 47 institutions that I examined, practice-based research is recognised and provided for only in specifically named disciplinary fields, generally but not exclusively the creative arts subjects. Where different governance applied, provision for practice-based research was far more common for PhD study than for professional doctorates. This was of interest to me, given my own experience at BCU of creative practice in doctoral education spreading beyond creative arts subjects to education and recently health, and including professional doctorates.

At Royal Holloway, the *Research Degree Regulations* recognise “research in which practice forms a core methodology and mode of research” and include specific clauses for various disciplinary fields (2019). As well as the more obviously creative fields where practice-based research is established, creative practice is provided for in clauses specific to Geography, History and Classics. The regulations also explicitly encompass archival and curatorial work as practice.

The *Academic Regulations for Research Degrees* (2019) at the University of Westminster have a clause covering where creative work forms “a significant part of the intellectual enquiry” for PhDs, but practice-based research/creative work is not

mentioned at all in the section for professional doctorates. Whereas at the Open University, there is a clause under thesis submission for PhDs for what is referred to as “a thesis that contains a non-book component” that outlines a practice-based submission, and exactly the same wording appears in the equivalent section on professional doctorates, albeit with a shorter maximum word length (2019). The Open University does not mention any disciplinary restrictions on practice-based research in doctoral study. At the University of Sussex, as well as provision for practice-based research in Music Composition, Music-Theatre performance, Creative Writing and Media Practice, the regulation for MPhil and PhD permits that: “The use of alternative modes ... may also be available for use on other courses, with suitable variation,” subject to the approval. (2018) However, the separate regulation for professional doctorates makes no mention of creative work. There appears to be little consistency across institutions.

Interestingly, in considering the positioning of practice-based research in research degree regulations, few institutions discussed the examination implications of alternative formats of submission. There were a few exceptions. At Leeds University the *Protocol for practice-led research degree candidatures* recognises that if live practice is to be considered part of the submission, then examiners may need to be appointed early as “examiners are normally expected to view live practice” (2017). Similarly, as part of an appendix of regulations for specific awards at Lancaster University, the section on research degrees at its Lancaster Institute for Contemporary Arts sets out a requirement for examiners to attend performances. It also is explicit that examiners can request amendments to the practice component of practice-based research submissions:

“19. ... they can also require the candidate to amend or revise the practical component in part or in whole, but only on the condition that they are not satisfied that any shortcomings in the practical submission can be compensated or accounted for in the written thesis. In such a case, the examiners should, wherever possible, set a cost-effective practical assignment that addresses their concerns rather than demand a revision of the original practical work in its entirety.” (Lancaster, 2019)

This suggests an interdependent relationship between the practice and written components. An explicit statement that the practice can be subject to amendment following examination seems to counter a presumption that it would not be, and there is a preference for further explication in the written element if possible. The reasons for this may be pragmatic, given the reference to cost-effectiveness for the candidate, but they may also indicate the privileging of the written text once again.

### ***Practical yet normative prescriptions***

Several institutions use wording to describe the content and purpose of the written element that is familiar to me from the regulations at my own institution. Phrases repeated across multiple institutions include the use of “point of origin or reference” to describe the creative practice and “relevant theoretical, historical, critical or design context” to outline the purpose of the written element. There is perhaps a common influence as the UKCGE’s report on *Practice-based Doctorates in the Creative and Performing Arts and Design* (1997) used very similar phrases.

The use of similar phrases across institutions does not however indicate a coherent position across the sector on the relationship between practice and writing. There is even little consistency in the terminology used to describe written elements, with thesis, commentary, explanatory text, written text, written component and exegesis all in use. At the University of Bedfordshire, the *Academic Regulations* are explicit that there is a hierarchy between the written element and creative practice in a doctorate:

"4.1.22.5 The research may include creative work forming, as a point of origin or reference, a significant part of the intellectual enquiry. The written thesis may be supplemented by material other than in written form. The supplementary material must be clearly presented in relation to the argument of a written thesis ... It is the thesis which provides the basis for the examination" (2019).

Somewhat paradoxically, here the creative practice is both "a significant part of the intellectual enquiry" and yet supplemental. Only the written words are to be examined, thus the written text is conceptualised as fully containing and articulating the knowledge contribution. Conversely, and I would argue much more appropriately, for research degrees in Contemporary Arts at Lancaster University, it is "the practical and written components, which interdependently constitute the "thesis" (2019).

There are several nuanced conceptualisations of the relationships between text and creative practice in articulating the research contribution. Ordinance X at Leeds University specifies "a written submission, which provides an exploration of the research question(s) and indicates the manner in which the research is *embodied* in the practice" (2019, my emphasis). At Queens University Belfast the *Study Regulations for Research Degree Programmes* position the written element as contextual and explanatory in a similar but more detailed, and hence potentially prescriptive, manner:

"7.2.6 ... A critical analysis, written in English, defining the research objectives of the creative work(s); addressing its intellectual and theoretical contexts; reflecting on research methodologies, production processes and the relation between them; analysing, and outlining other factors taken into account in its conception, development, and conclusions." (2020)

In Royal Holloway's *Regulations* (2019) there is nuanced wording for each disciplinary field describing the nature of a practice-based submission and suggested relationship between words and a body of creative/practical work. Importantly though, and an example of effective practice, the regulations recognise that balance between written

and practice elements will depend on the individual research project and should be negotiated between doctoral researcher and supervisory team.

A recurring element in the various regulations is that practice-based doctoral researchers need to seek approval, either for the practice-based nature of their research or for the format and nature of their final submission, sometimes for both. Sheffield Hallam University's regulations (2017) do have a specific clause on practice-based doctorates, however permission must be sought to submit anything not A4 and the regulations also specify preferred fonts and the weight, hence quality, of paper to be used. The timescales in which the format of a submission needs to be agreed vary, with some institutions requiring this to be decided quite early on in the research project. Whilst practice-based research is not mentioned in the Swansea University's regulations, the *Guide to Submission and Presentation of the Thesis* (2020) does have a section on the 'Practice-Based Research Degree Thesis' which requires that this must be requested prior to confirmation, which takes place at three months for those studying full-time. At the University of Ulster, the *Regulations* set out that a practice-based research doctoral study must be approved at application stage, and that the potential form of practice outcomes and balance of written text and practice are to be confirmed at Initial Assessment of Progress, which is at only 4 months for fulltime study. After that "any amendments to the nature or extent of the practical component shall be approved by the Faculty" (Ulster 2019). Such timescales raise questions about flexibility and recognition of the emergent, experimental and iterative nature of creative practice in practice-based research.

The authority to make these decisions rests in different places and not always with the practice-based researcher and their supervisors. For instance, at De Montfort University doctoral researchers need to seek permission of a Research Committee for

submission in other than A4 format (2019). The University of Manchester's *Presentation of Theses Policy* (2019) requires that the format and balance of the written and practical components must be decided within twelve months of full-time study (or equivalent) by the supervisor and the doctoral researcher "and recorded in writing and forwarded to the relevant graduate office for approval" (Manchester 2019). Depending on how this is enacted on the ground, the final decision could be an administrative rather than academic judgement. At Leeds University, confirmation of "practice-led status" has to be made at transfer stage which is at 12 months for fulltime study and the format of the final submission defined, with particular constraints on live performance:

"3.3 ... An intention stated at the transfer stage to include live practice in the final examination will not be binding. If research determines that a live element is no longer required (or dates change), this should be reported as soon as possible and will not have any adverse consequences for the PGR. However, PGRs who do not declare an intention to include live practice at transfer stage will not be permitted to include live practice as part of the final submission." (Leeds 2017)

Here whilst the likelihood of changes to the envisaged nature of a practice-based submission are acknowledged, the flexibility seems unbalanced and changes are only permitted in one direction for live performance. Of course, with any formal governance process, much depends on the interpretation on the ground and the extent to which local practice balances specificity with flexibility, something the policy documents themselves do not capture.

My experience with applicants for practice-based doctoral study in art and design frequently reveals concerns about the percentage weighting of practice and written text in a thesis submission. However, in my examination of the regulations, percentages were rarely if ever explicitly mentioned and can only really be implied by the permitted word counts. On this there was little consistency, and notable differences



in music where texts tended to be conceptualised as shorter. For example, Newcastle University imposes different word lengths for practice-based research in particular doctoral programmes: a 20,000-50,000 critical commentary in a Fine Art and Digital Cultures, Film Practice, Theatre/Performance, or Museum, Gallery and Heritage Studies PhD; a 20,000-40,000 self-critical commentary for a Music PhD; a 30,000 critical study and 3,000-5,000 bridging chapter in a Creative Writing PhD; and a 20,000-50,000 word hard copy thesis document for an Architecture, Planning and Landscape PhD (Newcastle 2020). The subtle changes in terminology also suggesting a different role envisaged for the written element. At the University of the Arts London, there is no difference in the maximum word count for a PhD thesis “regardless of whether the research is text or practice based” although “the minimum word count for a text-based thesis is 60,000 words whereas for practice-based thesis it is 30,000 words” (UAL, 2019). In some instances, not only are word limits given for the written element but similar quantity metrics are in place for the creative practice. At Durham University for example a PhD by Composition is restricted to a 20,000-word commentary and 90 minutes of composition whilst a Creative Writing PhD has a maximum 50,000 words critical dissertation and a creative portfolio of either 50,000 words of prose or 50 pages of poetry (a maximum of 2,000 lines) (Durham, 2018).

In the majority of the governance documents that I considered, it was clear that the written elements of a practice-based doctoral submission were expected to follow standard conventions of academic writing. For example, De Montfort University’s *Regulations* state that “The thesis must itself conform to the usual scholarly requirements” (DMU, 2019). At Newcastle University point 128 of the *Code of Practice for Research Degrees* specifies that for all research degrees a thesis must: “demonstrate skill in writing and presenting research similar to scholarly work” (2019).

Interestingly, at the same institution, the *Handbook for Examiners of Research Degrees by Theses* has an appendix that outlines the requirements for practice-based research degrees in the arts and humanities which notes in Architecture, Planning and

Landscape:

“The design of the thesis document is itself an important concern, which can work in concert with the research, and therefore theses do not have to observe the normal font and line-spacing requirements providing legibility is maintained.” (Newcastle, 2020)

Whilst confined to a particular discipline, this at least recognises that the articulation of knowledge in practice-based research might lead to different approaches to the presentation of both text and practice.

The regulations and policies indicate a prevailing concern with the permanent record of the practice-based thesis, understandable in terms of access to knowledge and the future ability to reference and understand past contributions. Whilst electronic submission of the written text has become a standard, not least for inclusion in the British Libraries EThOS project<sup>3</sup>, the permanent documentation of creative practice is more complex. Research degree regulations and policies concentrated on the practical aspects of this, rather than recognising potential conceptual and philosophical issues. Some institutions specify the precise electronic media that is to be used, others leave it more open as to whether audio-visual material should be submitted on CD, DVD or even USB stick. I found scant mention of other forms of digital information such as

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<sup>3</sup> Run by the British Library, EThOS provides an online national aggregated record of all doctoral theses awarded by UK Higher Education institutions and free access to the full text of as many theses as possible. <https://ethos.bl.uk/>

software or digital objects and there was little on virtual or immersive digital environments or of the archiving of websites produced during practice-based doctoral research. The issues and requirements of digital preservation were notably absent, in contrast to the quality thresholds for the material properties and thus archival longevity of paper and binding for a written thesis.

The University of Newcastle provides a typical example in requiring that the thesis “will be accompanied by a permanent record of the additional material, where practicable, bound with the thesis” (2019). Whilst it is understandable that an institution wants to ensure that the documentation of practice does not become separated from the written element, it is hard to avoid the impression that again the standard A4 written text is being privileged.

If binding with the written text is not possible, the use of an archival box is often required, with official policies seeming to be particularly concerned with the packaging of the container rather than the potential nature of its contents. Whilst at Kings College London practice-based research is not mentioned explicitly in the academic regulations, the online *Format of Thesis and Binding* guidance (2020) refers to 35mm slides and extra material being placed in a pocket at back of thesis and then has separate requirements for music theses which must be in a “regulation blue box” for whom a particular supplier is named that must be used to create a bespoke such box to contain the commentary, scores, CD-ROM. At University College London in the online guidelines on how to *Format, bind and submit your thesis* not only are the specifications of the archival box given in terms of maximum weight and ability to fit in particular sized library crates and shelving, an archival box is required to be present at the viva:

“For the final viva examination, you will normally be required to present your research thesis at UCL. This may take the form of an installation, exhibition,

performance ... The permanent record of the thesis, which may include an archival box of visual material, should be available at the viva.” (UCL 2020)

This raises an interesting conundrum, if an installation, exhibition and/or performance is considered part of the doctoral project and examined as part of the viva, how can it simultaneously already be recorded and documented within an archival box?

### ***Signs of change and more inclusive practice***

As well as highlighting widespread regulations that intentionally or otherwise constrain the possibilities for the submission of practice-based research, my analysis did reveal signs of a changing regulatory landscape. The spreading of practice-based research and resultant change in regulation is for example demonstrated by the fact that SOAS (the School of Oriental and African Studies, a constituent part of the University of London), added specific clauses and information about the PhD by thesis and portfolio “of original creative work” to its *Postgraduate Research Degree Regulations* in August 2018 (SOAS, 2020).

There were also examples of more inclusive framings of doctoral education. As well as UEL’s recognition and acceptance of practice-based research towards the beginning of its statement of general principles for research degrees highlighted earlier, inclusivity is demonstrated through a subtle nuancing of terminology at the University of the Arts London (UAL). Here the phrase “the thesis written text” is used throughout their research degree regulations, thus embedding throughout the concept that the thesis may not solely be a written text (UAL 2019). The regulation specific to practice-based research goes further in clarifying that “the ‘thesis’ is understood to mean the totality of the work submitted for the degree, which will include the creative work itself (or its adequate documentation) and a written text”.

There are other more extensive examples of institutions in the UK embedding recognition and support for practice-based research in regulations covering the full doctoral study lifecycle, not just the final format of the submission. For example, at Bournemouth University, the *Code of Practice for Research Degrees* has a separate section (10.3) on what is referred to at Bournemouth as “practice-led theses” (2019). This is not however a hierarchical othering of creative practice. In what is admittedly a generally detailed document, practice-led research is introduced with detailed articulation of the principles of this “proven method of inquiry”. There is recognition of and justification for the need for flexible approaches to progression monitoring, discussion of the role of supervisors, as well as of the diversity of potential practice outcomes that may sit alongside the written exegesis:

“Outputs for practice-led research may take any number of forms, may be ephemeral and may depend heavily on unpredictable audience interaction ... However, though the practical element of the thesis may be temporary or transitory in nature, good quality documentation of the completed practical element must be included in the submission. This documentation should be appropriate to the nature of the practical element and the form.” (Bournemouth 2019).

The considerations and attributes that examiners need to be attentive to when assessing practice-based research are also outlined. This dedicated section of the *Code of Practice* functions as governance but also provides advocacy, legitimisation and reassurance. It offers an example of how regulatory frameworks might function in more appropriate ways for creative practice in doctoral research.

Bournemouth University is not the sole institution in my sample to take such an approach. For its Schools of Music, Humanities and Media, and of Art, Design and Architecture, the University of Huddersfield has published *Guidelines for Alternative Format Research Degree Theses using Practice as Research* (2020). This 17-page

statement outlines the relationships between written thesis/critical commentary and substantial practical component, as well as covering progression monitoring and supervisory roles and examination criteria. It also provides eight separate subject specialist guidelines, including one for History. At the University of Kent, Annex N of the *Code of Practice for Research Programmes of Study* (2018) entitled “Practice Research” unequivocally states “The University does not privilege any one type of research over any other.” As well as outlining the requirement for support and training in the nature, context, and documentation of practice research for doctoral research, it states:

“4.2.3 While the University acknowledges the importance of the conditions of reception of practice research, it is essential that students also submit documentation of their practice, which can form an accessible and lasting record.”  
(Kent, 2018)

This tacitly acknowledges that a degree of compromise or translation may be involved in submitting documentation of creative practice as part of what it calls the "thesis package".

### **Implications and propositions for doctorates and practice-based research**

My study suggests a mixed picture across institutions in the UK in terms of how practice-based research is encompassed within regulatory frameworks for doctoral education. There are signs of change and examples of more inclusive practice. On the whole however, doctoral regulations have not fully responded to the growth and potential of practice-based research, perpetuating and reinforcing a widespread limited understanding of its nature and potential. It appears that a piecemeal approach is generally taken to amending regulations with Professional Doctorates often an add-on. There is less appetite evident for more systematic and consistent approaches to revision

that might better support practice-based research. The lack of consensus across the 47 UK institutions that I examined, mirrors the findings in an Australian study (Webb, Brien and Burr 2013). Whilst there is a danger of codification antithetical, and even ‘detrimental’ (Macleod and Holdridge 2004 165), to the creative nature of practice-based research in standardisation, a lack of consensus and common understanding can perpetuate uncertainty and “causes anxiety for many candidates and supervisors” (Webb and Brien 2015, 1325).

The governance documents I analysed revealed that hierarchies of legitimacy are sadly persistent, whether explicit as at Bedfordshire, implied, or even when directly confronted through active refutation as at UEL and Kent. Where institutions do not place disciplinary constraints, it is of course difficult to establish from the regulations and policies the extent to which practice-based research in doctorates is spreading to disciplines beyond those traditionally considered creative arts. Whilst 15 of the institutions I studied did impose disciplinary boundaries, the inclusion of programmes in Geography, Classics, History and Museum Studies for example does suggest a broadening of the use of practice-based research. There seems to be a concentration of responses to practice-based research in PhD regulations, with less accommodation for it in professional doctorates if separate regulations apply. Even here though, there are contrasting examples of practice.

In many ways the results of my analysis are disappointing. Approval processes for decisions on submission formats raise questions about flexibility and recognition of the emergent, experimental and iterative nature of creative practice in practice-based research. There is a general conservatism in approach, as recognised by Wisker and Robinson: “in empowering students to produce non-standard formats whatever the discipline, we have conservatism, real or imagined, to contend with” (2014, 53). This is

frustrating as the issues my findings surfaced were identified over twenty years ago, for example in the UKCGE's 1997 report and in Katy Macleod's research into the Fine Art doctorate (2000, 2004).

The key issue of the conceptualisation of the relationship between creative practice and writing in regulations is still contested and does not appear to reflect current practices. Back in 2004, Macleod and Holdridge claimed that: "research evidence has demonstrated that the making/writing issue has gone far beyond a simple binary argument" (2004, 157). However, in regulatory frameworks there is frequently still a separation of writing from creative practice, and not just in creative writing doctorates. The written element is still typically conceived of as a standard academic text, often prescribed by typographical instructions. This does not adequately enable the types of critical creative inter-relationships and hybrid forms of writing practice recognised in the literature (e.g. Hamilton and Carson 2013; Macleod 2000; Wisker & Robinson 2014). Flexibility around word lengths varies, and even with lower maximum word counts, there is also still the danger as Kill noted that doctoral researchers will "produce a whole PhD's worth of practice plus half a PhD of text, hence doing about 150 percent of a PhD!" (Kill 2012, 320).

The implicit privileging of the written element in archival concerns about theses with the emphasis on binding, A4 formats and quality of paper does raise concerns regarding what Ings has termed "authentic" (2015 1279) and Macleod and Holdridge "true representation" (2004 166) of practice-based research in institutional repositories and the permanent record. From my reading of the governance documents, there is a conservative approach towards the digital, it is a challenge and opportunity that has not yet been fully embraced. Ings (2015) notes that whilst many universities still insist on candidates using archive quality paper, many have little idea of the compromise posed



by the non-archive quality printing processes and I found no discussion of the quality of digital storage media such as DVDs and CDROMs where their use was required. The potential of digital formats to enable integrated relationships between text and other forms of knowledge articulation in practice-based research was not evident in the permissions and prescriptions of regulatory frameworks for doctoral research.

We should not be despondent however. As with any formal governance process, much depends on the interpretation on the ground and the extent to which local practice balances specificity with flexibility, something official documents themselves do not capture. Whilst it might have been argued that regulatory frameworks have not adequately responded to the needs of practice in doctoral education because practice-based doctoral research has been a specialist and minority activity, that picture is changing rapidly. This is partly evidenced by the rise of professional doctorates as well as the rise in alternative forms of submission. Further research to examine the numbers of doctoral candidates involved in practice-based research as well as the processes evolving on the ground would be illuminating.

There are already pockets of excellent institutional practice from which institutions can learn, adopt and adapt, enabling better support of practice-based doctoral education with no detriment to traditional models. Nuancing language with phrases such “thesis written element” can counter assumptions that a thesis is exclusively a written text. Importantly such nuancing needs to occur throughout, not just in the regulations on the final format. Similarly, institutions should recognise the need for flexible approaches to progression monitoring during practice-based doctoral study. Key is avoiding a fixed assumption the duality of text and practice, instead enabling flexibility at the individual project level. Universities should better acknowledge the potential of digital formats to more fully embrace interdependencies of

text and practice in research and in its documentation for the future. Whilst regulations can provide legitimisation and reassurance for practice-based researchers, I argue that a more inclusive approach to practice-based research could open possibilities for all disciplines and professions, as well as encouraging more innovative and interdisciplinary doctoral research.

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