

Higher education standards and quality

October 2010

Key proposals

The increasing international mobility of students and graduates, and the proliferation of providers of higher education services and qualifications, challenge governments to find new ways and means of assuring that effective learning is taking place, and safeguarding the integrity of educational qualifications. The expansion and diversification of higher education requires new forms of information and channels of communication about the orientation and quality of different higher education institutions and programs, so that potential participants can make sense of what is available and make informed decisions, and employers can have a reasonable basis on which to compare graduate applicants for jobs.

Thus there is a compelling case for governments to be concerned to ensure that the community can have confidence in its higher education institutions and the programs and qualifications they provide.

However, the government's proposed approach to higher education involves a degree of central regulation and intrusion which is beyond that found in other OECD countries and which is unprecedented in Australia. There are concerns within the higher education community that this approach will be counterproductive because it will stifle diversity, erode quality and reduce the flexibility necessary to respond to unexpected needs and challenges. We believe that the government should conduct a fundamental review of its overall approach to test its assumptions and ensure that Australia can move to a high quality system built on excellence across all areas of need.

A model that recognises mutual responsibilities and expertise, facilitates different provider models and outcomes, and recognises the concerns of the diverse range of stakeholders having a direct interest in higher education outcomes, will go much further in improving performance, promoting diversity and achieving excellence, than will a centrally-mandated compliance model.

By adopting a more comprehensive, gradual and inclusive approach to policy development relating to standards and quality in higher education, the government will be able to achieve greater institutional and professional support and make more effective use of the national and international studies already underway in this area.

The Government should help higher education institutions respond to its policy directions by clarifying its purposes, the meaning of key terms, and the respective responsibilities of governments, institutions, and the role of the market.

Consistency in provider registration and re-registration requirements is essential to avoid rogue providers from setting up and continuing to operate. However, requiring national consistency in institutional practices, educational quality and graduate attainment, on which policy implementation appears to be based, is at odds with the realities of Australian higher education and future needs. Attempts to impose uniformity and standardisation are misguided and will be unworkable because a diversity of needs requires a diversity of responses to provide fit-for-purpose outcomes.

Specifically, the following matters need urgent reconsideration, because their current implementation processes are inconsistent with the stated aims of the Government:

1. Reconsider the role and structure of the Tertiary Education Quality and Standards Agency (TEQSA): A basic flaw in the design of TEQSA is that there is no separation of powers between setting, monitoring and judging standards. It is also unclear how different aspects of the 'quality and standards framework' will interact with institutional registration, course provision and funding. State & Territory governments, and the Australian parliament, should exercise caution in consenting to potentially draconian arrangements and related regulation.

TEQSA should not have any legal power to set standards. Rather its powers should be to monitor, evaluate and report on how well providers meet the standards they set for themselves and the expectations determined by government and other stakeholders in relation to capacity and performance.

Higher education provider registration standards should continue to be set by the inter-ministerial council of the Commonwealth, states and territories. This approach, reflecting the principle of cooperative federalism, is most likely to achieve national consistency, both through the setting of inter-governmentally agreed standards and the alignment of state and territory legislation relating to providers established statutorily by those jurisdictions.

In all other areas, higher education providers should set the standards themselves, as this is the best way to promote innovation and diversity in the national system. Providers should continue to be able to draw upon references to guide their standards setting, such as the Australian Qualifications Framework, and various statements of expectations regarding academic standards for curriculum, teaching, assessment and in other areas, including the various requirements of professional associations in respect of qualifications for professional practice. These references are necessarily dynamic and should not be part of a legislated regulatory framework. TEQSA's role should be to verify that different higher education providers are achieving the standards they set for themselves rather than prescribe a common set of standards for all.

2. Tighten provider registration requirements: Australia's main problem in the area of education provision has been among private VET providers, and some higher education providers, through lack of national consistency in initial registration requirements and regular monitoring of provider compliance with conditions of registration. The priority is to focus on the threshold standards for provider registration, according to the principle of regulation proportional to risk. This should be TEQSA's top priority.

3. Re-open the revision of the Australian Qualifications Framework (AQF): The 'strengthening' of the AQF is too narrow and prescriptive. It is premature to combine higher education within a framework for VET which is itself unsettled. The AQF Council is proposing a model that exists nowhere else and runs contrary to best practice principles. A linked rather than unified model should be adopted for a revised AQF, with curriculum-based higher education awards distinguished from competency-based vocational education and training awards. The AQF should function as a descriptive reference rather than a prescriptive mechanism. It should reflect the contemporary offerings of Australian institutions rather than restrict or prohibit reputable qualifications that respond to student needs and international competition. Its focus should be on the level descriptors and the learning outcomes associated with them, with flexibility allowed in award titles, reflecting international practice. Any references to study duration and credit transfer should be in the form of guidelines rather than policy directives.

4. Explore warily standards-based learning outcomes as benchmarks for higher education institutions in reviewing curriculum and assessment: Australia is participating in the OECD's Assessment of Higher Education Learning Outcomes (AHELO) feasibility trials (Engineering). It will take some years before feasibility is evaluated, and the results should not be pre-empted.

The Australian Learning and Teaching Council (ALTC) is piloting a set of disciplinary descriptors of threshold academic standards in a range of fields. The processes, if not the results, may assist professional dialogue and institutions' approaches to curriculum and assessment. However, they would not be appropriate for TEQSA to use as regulated benchmarks, because such an approach would stifle diversity and dynamism. The ALTC process is of marginal value and very inefficient.

5. Abandon the Teaching Standards Framework: The ALTC is funding a project to develop a set of teaching standards for TEQSA to use in auditing universities. This approach intrudes on important areas of university autonomy, including academic staff appointment and promotion policies and procedures; staff probation, performance, study leave and professional development; institutional grants and scholarships; and student evaluations of teaching. There is no identified need to justify such interference by TEQSA, and the approach is inconsistent with the Government's stated workplace relations policies.

6. Customise performance-related funding: Performance funding should be related to the specific circumstances and goals of each university. Standardised tests and value added measures are invalid and inappropriate for this purpose. There is a degree of entrapment involved for universities which had to agree to participate in performance

funding through compacts, as a condition of access to indexation, but without knowing what measures would be used. No further information has been made available to universities since an initial discussion paper was released in December 2009. The responses to the discussion paper have not yet been made public.

Given the growing complexity and diversity of higher education, and the varying information needs of students, it is curious that political pressure is being applied to require higher education institutions to give most attention to reporting on the least reducible aspect of their work—the quality of learning—through simple metrics and simplistic comparisons. The times call for more sophisticated transparency tools.

7. Improve transparency about institutional differences: Whereas some advisers suggest that students need to know what is common in higher education performance, most students want to know how various learning opportunities differ. Government should require all higher education institutions to publish profiles on MyUni that provide prospective students with information to guide their study choices, including information about: the distinctive features of the institution; course offerings, student services, course costs and scholarships; student mix, progression and completion rates, and graduate destinations and satisfaction indicators; the criteria used in student assessment, and the processes used by the institution to verify the quality of education with reference to the institution's goals and criteria and, as appropriate, national and international benchmarks.

Go8 universities intend to adopt a modified form of external examining, including publication of peer assessments.

Alongside the academic transcript, the Australian Higher Education Graduate Statements (AHEGS) is useful for graduates in providing information about the Australian education system and the international equivalence of qualifications. The Government might also consider the development of a typology of institutions, along the lines of the U-Map model.

8. Deal with the cause of the quality problem: Quality of output is a product of inputs as well as processes. If the funding rate per domestic student is inadequate and declining over time, the scope for quality improvement is necessarily limited, notwithstanding increases in the productivity of teaching and learning.

9. Work to rebuild trust: In its pre-election statements, both in 2007 and 2010, Labor has indicated a commitment to openness and evidence-based policy formulation, along with an intention to respect university autonomy and academic freedom, and to have regard to mission differences among institutions, through funding compacts and other mechanisms. Universities have yet to see these commitments reflected in Government practices. Indeed, there has been a disconcerting lack of transparency in the public policy processes relating to higher education standards and quality. And all the available evidence suggests the Government favours a formulaic and uniform policy approach.

Issues and challenges

A number of factors are conspiring to put pressure on the quality of higher education. The most significant are:

- enlarged student participation in higher education, involving a more diverse mix of students with varying backgrounds, aptitudes and motivations
- growth and diversification of higher education suppliers
- changing modes of educational access, delivery and participation
- international mobility of students and graduates
- reduction in the funding rate per student
- changes in the nature of academic work, including greater use of casual teachers, preferencing of research over teaching, and loss of shared norms relating to assessment
- reduced student time at study, and changing patterns of student engagement in campus life
- instances of provider fraud, and
- incidents of plagiarism, and soft marking.

Additionally, higher education is being asked to meet a range of new expectations:

- Labour market relevance and learning effectiveness: governments are under intensifying pressure to secure the capacity of their economies to generate the wealth necessary to provide the services needed in a more demanding future, and if they cannot improve the skills base required to move up the curve of value added economic activity their economies will falter and talent will flow elsewhere.
- Graduates for a global society: in many cases, students are preparing for work as global graduates, and their credentials need to be useful for work and further learning wherever in the world they want to make their way.

Nevertheless, it is important to avoid instrumentalist purposes from being too narrowly constructed lest they jeopardise the very foundations of the contributive capacity of universities.

Taken together these pressures and expectations require new ways to ensure that the community can have confidence in its higher education institutions, and the programs and qualifications they provide. Attention needs to be given to:

- **Probity:** institutions can demonstrate that they have adequate capacity and integrity to deliver what they undertake to deliver.
- **Effectiveness:** students are acquiring the knowledge, understandings and abilities expected.
- **Comparability:** students and employers can see similarities and dissimilarities between different programs, learning opportunities, expected standards and graduate attainment and outcomes.
- **Transparency:** institutions publish information about their distinctive offerings and requirements, along with clear criteria and codified procedures for judgements relating to admission, credit, and assessment grades.

Government response to the challenges

A solution looking for a problem?

The bundling of different purposes (e.g. to ensure minimum standards of operation, to address quality erosion, to promote 'seamless' lifelong learning, to improve employability of graduates, to compare graduates of different institutions) within a single policy envelope (standards-based performance accountability) makes it difficult to discern which problem the solution is designed to resolve. Additionally, there are no apparent major crises, mismatches or distortions in the supply of graduates to the labour market (as evidenced by graduate employment outcomes and incomes), or signs of student disaffection (as evidenced by satisfaction surveys).

The 2008 report of the Review of Australian Higher Education noted that "for at least 30 years, Australia's universities have been paying attention to course assessments, student evaluations, destination surveys, professional accreditation, external feedback and moderation" (Bradley et al., 2008). It noted that the first cycle (post 2001) of external quality audits of universities had "suggested that internal quality assurance processes were generally effective" and that the second cycle of audits (post 2004) looking at how institutions manage academic standards and outcomes, suggested that "this is taken very seriously by universities (with) evidence that institutions are moving towards more external validation of standards such as benchmarking arrangements".

The Bradley review advocated a stronger approach to quality assurance, including "auditing the adoption of outcomes and standards-based arrangements for assuring the quality of higher education". The Bradley report argued that "Australia now lags in hard measures of learning outcomes", drawing attention to the use of external examiners and subject benchmark statements in the UK, the Spellings Commission's recommendations in the US, and the OECD's work on the Assessment of Higher Education Learning Outcomes (AHELO). But the Spellings Commission's proposals were not taken forward, Australia is participating in the AHELO feasibility studies, and several universities, including the Go8 and Wollongong, are developing external examining.

The Bradley panel also argued the need for attention to exit standards in view of its recommendations for unrestricted entry to Bachelor degree programs. The wisdom of that policy advice is questionable, in that the targets set were arbitrary (copying the UK's Leitch targets), having no regard to Australia's labour market requirements, and irresponsible, having no regard to impending growth in student demand and the fiscal implications of funding it.

The companion briefs on financing and structural diversity explore the sustainability of an open-ended approach to higher education admissions funded at taxpayer expense.

In preparing its advice to the Government, the 2008 Bradley Review misread some important international developments, particularly regarding an alleged shift from 'fitness-for-purpose' quality evaluation to 'standards-based' assessment. The growth in standards-based accreditation around the world reflects the growth in private providers but it operates alongside rather than replaces fitness-for-purpose evaluation.

The elements of the Government's standards and quality framework

The proposed "higher education standards framework" itself has six elements: (i) provider registration standards; (ii) provider category standards; (iii) information standards; qualifications standards; (iv) benchmarks for teaching and learning quality assurance; and (v) research standards.

No information is available about the proposals for *provider registration standards*, which would replace the National Protocols for Higher Education Approval Processes. Their main purpose appears to be the removal of inconsistencies among the States & Territories in registration requirements. An early draft was repudiated by the sector because of its excessive reporting requirements. Similarly, it is not clear what the *provider category standards* will require.

Benchmarks for teaching and learning quality assurance: The Australian Learning and Teaching Council (ALTC) has been funded by the Australian Government to explore the development of "academic standards" in a number of fields: history, geography, accounting, creative and performing arts, engineering and ICT, health, and law. The approach is more like the UK's 'Subject Benchmark Statements' than the European Tuning exercise; while the work is being done by the academic community, it is designed to relate to accountability through TEQSA and then be "overseen" by TEQSA. However, the ALTC project goes well beyond both Tuning and Subject Benchmark Statements, which are 'mapping' references, by specifying standards for internal assessment and external audit purposes.

Teaching Standards Framework: The Australian Government through the ALTC has also funded a Macquarie University led project to test Macquarie's teaching standards framework in six universities (including Macquarie) for adoption across the Australian higher education sector. The project aims, inter alia, to collate information from each participating university "on how it would propose to report on compliance with the Teaching Standards Framework both internally and to government, and the development on this basis of a set of arrangements by which institutions could report on their performance against the Teaching Standards Framework to DEEWR or to TEQSA." The Macquarie University template for its "Teaching Quality Indicators Project Benchmark Statements for the reward and recognition of learning and teaching quality at the Institutional level" cover standards relating to: academic staff appointment policies and procedures; probation policies and processes; performance, development and review policies and procedures; promotion policies and procedures; study leave and conference leave policies; professional development policies; policies for learning and teaching awards, grants and scholarships; student evaluations of teaching, and peer review of teaching.

MyUni website: the site has been presented as an extension to Higher Education of the *MySchools* website model of providing 'transparent' information to parents about the comparative performance of schools on standardised tests of their students. Its extension to Higher Education can only be predicated on the contested assertions that contemporary higher education is not much more than a later stage of schooling, that what matters most is the formation of generic skills (there is also a *MySkills* website for VET), that meaningful differences in institutional performance can be revealed by aggregates of individual student performance, that performance information will guide student choice, and that university teaching will improve as a consequence of public reporting of such information. It would have been beneficial to have prior market research into what students want to know in making their decisions about study options.

An Indicator Framework for Higher Education Performance Funding: In its response to the Bradley Review, the Government committed to a more transparent and more favourable basis for annual indexation of its recurrent payments to higher education institutions. As a quid pro quo, the Government made access to the improved indexation conditional; funding would be provided for those institutions which "agree to sign on to the achievement of institutional performance targets" From 2012, institutions would be "rewarded" for their achievement of the targets via a performance

funding stream. There was a degree of entrapment in this conditionality, given that the nature of the performance targets had not been determined at the time the 'sign-on' was required for access to the new indexation of base funding, which dwarfs the specific pot for performance funding. In December 2009, the Education Department issued a discussion paper on An Indicator Framework for Higher Education Performance Funding. As at September 2010, there has been no indication from the Government of its intentions in response to the feedback on that discussion paper.

The discussion paper started from the premise that TEQSA and Compacts in combination would provide the regulatory checks:

TEQSA: will "take the lead in establishing minimum standards that higher education providers are required to meet to ensure the overall quality and performance of the sector", "facilitate discipline-based communities in the development and implementation of discipline specific standards," and "assess whether universities have met their targets, and its advice will inform the allocation of performance funding".

Compacts: will provide "a framework for jointly achieving the Government's reform agenda and institutions' individual missions", including "a teaching and learning component, which will include the targets for performance funding" (DEEWR, 2009).

The main proposals in the discussion paper related to the nature and form of the targets set as a basis for performance monitoring and funding. A threshold policy issue, but one which the paper evaded, is the extent to which the performance indicators are common to all institutions or customised for each. In meetings around the issues, Departmental officers gave more weight to national than institutional indicators. The key indicators proposed in the paper are outlined below:

- i. Student participation:** universities will be required to maintain a base-line number of students for each equity group category (based on number of students in 2010), and negotiate a percentage point increase in access share for those groups. *Not all universities want to grow their undergraduate numbers; many of our leading universities are much bigger than their peer universities overseas.*
- ii. Student experience:** percentage point improvement in retention rate; percentage point improvement on student satisfaction score (CEQ scales for 'Good Teaching' and 'Overall Satisfaction' weighted equally).
- iii. Student achievement:** percentage point improvement in progress and retention rates. *In the instances where universities are performing very highly on these measures, a percentage point increase will be meaningless.*
- iv. Learning outcomes:** (a) increase in proportion of teaching staff with a Graduate Certificate in Higher Education or equivalent; (b) percentage point improvement in student satisfaction with generic skills (CEQ); (c) percentage point improvement in employment and further study outcomes; (d) use of the Graduate Skills Assessment (GSA) test as an indicator of institutional value added. *There is no evidence a GCHE leads to an improvement in teaching quality and the GSA is not designed as a value add tool, nor does it provide information on the learning outcomes at the discipline level, which are also important to employers.*

Strengthening the Australian Qualifications Framework (AQF): No country in the world has a qualifications framework relating to higher education that is so prescriptive and narrow as that proposed by the AQF Council. The current proposal looks to:

- replace the current sectoral divisions (e.g. VET, HE) with a single set of award levels, thereby focussing on the qualification as testimony to skills formation, however and wherever achieved
- develop 10 levels of increasing complexity against which qualification types are located
- specify learning outcome-based descriptors for each qualification type "based on a common taxonomy of knowledge, skills and application of the knowledge and skills with embedded generic skills"
- indicate a notional duration of student learning for each qualification type
- provide a tight mapping of qualifications titles to levels of learning outcomes
- restrict the use of qualifications titles to a narrower set than are current awarded
- mandate automatic learner entitlement to a base level of credit transfer for previously completed awards.

The removal of sectors in the AQF is not a trivial matter, especially given the historical struggle of the university sector to avoid a reduction of higher education to training. In other countries, such a threshold decision is usually subject to extensive consultation, rather than an assumed starting point. England has a totally separate framework for higher education qualifications, Scotland has a 'tracked' comprehensive framework, where higher education is in a distinctive track, Ireland has a 'linked' framework where equivalences are indicated across qualifications on different tracks, and New Zealand has a competency-based approach for its vocational qualifications but not for its higher education qualifications.

The AQFC is proposing a 'unified' framework with no tracks and a common taxonomy of learning outcome descriptors mainly related to occupational competences. This is a courageous policy proposal, especially in the light of international evidence that there is practical value in allowing for sector differences within an overall framework, that the most successful NQFs appear to be those with the most modest ambitions for system change, and concerns about the narrowing impact on education of competency-based assessment and the adverse consequences for those most disadvantaged in educational background.

It is premature to combine higher education within a framework for VET which is itself unsettled. A number of underlying policy issues need to be attended to, as the national VET policy fabric woven in the 1990s is worn and unravelling. The most pressing questions are:

- What is the role of vocational education and training?
- To what extent should VET be industry-led or student-driven?
- What role should competency-based training play?
- How should competence be understood?
- Can or should VET be defined as a distinct sector?
- Is VET moving in a bifurcated direction?
- What should be the future structure of VET provision?
- How should VET be financed?
- What are the most appropriate steering and governance mechanisms for VET?
- How should VET quality be assured?