

**Australian Universities Quality Agency
Setting and Monitoring Academic Standards for Australian Higher Education
Discussion Paper, May 2009**

Innovative Research Universities (IRU) Australia Response

Dr David Woodhouse
Executive Director, AUQA

Thank you for the opportunity to comment on proposed approaches to setting and monitoring academic standards for Australian higher education.

IRU Australia acknowledges the critical importance of setting and monitoring academic standards and supports the conclusion of the Bradley Review of Higher Education that 'Australia must enhance its capacity to demonstrate outcomes and appropriate standards in higher education' (p. 14).

While the AUQA Discussion Paper has set the scene for a national discussion and debate on how best to enhance capacity, IRU Australia is concerned that the proposal put forward represents a single system-wide 'all-or-nothing' approach which does not adequately acknowledge the complexities involved, existing knowledge, experience and capacity within the sector or the sustainability of the approach.

IRU Australia argues that:

- A national roadmap and timetable needs to be developed to ensure appropriate coordination of related higher education quality assurance developments (revision of the AQF, establishment of TEQSA and development of a national approach to academic standards).
- Further attention needs to be given to
 - Developing a precise and consistent set of definitions of relevance to the setting and monitoring of academic standards
 - Defining a clear set of objectives for a national approach to academic standards.
 - Better articulating the approaches and outcomes that are already in place.
- A national approach to academic standards needs to
 - Be informed by a thorough analysis and evaluation of existing structures and processes, including professional accreditation frameworks
 - Engage fully with discipline and professional diversity

- Build on, and strengthen, existing capacity across the sector by fostering collegial and collaborative activities within and across disciplines and professions nationally.
- A national approach must be underpinned by an appropriate cost-benefit analysis undertaken with reference to clearly articulated objectives and taking into account the costs associated with existing approaches.

IRU Australia looks forward to working with AUQA and other institutions on developing appropriate and sustainable approaches to setting and monitoring demonstrably high academic standards for Australian higher education.

Sequencing, timing and alignment of separate quality assurance developments

Given the importance and centrality of better articulating the issue of academic standards in higher education, it is critically important for the different components of a national quality assurance framework to be strongly aligned, coherent and consistent.

A national approach to setting and monitoring academic standards needs to be closely aligned with the revised Australian Qualifications Framework. Basic questions, for example, such as the learning outcomes taxonomy to be adopted will need to inform the development of a sector-wide system for monitoring standards.

The government has announced that the new Tertiary Education Quality and Standards Agency (TEQSA) will be established with a mandate to work with the higher education sector to develop objective and comparative benchmarks and to carry out rigorous audits. IRU Australia believes that it would be premature for the sector to adopt an approach to setting and monitoring standards before this Agency is operational and able to engage fully with the associated issues in the context of its broader functions and the revised AQF.

A coordinated roadmap and timetable needs to be developed, covering all relevant agencies and developments, and outlining a sensible and feasible sequencing and intersection of related developments over the next two years.

The definition of academic achievement standards

The Discussion Paper appropriately draws attention to the need for a shared definition of ‘academic standards’ in Australian higher education. This is critically important to progressing a national discussion and debate on how to set and monitor academic standards.

IRU Australia is concerned that the Paper does not succeed in providing a precise definition of ‘academic standards’, or in acknowledging the range and types of assessment tasks and their capacity to elicit the learning commensurate with nominated standards in a discipline. The Griffith University submission provides a more detailed discussion of these concerns.

There is an extensive body of academic literature on the purpose and meaning of academic standards and assessment which could productively be drawn upon to provide a consistent definition of terms and common conceptual framework to inform future discussions.

Building on existing knowledge, approaches and capacity

While IRU Australia acknowledges that there is room for advancement in terms of defining a national approach to the setting and monitoring of academic standards, there nevertheless exists numerous examples of practice and experience across the sector that deserve to be acknowledged and evaluated, in terms of their benefits and limitations, prior to embarking on the development of entirely new systems.

Extensive long-standing processes, for example, exist for the purposes of the accreditation of courses by professional bodies and professional registration of graduates.

The work emerging from major national projects, such as the Australian Learning and Teaching Council Quality Indicators Project, also needs to be considered. Some of the institutions involved in the Project have focussed on developing quality frameworks for assessment, moderation and standards.

A national approach to setting and monitoring academic standards also needs to draw on existing measures and data sources, such as the Australian Graduate Survey, which provide measures of future 'success' in terms of graduate employment.

There are potential lessons to be learned from history (e.g. Academic Standards Panels of the 1980s-90s; Discipline Reviews conducted in the 1990s).

The 'buy-in' of academic staff and the professions, and the development of a performance culture, will be essential to the success of any emerging national approach to academic standards. A national approach needs to build on, and strengthen, existing capacity across the sector by fostering collegial and collaborative activities within and across disciplines and professions nationally.

The proposed approach reflects an overly prescriptive 'top-down' strategy which does not adequately acknowledge the critical importance of engaging fully with discipline and professional diversity and building capacity at the discipline, professional, institutional and national levels.

Cost/benefit and sustainability

The UK Quality Assurance Agency (QAA) has recently published a report: *Thematic enquiries into concerns about academic quality and standards in higher education in England*. This Enquiry was commissioned following enduring concerns about the quality of academic standards. While the UK has in place a comprehensive set of mechanisms for setting and monitoring standards of the type being proposed by AUQA, it is not universally judged as being successful in achieving the objective of providing public assurance that quality standards are being maintained. These mechanisms include:

- *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ) and the Framework for Qualifications of Higher Education Institutions in Scotland;*
- *The Code of practice for the assurance of academic quality and standards in higher education;*
- *Guidelines for Preparing Programme Specifications;*

- Subject benchmark statements which set out expectations about learning outcomes, indicators, measures and standards of degrees in a range of subject areas;
- A well-established system of external examiners; and
- A formal programme of institutional audits.

There are clear lessons in this for Australia. While there is undoubtedly scope to enhance current practice and systems for setting and monitoring academic standards in Australia, there needs to be some caution in how we choose to do so.

We note that the AUQA Discussion Paper acknowledges ‘the complexity of setting standards in the manner proposed’ and also states ‘Such a process would require extensive review, analysis, modelling, consultation and documentation.’

IRU Australia is concerned that the proposed method for developing a national standards approach is overly complex and potentially unwieldy. The feasibility of a workable, rigorous mechanism for reviewing, maintaining and updating the statements of discipline-specific academic achievement is not adequately explored.

The Discussion Paper does not provide a clear statement of the objectives of a national standards approach. Without this, it is difficult to assess whether the method proposed is ‘fit for purpose’ or whether the costs and benefits are appropriately balanced.

IRU Australia argues that a national approach must be underpinned by an appropriate cost-benefit analysis undertaken with reference to clearly articulated objectives and taking into account the costs associated with existing approaches.

IRU Australia Contacts:

Professor Kevin McConkey
Chair, IRU Australia Academic Group
Kevin.Mcconkey@newcastle.edu.au
p: 02 4921 5114

Ms Lenore Cooper
Director, IRU Australia
l.cooper@griffith.edu.au
p: 02 6684 3863
m: 0408 760 592

Member Universities:

Flinders University
Griffith University
James Cook University
La Trobe University
Murdoch University
The University of Newcastle