

Developing a Framework for Teaching and Learning Standards in Australian Higher Education and the Role of TEQSA: IRU Response to Discussion Paper

The discussion paper *Developing a Framework for Teaching and Learning Standards in Australian Higher Education and the Role of TEQSA* provides a solid basis for exploring:

- the intent and purpose of the Teaching and Learning Standards; and
- how they should be developed and implemented both initially and over the longer term.

In this response the IRU addresses the ten specific questions posed in the Discussion Paper against the various issues that underlie those questions.

The policy context for national Teaching and Learning Standards

What are the Teaching and Learning Standards to achieve?

The challenge for the creation of the Teaching and Learning Standards is to achieve Standards that both:

- define essential aspects of teaching and learning that all higher education providers should achieve; and
- provide a framework against which higher education providers can demonstrate their level of achievement.

The relationship to the Threshold Standards

The relationship of the Teaching and Learning Standards to the Threshold Provider and Course Standards is stated in the paper (p5) but not addressed in any depth. This will be required as the Teaching and Learning Standards process develops.

The TEQSA Act 2011 sets the Threshold Standards as those which every HE provider must meet to be approved as, or renew approval as, a HE provider.

- The Provider Standards are clearly about the minimum requirements for operation in the HE sphere. They do not go to achievement beyond the requirements although in particular areas good governance and management does mean that IRU members and other universities well exceed the requirements in the draft Provider Standards. These include elements concerning the accreditation of courses which strongly interacts with the teaching and learning associated with those courses.
- The Qualification Standards define the essential nature of the nationally recognised qualifications which HE providers may issue. For universities the Qualification Standards provide the future legal basis against which their accreditation of the courses they provide should be based.

Hence the Teaching and Learning Standards need to be distinct from the course accreditation element of the Provider Standards and build off the nature of the qualifications issued as defined in the Qualification Standards.

The use of the Teaching and Learning Standards

The use of the Teaching and Learning Standards remains to be defined as they are developed and the quality framework develops. Currently HESA requires, as a condition of funding, a form of quality audit by TEQSA, which would apply to all HE providers whose students are eligible for FEE-HELP.

Issues 1 and 2: the definition of Teaching and Learning Standards and the proposed two domain approach

The IRU considers the proposed two part definition, with each part supporting a distinct set of Standards, a practical way to encompass the issues that universities and TEQSA need to address. It supports a differential focus on how universities go about ensuring the best learning outcomes for students and a distinct effort to measure the extent of the learning outcomes which students actually achieve.

It is important to retain strong links between the two domains: how students are supported to learn and evidence about what they are learning should interact to the end of improving approaches to student learning so that they do in fact support better student outcomes.

The purpose of the Teaching and Learning Standards thus seems to go beyond what is simply sufficient for HE provision to providing a basis for encouraging and assessing achievement at higher levels. Hence the paper's reiteration that the Standards should be about a minimum requires elucidation. This is considered further below in comment against Principle 5.

In addition the IRU proposes that "knowledge and skills" is insufficient to describe what is achieved through higher education with "attitudes" added as an explicit outcome particularly in professional courses.

Issue 3: the principles for TEQSA's role

The IRU agrees that the seven principles set out in the paper address important issues which should underpin TEQSA's approach to the Standards. The issues addressed are also all of relevance to universities in how they make use of the Standards as one means to demonstrate individually and collectively the quality of the learning and teaching they provide.

- 1. The autonomy of institutions will be respected and TEQSA's processes will accommodate innovation in curricula and support the role of institutional assessment and evaluation activities.*

The key point within Principle 1 is that universities, and potentially other HE providers, drive developments in teaching and learning. The Standards provide an external means to display achievement against current expectations but will themselves need to develop in interaction with how approaches to teaching and learning develop. Universities own evaluative activity is crucial to such development.

- 2. Course and discipline-specific skills and knowledge, as well as the generic skills developed through higher education, will be considered by TEQSA when reviewing Learning Standards.*

The principle correctly identifies the dual challenge of the Standards covering both the specific discipline needs and the generic skills students should acquire. As raised above these should also cover discipline and generic attitudes. There remains a considerable challenge as to how a set of Standards can engage effectively with both, particularly how to address the array of potential disciplines.

- 3. National Teaching and Learning Standards must accommodate the diversity of stakeholders and their viewpoints on Standards. TEQSA is not the only custodian of Standards, nor are higher education institutions. This responsibility is distributed and shared more widely, including with disciplinary communities and professional associations.*

Principle 3 interacts with the first principle in explicitly stating that effective Standards will need to work for multiple interests, with each likely to contribute to future developments – and do so in a way that supports public confidence in the quality framework.

- 4. National Standards for teaching and learning need to be able to respond to change and emerging situations. Standards should be subject to regular review.*

Principle 4 then follows from 1 and 3 in emphasising the developmental and interactive nature of the Standards to counter any bureaucratic tendency to stasis. The Principle could be more sharply worded as:

National Standards for teaching and learning need to respond to change and emerging situations. Standards should be subject to regular renewal.

- 5. Institutional Standards for teaching and learning will differ but all institutions must meet or surpass national Standards.*

Principle 5 requires further development to tease out an effective relationship between the national Standards, as developed by the Standards Panel, and institution's individual and collective approach to ensuring and developing institutional quality. Conceptualising the national Standards as setting a scaffolding of essential elements, and a means to gauge achievement against them, allows for the institutional systems to be more specific, reflecting institutional ambitions.

Rather than 'surpassing' the Standards institutions should define and aim for suitable, high level outcomes against each national standard. The Principle could be more effectively worded as:

Institutional Standards for teaching and learning will differ but all institutions must achieve outcomes consistent with the requirements of the national Standards

- 6. National Teaching and Learning Standards should provide information that can be used by institutions for monitoring and accountability and to assist with their own quality improvement.*

Principle 6 again refers to the importance of the Standards and institutional practice interacting.

The reference to institutions using the Standards for 'monitoring and accountability' could mean internal arrangements within the institution but equally points to the potential Government use of the Standards for external accountability and as a basis for funding. It therefore identifies a further influencing factor on the Standards' development: how universities' learning and teaching performance is judged as the basis for allocation of performance funding. This requires an effective dialogue of institutions and TEQSA with DEEWR to ensure an interactive parallel development of Standards and related performance measures.

There is a clear alignment between the Teaching Standards and the student experience measures (including the proposed University experience survey) and the Learning Standards and the proposed use of the CLA or similar instrument in the performance assessment arrangements.

Further, the make-up of the Standards should be such as to inhibit their potential use in crude ranking exercises by media and other public parties.

7. *Experts will play a key role in the development and application of Teaching and Learning Standards*

IRU strongly endorses the importance of expert advice in the Standards' development and judgement in their application. The first aspect of this is that effective Teaching and Learning Standards cannot be reduced to simply yes/no answers and quantitative data and cannot be used effectively except by those with sufficient expertise to interpret them. The second aspect is for there to be clarity about the broad range of expertise potentially involved. Figure 1 implies that experts will come from institutions, professional bodies, and discipline communities, three overlapping but distinctive groups.

Inevitably, there will be differing view amongst groups of experts and there will need to be processes to accommodate differences and find a consensus position. For example, as is experienced with accreditation by professional bodies, there is a tendency for expertise to be based around the status quo. Curriculum or assessment innovations are frequently criticised for 'dumbing down' compared with existing practice, irrespective of their merits in addressing deficiencies within that current practice.

International and domestic developments

Discussion points 4 and 5 seek feedback on the summary of international and domestic developments of relevance to the coming framing for Teaching and Learning Standards.

Overall the IRU agrees that the summary provides a useful outline of developments. The following points could be considered in updating the analysis:

- the abolition of the Australian Learning and Teaching Council is important for removing one important source for collaborative national action and prestige in support of learning and teaching. Its role to date should be included since the ALTC has had a significant impact in legitimising teaching excellence as an aspiration and expectation among academic staff and encouraging academics to build careers around teaching and learning; and
- there should be a stronger reference to the literature concerning research and scholarship of teaching and learning. The literature should be the basis for deciding the aspects of teaching and learning that the Standards address.

Steps towards Australian Teaching and Learning Standards

Issue 6: the relationship among parties and documents to the Standards

Issue 6 formally asks whether Figure 1 is a useful architecture of the relationships for the development of a Standards framework. On that precise point the IRU answer is 'no'. The discussion at the TEQSA Forum at the Gold Coast on 4 July 2011 showed that the Figure caused more confusion than clarity among participants. This is in contrast to the outline of the various relationships in p16 which provides a good basis for considering the issues.

Figure 1 requires reworking to make clearer the relationships intended between the Standards, the university internal and cross university quality Standards mechanisms and the various professional and other stakeholder interests and how these each relate to expert peer assessment.

Issue 7: the structure of Standards statements

The tripartite structure of The Standard, statements that elucidate the intent of the Standard, and Reference points that indicate the evidence that would support analysis provides a viable structure to begin development of the Standards. As with many aspects of their development it is clearer how the structure could apply to the Teaching Standards than to the Learning Standards.

Assessing the Standards

Issues 8 and 9: use of tests, instruments and other measures

The Learning Standards are much less clearly perceived by those participating in discussions. The focus on evidence of the actual learning of students, rather than the means by which university develop student learning, suggests that tests and similar measures would be one means to assessing the Standards. This will not be sufficient to provide an effective assessment of achievement against Learning Standards – assessment using peer review will still be essential to provide sufficient interpretation of the outcomes shown. Further, IRU retains a significant concern that standardised, written tests if they become predictable will inevitably lead to teaching to the test, directing energy towards that end away from developing broader generic skills such as teamwork and problem solving.

Issue 10: the use of expert review

If the quality framework is to provide an effective assessment of students' teaching and learning it must be based on qualitative judgements by capable assessors, presented in ways that have meaning to students and other interested parties. The current development of cross institutional projects targeting this could provide a viable basis for collecting much relevant information that would reduce the need for TEQSA specific assessments. Where TEQSA does carry through an assessment against the Standards it needs to rely extensively on the judgement of its reviewers over pre-set quantitative approaches.

Conclusion

The Discussion Paper is an important starting point for the creation of Teaching and Learning Standards that will define essential aspects of teaching and learning that all higher education providers should achieve and provide a framework against which higher education providers can demonstrate their level of achievement.

There remains much work to do to establish an agreed framework for the Standards. Two issues in particular should be points of focus for the next stages of development:

- development of the Standards themselves needs to work iteratively with developing understanding of how they will be set, used and monitored as part of the new quality arrangements while ensuring that universities continue to exercise their responsibility to develop the way in which higher education is provided; and
- continued discussion about how the Standards will meet the public requirements for confidence in higher education teaching and learning within and across institutions.