

Proposed Higher Education Standards Framework: IRU Response

The IRU endorses the Higher Education Standards Framework, which the Higher Education Standards Panel released on 23 April 2014 for comment, with proposals for some few amendments to achieve full clarity.

The Framework provides a significant reworking of the standards to be used to assess suitability for registration as a higher education provider and for registration of higher education qualifications. The Framework is well pitched, setting out the outcomes expected without unnecessarily dictating how they should be achieved or explicitly or implicitly presuming current approaches to higher education delivery.

The following sections:

- a) outline suggested amendments to particular standards to improve achievement of the Panel's goals in developing the Framework;
- b) supports the proposed Part C, application of the standards for regulatory purposes;
- c) discusses the relationship of the Framework to the requirements of the Education Services for Overseas Students Act; and
- d) considers the future need for Provider Standards.

A. Individual Standards with weaknesses in wording

1.1 Admission

1. Admissions policies, requirements and procedures are documented, are applied fairly and consistently, and ensure that admitted students have the academic preparation and skills³ needed to participate in their intended study and achieve the expected learning outcomes.

Footnote 3: 'academic preparation and skills' includes proficiency in English.

Reference to English language proficiency, which would read better as 'language of instruction' is an unnecessarily specific inclusion. The Standard's specification of 'academic preparation and skills' is sufficient.

1.5 Learning Outcomes and Assessment

6. Assessment of major assessable research outputs for higher degrees by research incorporates external assessment by:

- a. for doctoral degrees, at least two independent experts with international standing in the field of research who are external to the higher education provider, are competent to undertake the assessment and do not have a conflict of interest, and
- b. for masters degrees, at least two independent experts who are competent to undertake the assessment and do not have a conflict of interest, at least one of whom is external to the higher education provider and has international standing in the field of research.

This standard reflects current practice but is overly prescriptive in making that practice a requirement.

2.1 Facilities

The Heading does not well represent points 2 and 3 of the specific standards

3.1 Course design

5. Where professional accreditation of a [course of study](#) is required for graduates to be eligible to practise, the course of study is accredited and continues to be accredited by the relevant professional body.

Clarity is needed for 'required' linking it to legislative requirements not the expectations of a professional body. This could be done through adding a foot note or amending to read:

Where professional accreditation of a [course of study](#) is a legislative requirement for graduates to be eligible to practise, the course of study is accredited and continues to be accredited by the relevant professional body.

3.3 Learning Resources and Education Support

1. The learning resources that are specified or recommended for a course of study relate directly to the learning outcomes, are up to date and, where supplied as part of a course of study, are accessible when needed by students.

While the standard addresses an important issue the wording "when needed" is open to broad interpretation. This is better replaced with "timely" as is used in the following standard.

4.1 Research

Reference Points

ii. Excellence in Research for Australia

As argued in the IRU's submission to Call for Comment Number 2, the Excellence in Research for Australia (ERA) initiative is not a suitable reference point. ERA is an assessment of, essentially, the quality of research outputs produced by an institution's researcher cohort over a past period. It does not measure, or reflect on, the capacity of an institution to undertake research in terms of developing a research policy framework (4.1.1), ensuring the appropriate qualifications and experience of researchers (4.1.2) or maintaining a management information system (4.1.3).

B. Part C, application of the standards for regulatory purposes

Through the work of the Higher Education Standards Panel the number of specific standards has been reduced to 93 across 7 broad areas. This is fewer than the current standards but still a considerable number. One weakness of the current registration process standards has been the determination to assess each separate standard in its own right with limited regard to the overall operations of the provider and with insufficient heed to the principles of regulation.

The Explanatory Note in Relation to Part C is an important outline of how the Tertiary Education Quality and Standards Agency should use the standards in exercising its powers to register providers, accredit courses, approve self-accreditation powers, and monitor provision once registration and accreditation has been approved.

C. The Framework and the Education Services for Overseas Students Act

The Higher Education Standards Panel has provided a useful guide to the relationship of the standards within the Framework to the requirements of the Education Services for Overseas Students Act (ESOS). It demonstrates that if the Framework is approved many parts of the ESOS National Code would be redundant for application to higher education providers.

ESOS was created at a time when there were few if any explicit protections for higher education students. With the creation of the Standards Framework and other quality arrangements it is time to integrate the provisions for international and domestic students such that there is a common set of expectations for all students. Specific additional protections or requirements for international students should be used only where clearly needed for that set of students only.

D. Provider Categories

The Panel has indicated that it has yet to review the specifications for various types of higher education providers.

It is questionable that multiple defined provider categories are needed in a future world where higher education providers are to respond differentially to market opportunities. Prescriptive categories can only constrain potential future approaches to higher education delivery.

The then Australian Vice-Chancellors' Committee argued against the need for categories in *Quality and Diversity: A framework for approving higher education providers* in May 2005 when the current arrangements were being developed. That only one of the current defined provider types, 'university', has more than a few members is indicative that the current typology has had little practical use.

There is an important issue about ensuring the best use of the university title in Australia where it means a substantial combination of teaching, research and support for community. Other providers are different and intentionally so. They should not undermine their distinctiveness by taking on the 'university' title but use the array of institutional titles now in place to establish themselves as credible funded higher education options. That will allow clarity about the different options available to students and ensure that people in selecting a provider understand the choice they are making. Should any current university choose to pull back from key elements of a 'university' as an active part of its mission it should also give up the university title.

Clarity of use for the university title does not require a set of provider categories. Rather it can be supported through a clear definition of the key elements for use of 'university'. Should other titles come to have such distinctive meaning embracing a notable set of providers then they too could be defined and limited in use.

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