Dear Higher Education Standards Panel,

The University of Sydney is pleased to provide some initial thoughts in response to the Developing a Framework for Teaching and Learning Standards in Australian Higher Education and the Role of TEQSA Discussion Paper, released for comment by the Interim TEQSA Commission in June 2011. Our comments are intended to complement the submission provided by the Group of Eight universities, which we endorse.

We recognise that it will take some time and considerable effort to develop the various standards that are required before TEQSA can perform its regulatory and quality assurance functions in accordance with the legislation. We caution against rushing to finalise the threshold standards and the development of the quality standards, and trust that the level of engagement and cooperation that was evident towards the end of the TEQSA legislation development process will continue as the detailed work on the standards and their implementation proceeds.

We are keen to be part of a national discussion, led by the Standards Panel, about the development of an appropriate standards framework. We see such dialogue as vital to ensuring that the framework is developed and applied in ways that are practical and which have the broad support of providers, disciplines, professions, employers and students. We are wary, however, that the scale of the administrative and compliance requirements of the new regulatory arrangements could be significant, and that the extent of this burden will depend largely on the design of the standards and decisions taken by TEQSA on how the standards will be monitored and applied on the ground.

In order to have our support the Higher Education Standards Framework will need to: safeguard institutional autonomy; encourage diversity, innovation and improvement; recognise the linkages between teaching, research training and research; be internationally referenced and open to change; be proportional to risk and benefits achieved; and be implementable in ways that are cost effective and realistic in terms of the funding environment in which Australian higher education providers operate.

Our attached submission addresses some of the key issues that we see arising from the Discussion Paper. We look forward to engaging with the Panel and other stakeholders in order to deliver a standards framework that enables the Government’s objectives to be met, but which is also relevant to all providers, serves to enhance student learning, and which can be implemented efficiently and cost effectively.

Yours sincerely

(Signature removed for electronic distribution)

Professor Derrick Armstrong
Deputy Vice-Chancellor, Education and Registrar
Executive summary
The University of Sydney is keen to be part of the process of delivering an integrated Higher Education Standards Framework that enables TEQSA to fulfil its legislated regulatory and quality assurance roles. The Discussion Paper has been helpful in stimulating thinking and discussion, particularly around the relationship between the threshold standards and the quality standards, as well as about operational aspects of the standards framework. This process of consultation should assist the Standards Panel and TEQSA to find ways to deliver the Government’s objectives for improved regulation and quality assurance. We hope that it will also ensure that, both in its design and application, the framework is relevant to all providers and is able to be implemented cost-effectively and efficiently.

Safeguarding institutional autonomy
The Discussion Paper includes assurances about the importance of TEQSA respecting institutional autonomy in its approach to quality assurance for teaching and learning. Nevertheless, the proposed pursuit of a compliance-based and minimum standards model does not sit well with these assurances. Responsibility for all aspects of academic standards, including standard setting, is an essential part of the autonomy and self-accrediting status of universities. The self-accrediting standing of Australian universities is now recognised explicitly in the TEQSA legislation, yet without the power to set and manage their academic standards, universities effectively have no autonomy or powers of self-accreditation. TEQSA should establish clear and measurable ‘process’ or ‘delivery’ threshold standards for registration, but beyond these institutions should set their standards in line with their individual goals and aspirations. TEQSA’s key roles then are to ensure that institutions meet or exceed the relevant threshold standards and, through periodic quality reviews, to comment on the effectiveness and appropriateness of their performance, in order to encouraging self-reflection and continuous improvement.

Focusing on outcomes
While the proposed splitting of teaching and learning standards into ‘process’ and ‘outcome’ standards is conceptually sensible, we suggest that the focus of TEQSA’s approach to quality assurance should be on generic graduate attributes and student learning outcomes at the discipline level. The teaching standards should be dealt with at the level of the institution and align closely with (or be included within) the provider registration and category standards. The teaching standards should be viewed as the teaching ‘process’ or ‘delivery’ elements of relevant threshold standards, the existence of which providers must demonstrate when being considered by TEQSA for registration or re-registration. Institutions should also be able to demonstrate alignment between their intended graduate attributes and learning outcomes, and their chosen processes.

Addressing research and research training
Just as there are interdependencies between the teaching and learning standards and the provider registration and category standards, so there are critical links between the teaching and learning standards and the proposed research standards. We have suggested that it is vital that thought be given to the appropriate placement of higher degree by research training activities within the standards framework, as well as to the question of how to ensure that the teaching and learning standards accommodate institutions that have research-engaged teaching at the core of their missions. We have proposed a way that these issues might be addressed in the design and implementation of the standards.

Linking standards and funding
Discussions about setting minimum requirements of provision and resourcing cannot occur in isolation from considerations of funding. Funding must be adequate for the purpose and must also recognise that different institutions have different costs structures because of their missions, approaches to education and other factors. Moreover, there are limits in the extent to which teaching quality and student learning outcomes can be improved in the absence of sufficient resources, and to which institutions can achieve efficiencies before impacting on quality. At present, except for some loadings for regional providers and other specified purposes, base funding for domestic coursework students is provided on the same basis to all providers, regardless of whether they are small teaching only enterprises or comprehensive research-intensive universities. Similarly,
appears that the objective is for the minimum teaching and learning standards to apply to all providers. We suggest ways that these issues could be addressed in the context of the Base Funding Review.

**Applying international standards and benchmarks**

We note that while the Excellence in Research for Australia (ERA) initiative seeks to assess the quality of Australian university research compared to international benchmarks, this does not yet appear to be the case for the development of the teaching and learning standards. With higher education now a global industry it will be important to ensure that all of the quality standards apply international benchmarks. We view the discipline specific learning objectives approach undertaken by the Tuning process as a particularly valuable reference for this purpose.

**Monitoring, measurement and communication**

Arguably the most challenging task facing the Standards Panel and TEQSA is striking the right balance between the need for robust and comparable information about institutional standards and student performance, and the administrative burden placed on providers. We suggest that the Panel should establish an expert working group to advise it on these highly complex matters, with work on the development of new indicators or processes delayed until agreement is reached about what it is that TEQSA will be monitoring and measuring. We draw the Panel’s attention to the Go8 Quality Verification System (QVS) pilot and offer our support for the Australian Higher Education Graduate Statement (AHGS) as a means of contextualising graduates’ qualifications and their levels of achievement.

1. **Ensuring the Standards Framework is relevant for all providers**

Responsibility for setting, monitoring, assessing and assuring standards of academic quality lies at the core of any university’s autonomy and self-accrediting status. It is from the independent exercise of this responsibility, according to internationally accepted academic norms and ongoing engagement with the professions, that university qualifications derive their legitimacy. Without the power to set and manage their academic standards, universities effectively have no autonomy or power of self-accreditation.

The Discussion Paper gives some emphasis to the importance of TEQSA respecting institutional autonomy (p.6), but at the same time clearly contemplates the development of minimum teaching and learning quality standards. As outlined, these are be used as the basis for TEQSA’s approach to both its regulatory and quality assurance roles, as well as being the key reference points for ongoing performance measurement, benchmarking and information provision. The Discussion Paper also notes that a ‘standards approach inevitably raises tension between desirable diversity and the need for comparability and common points of reference’ (p.4). Resolving this tension in a workable way will be critical if a minimum standards framework is to be relevant to, and accepted by, all higher education providers.

We suggest that any minimum teaching standards should be embedded in the threshold standards and be used primarily for registration purposes, with TEQSA then focusing its quality assurance role predominantly on the assessment of student learning outcomes. If the setting of national minimum teaching standards is to be fundamental to the design of the framework, however, we strongly suggest that providers be given the option of either formally adopting the minimum standards prescribed by the Minister, and being both regulated and quality assured against these, or of setting their own standards (above the minimum) against which they would be quality assured and performance assessed, but not regulated. If the framework must include minimum teaching delivery standards separate from the threshold standards, this is one way whereby TEQSA’s powers of regulation could be applied consistently to all providers, while at the same time recognising and encouraging diversity through a differentiated ‘mission-specific’ approach to quality assurance.

2. **The relationship between the threshold standards and the quality standards**

There appear to be many similarities and overlaps between the scope and purposes of the teaching standards as conceived in the Discussion Paper and the draft provider registration standards, which form a core element of the threshold standards. For example, the Discussion Paper describes the teaching standards as the dimensions that ‘establish the pre-conditions for the achievement of learning and educational outcomes fit for the awarding of a higher education qualification’ in areas such as ‘curriculum design, the quality of teaching, student learning support, and infrastructure’ (p.3), while these issues are also covered in the draft registration standards. We note also that a key objective behind the creation of a
national provider registration and accreditation framework, is to ensure that all providers meet appropriate threshold standards, before being able to award recognised Australian qualifications.

The rationale for the approach proposed in the Discussion Paper for the teaching standards appears to be that the draft provider registration standards are intended to apply at the level of the institution as a whole, whereas the teaching standards should specify the minimum ‘process’ or ‘delivery’ standards that are acceptable at the level of the discipline or course. The expectation appears to be that providers, as part of TEQSA’s re-registration and quality assurance processes will need to demonstrate the achievement of the proposed teaching standards at the discipline or course level. We note, however, that the example of a possible teaching standard category provided in the Discussion Paper is framed at the institutional level (p.18), while all of the ALTC’s work on learning outcome standards has occurred at the level of the discipline.

We question both the desirability and feasibility of the proposed setting and enforcement of detailed minimum teaching standards at the level of the discipline or course, outside of the threshold standards. It would be preferable to ensure that all key teaching standard categories are captured at a high level in the provider registration or category standards, with these threshold standards applied at the institution level only. Providers would then be required to demonstrate the delivery to at least the minimum teaching ‘process’ standards across relevant areas of activity, as part of the re-registration and/or quality assurance processes. They would also be required to demonstrate alignment between their intended learning outcomes and chosen teaching processes as part of the quality assurance process. This would leave greater room for innovation at the disciplinary level, and serve to encourage the disciplines to focus their efforts on specifying learning outcomes and measurement.

While the ALTC’s academic standards project has been very worthwhile as a means of facilitating dialogue among stakeholders about learning outcomes from disciplinary perspectives, it has been resource and time intensive. Moreover, its success to date is due to a focus on specifying learning outcomes rather than processes, and having been supported by significant direct funding and other support provided through the ALTC. We feel it is important to note also that each of the disciplinary standards statements from the pilots acknowledged the importance of curriculum and pedagogical diversity both between and within institutions, and stressed that the statements did not seek to prescribe any particular approaches to teaching, resourcing, curriculum design, student admissions, support and assessment.

The Discussion Paper states that ‘student achievement and attainment is the ultimate goal of higher education’ (p.4) and that ‘TEQSA is developing learning standards because there is consensus that Australia must be confident that all graduates meet national minimum levels of attainment appropriate for the field or discipline in which they have studied, and appropriate for the level of the award they are granted’ (p.5). Moreover, the Bradley Review itself reported that the various AUQA audit cycles had found that university quality assurance processes were ‘generally effective’, with the most recent cycle suggesting that institutions take the management of academic standards ‘very seriously’ (Bradley Review, p.130).

For reasons such as these, we feel strongly that, except perhaps for new providers, the focus of TEQSA’s approach to quality assurance should be on the learning (or outcomes) element of the standard at the discipline level, with the teaching (process) element dealt with at the institutional level, as part of, or directly linked to, the threshold standards. As the Discussion Paper notes, it takes time for learning outcomes to become measurable and comparable, and monitoring educational processes can be of value in a provider’s start-up phase (p.4).

3. The place of research and research training in the learning and teaching standards

The absence of any mention in the Discussion Paper of the relationships between research and research training in the proposed conception of the teaching and learning standards appears to be a significant omission. The Discussion Paper notes that there are points of intersection and relationships between the teaching and learning standards and the provider and qualification standards, as well as with the provider course accreditation standards (p.5). No such reference is made to the relationship between the teaching and learning standards and the research standard, while it remains unclear where the whole area of activity, commonly described as ‘research training’, is to be covered in the standards framework.
There is a strong case for including research training standards as a category within the teaching and learning standards, even though core funding for research training now comes from the Government’s science and innovation portfolio, rather than the education portfolio. While higher degree by research students make important contributions to a university’s research effort, they are students nevertheless, and the delivery of their training and assessment of their learning outcomes should be considered as part of the teaching and learning standards.

We appreciate that much of the impetus for the creation of TEQSA and the national system of regulation and quality assurance arose from the Government’s desire to safeguard quality in an expanded ‘demand-driven’ system of undergraduate places. We further appreciate that the new regulatory arrangements need to accommodate higher education providers which range from small non-university teaching only organisations, to comprehensive research-intensive universities. Given this, it is perhaps not surprising that thinking to date about teaching and learning standards has tended to focus largely on issues around the provision of undergraduate and other coursework programs, with apparently less attention given to the quality of higher degree by research programs, or to the critical importance of the relationship between teaching and research in some institutions.

At this University the notions of ‘engaged enquiry’ and ‘research enriched’ learning lie at the heart of our mission and pedagogical approach at all levels of education. We seek to embed discovery-based learning in all curricula, and to provide students with opportunities for research experiences appropriate to their disciplines and level of study. In so doing we introduce students to research and research methodology early in their studies, seek to identify students with an interest in and capacity for research, and provide clear pathways by which they can pursue their passions. We also seek to provide coordinated faculty, divisional and University-wide programs for researcher induction, and for research training, mentoring and professional development at all career stages. With research so integral to our teaching (and teaching also influencing our research) we cannot conceive of teaching standards being relevant to us unless they address the place of research in our teaching, just as we would find it difficult to conceive of research standards that did not address the issue of how our teaching informs our research.

We feel that this dilemma adds weight to our suggestion in Section 1 above that if the framework must be based on uniform national minimum teaching standards, then institutions should be given the option of either adopting these, or of setting their own standards above the minimum, against which they would be quality assured and assessed, but not regulated. This would allow for minimum teaching standards to be set for teaching only and teaching/research providers alike which do not address issues of research in teaching or research training, but which would also enable those providers that do provide research training and/or embed research in their approach to undergraduate teaching, to specify these additional standards and have their performance against these extra standards assessed.

4. The relationship between the quality standards and funding

Just as we suggest that thinking about teaching and learning standards would benefit from broadening the discussion to encompass interdependencies with research and research training, so we believe that these discussions need to include considerations of funding. By way of example, if the proposed national minimum teaching standards are to impose requirements on providers that come with costs, then it follows that the levels of funding providers receive must be sufficient to enable them to deliver all of the required services at the required standard of quality.

In the context of the Base Funding Review, the sector has argued that university base funding is provided to support the direct and indirect costs of sustaining the educational fabric of institutions. This includes the direct and indirect costs associated with their core activities of teaching, scholarship and research. Clarifying the purpose of base funding is therefore viewed as fundamental to the development of the teaching and learning standards because, at present, all higher education providers that receive Commonwealth Supported Places (CSPs) are funded on the same basis, regardless of whether they are teaching only or research-intensive. If base funding includes a ‘base research’ component, which the sector now broadly agrees that it does, then this draws into question the equity and sustainability of the current funding arrangements in a demand-driven system. If the minimum teaching standards do not specify, for example, that providers must undertake research or research training, this would provide a basis for introducing funding arrangements which align funding rates to the activity profiles of different provider types.
5. Monitoring, measuring and communicating the quality of learning outcomes

The Discussion Paper gives a good overview of developments in Australia and overseas in the articulation, monitoring and measurement of teaching and learning standards. For the reasons discussed above, we believe that the focus should be on the measurement of student learning outcomes and standards, rather than teaching standards. Learning outcomes state the attributes of our graduates and what they should be able to do by the end of their course, whereas learning standards state whether these outcomes are good enough to meet the goals of the institution, and the expectations of the discipline, profession or community. There are essentially five ways of measuring the standards of student learning outcomes: student perceptions (surveys); direct performance measurement (generic skills and discipline specific tests); external verification (peer review); graduate destinations (surveys); and employer perceptions (surveys). As the paper notes, mechanisms of the different types have value for the purposes they were designed, but also come with varying limitations, and become problematic when used for purposes other than those they were originally designed to address.

We are therefore disappointed that the Government has pressed ahead with the development of a new student survey, the University Experience Survey (UES) and a Collegiate Learning Assessment (CLA) model for the Australian context. We feel that it would be sensible for the Standards Panel to request that this work be postponed until clarity can be provided about the learning outcomes that will be measured as part of the TEQSA standards framework. It makes no sense to have new generic tools under development, with the intention of driving teaching performance funding, when the expert consensus may be that the UES and CLA are of limited use for measuring either teaching quality or student learning outcomes in an Australian context. Here we note that the TEQSA legislation enables the Standards Panel to establish advisory committees to assist it in performing any of its functions. We urge the Panel to establish an expert group as soon as possible to provide it with advice on how best to proceed with quality measurement in terms of design, implementation and resourcing.

To date, the discourse around the development of the teaching and learning standards appears to have been focused largely on domestic standards and benchmarks. The contrast with the approach taken recently to the assessment of the quality of Australian university research through the ERA process is quite stark. We understand that the design of TEQSA research standards is likely to be heavily influenced by the globally-referenced approach to measuring research quality used by the ERA. If this is the case, then it would be quite odd if the teaching and learning standards were set without a similar reference to international benchmarks. Just as Australian university research competes in a global market for knowledge, so our institutions compete increasingly in global market for students and staff, while increasing numbers of our graduates are destined for international careers. All of the TEQSA quality standards should be set with reference to world standards, with performance measurement also taking account of international comparators. In this context we view the discipline specific learning objectives approach undertaken as part of the Tuning process as a particularly valuable benchmarking exercise.

One potentially significant development in the area of quality assurance and measurement that was not mentioned in the Discussion Paper is the external Quality Verification System (QVS) that has been developed by the Go8 universities and which is being piloted in 2011. More details about this scheme are provided in the Go8 submission, but it is essentially a process of external, discipline-led, academic peer review of final year undergraduate student outcomes in a selection of undergraduate program across all eight universities. The scheme aims to demonstrate the appropriateness of the standards of learning outcomes, as well as grades awarded in each of the programs at each of the eight universities. While the QVS is still in its pilot phase, the aim is to establish a five year cycle of external verification of academic standards in all disciplines. We would never suggest that the QVS model should be adopted for all providers. We view it, however, as the type of relatively light touch external peer review mechanism, developed by institutions in collaboration, that we feel is most likely to provide meaningful insights about the learning outcomes and academic standards achieved by students graduating from different institutions. It will also contribute to ongoing self reflection and improvement within universities at the level of the discipline and course.

We also see value in the continued development and refinement of the Australian Higher Education Graduate Statement (AHEGS) as a means of contextualising graduates’ qualifications and their levels of achievement.