

The Accountability for Quality Agenda in Higher Education

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Making sense of a new agenda in higher education policy

Preface for the dialogue with the Oxford University Centre for Educational Assessment

Governments in many countries exert pressures on universities to be more accountable for the results they manage to achieve with the resources available to them. A recently added twist, ironically within the context of falling government investment and rising student demand, is that governments are intruding into areas which have long been regarded as prerogatives of autonomous universities.

The accompanying paper has been prepared as a draft to focus discussion between Australian and British policy analysts in the first instance, and later with US counterparts. The main reason for a bilateral discussion initially is that there are three significant factors in common between the Australian and British higher education contexts.

First, there are commonalities in the structure and culture of universities in the UK and Australia.

Universities in both countries are primarily public institutions, which are assisted by the nation state through normative financing mechanisms, but rely increasingly on self-earned income from commercial operations and competitive sources. They have traditionally enjoyed, by comparison with public universities in continental Europe, the Americas and Asia, a relatively high level of autonomy, notably in respect of governance, revenue and expenditure, student admissions, academic and general staff appointments, curriculum, teaching, research, student assessment, and the award of qualifications.

Public universities in North America have many similar characteristics but they function within mixed public-private systems and where states or provinces, as distinct from national government, have the major financing responsibilities for teaching-related purposes.²

The Australian degree structure is (with some recent institution-specific exceptions) closer to British (in particular the Scottish undergraduate specialisation model) than North American or European models.

There are also similarities in the skills-based approach to vocational education and training, as distinct from the broader capability approach of the German and other European VET systems.

Additionally, both Australia and Britain have reduced supply diversity by collapsing former polytechnics into the university model, whereas structural differentiation continues to be a feature of European systems while there is great diversity among North American universities as well as between them and community colleges.

Second, in both countries there has been a longstanding convention of parity of esteem of higher education awards.

This convention is underpinned by normative supply-side funding, whereby all courses in similar disciplines are funded at the same rate across all institutions at least for domestic undergraduate and research higher degree students. The convention extends to equivalence in expectations of the capabilities of graduates of different institutions.

Both countries share the ambiguities and anomalies arising from the legacy policies of the elite era

2. In Australia, the federal government has assumed funding responsibility for higher education.

which continue to operate in the context of diversification of post-mass higher education supply and demand.

Third, in both countries there has been an increasing interest on the part of government in matters of higher education quality assurance and research quality verification. Indeed there are some shared policy and program features, reflecting regular interactions among policy makers and academic and professional staff between the two countries.

In continental Europe a strong rationale for focusing on higher education outputs and results has been the change in the approach to system steering from direct to indirect mechanisms, with greater institutional discretion over the use of resources.

In Australia and Britain the agenda is driven by other forces, viz. the enlargement and diversification of higher education demand and supply, and the changing nature of labour markets.

In Australia, the agenda is being driven by a number of different bodies and, apparently, from a number of different points of view. It is not clear whether the dots are joined between 'strengthening' the national qualifications framework and its descriptors, standards references, provider accreditation and re-accreditation, and academic performance reporting. There is no single authority with whom to converse.

In Britain, the new Coalition Government has indicated an interest in revisiting the higher education policy landscape, with an initial focus on graduate employability but its longer-term approach, in the context of fiscal parsimony, has yet to be clarified.

In both countries, the language as well as the agenda is unclear. Why is this agenda on the table? Who has put it there? What is it intended to achieve? How is it to be implemented? What actual impact might it have, positively and negatively?

This paper is intended to help make sense of what is happening and inform public debate to promote balanced outcomes.

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Introduction

Concurrently across several countries there is an interest in accounting for the quality of higher education³ through the exploration of a “standards-based approach” and a “focus on outcomes”. This relatively new “accountability for quality agenda” is ambitious and ambiguous. It brings together a concern for relevance, performance and transparency. It represents both a continuation of previous developments and a departure from some prior core tenets, in seeking to address changes in the role and character of higher education. It is being pursued primarily by governments and in ways that cut across the conventional responsibilities of higher education institutions themselves to validate the educational qualifications they award. Thus it involves tensions between political and professional perspectives, in an area where “by and large, academic standards are a matter of professional trust” (James, 2003) but the bases of trust have been eroded (van Vught et al., 2010).

This paper explores the forces driving this agenda, the range of public policy purposes related to it, and the options for universities in responding to it in ways that do not demean higher education and safeguard their substantive and operational autonomies.

The paper has particular regard to the Australian Government’s 2009 response to the Report of the Review of Australian Higher Education and the subsequent policy debate.⁴ It considers the Australian proposals for change in the context of policy directions identified by OECD Education Ministers at their 2006 meeting in Athens, the 2006 report of the Spellings Commission in the USA,⁵ and the 2009 report of the UK House of Commons Select Committee on Innovation, Universities, Science and Skills.⁶

The paper is organised into five parts. The first part outlines the dimensions of the emerging accountability for quality agenda: its scope and apparent purposes. The second part considers the declared and underlying drivers of policy change. The third part looks at various manifestations of the agenda in Europe, Britain, the USA and Australia. Part 4 discusses definitions of key concepts and debates about the issues, with reference to the scholarly literature. The final part explores ways forward by establishing common ground and reconciling differences between the higher education sector and government in designing an appropriate and workable framework for the advancement of quality in higher education.

This relatively new “accountability for quality agenda” is ambitious and ambiguous. It brings together a concern for relevance, performance and transparency.

3. Higher Education in this paper refers to all programs leading to diploma and degree qualifications at ISCED 5B, 5A and 6, regardless of the institutions or providers that offer them. There is contested ground between the Vocational Education and Training, and Higher Education sectors at the diploma levels.

4. Australian Government (2009), *Transforming Australia’s Higher Education System*. Canberra.

5. US Department of Education (2006). *A test of leadership: Charting the future of American higher*. (Report of the Commission appointed by Secretary of Education Margaret Spellings). Washington. DC.

6. House of Commons, (2009) *Students and universities*, report of the Select Committee for Innovation, Universities, Science and Skills Committee. London.

1. Dimensions of the Accountability for Quality Agenda

This part describes existing frameworks and arrangements for higher education quality validation in several countries, the range of reforms being proposed, and the given rationales for the reforms. It explores the specific and shared circumstances giving rise to the need for and direction of reform. It also explores the scope for common ground between governments and higher education institutions in responding to new challenges.

1.1 The current architecture for quality assurance in higher education

Over the last decade, and in some cases earlier, many countries have put in place quite comprehensive arrangements for quality assurance in higher education.

In the US, higher education quality is addressed by three main means: accreditation; program review; and assessment. Accreditation is a function of various non-governmental accrediting associations, each of which is responsible for establishing the criteria and procedures for evaluating the quality of educational institutions or programs. Accreditation serves to validate that an institution or program meets minimum quality standards, but “does not provide an indication of the level of program quality relative to other programs” (Gibeling, 2010). Program review is an internal function, (although as well as internal reviewers it may involve external reviewers from peer institutions), undertaken periodically every 5-10 years, and capturing a wide range of qualitative and quantitative indicators, designed to provide feedback for program improvement. Program assessment is a function of public organisations and agencies, each of which may require reporting against a specified set of indicators (typically progression rates and times, completion rates, and graduate destinations). Assessment generally “focuses on outcomes, involves a narrower set of measures (than program review) and is usually continuous rather than periodic” (Gibeling, 2010). Accreditation, program review and assessment can be seen to provide distinctive but complementary perspectives:

“Done properly, program review provides a perspective on the future, not a statement of the present or a description of the past. In contrast, program assessment tends to focus on past success in achieving specific outcomes and accreditation generally represents an evaluation of the current state of a program or institution. Thus the three types of evaluation provide distinct perspectives and add value in different ways. Furthermore, this difference in perspectives means that one form of evaluation cannot easily substitute for another” (Gibeling, 2010).

Box 1 outlines the main features of the US Accreditation and Quality Assurance System (Eaton, 2008). In Australian terminology, ‘accreditation’ means licensing of providers and registration of professional qualifications. Recognition is the term given to the process of assuring the quality of the accrediting bodies. The US concept of ‘quality assurance’ is much wider than the Australian notion of quality auditing. Accreditation in the US is about both *quality assurance*: assuring threshold quality in higher education; and *quality improvement*: assuring that institutions and programs have processes to try to do what they do better (Eaton, 2008). The quality improvement agenda focuses on the assessment criteria that each institution or program sets for itself. That is, US accreditation and quality assurance have a standards-referenced dimension and a fitness-to-mission dimension. The US does not have a national qualifications framework.

In 2008 there were 19 accrediting bodies for the accreditation of institutions and 61 bodies for the accreditation of programs (e.g. in law, medicine, engineering and health professions). The accrediting bodies are autonomous, non-governmental, not-for-profit organisations funded mainly from annual subscriptions from institutions and programs. The accrediting bodies develop minimum standards that must be met in order to be accredited. Institutions and programs undertake self studies based on those standards, and then are subject to review by peers in the profession, including through site visits and team reports. Accrediting bodies make standards-referenced judgements through their decision-making commissions and award or do not award accredited status. Institutions and programs undergo periodic review to maintain accredited status, which is required for access to federal and state funding (Eaton, 2008).

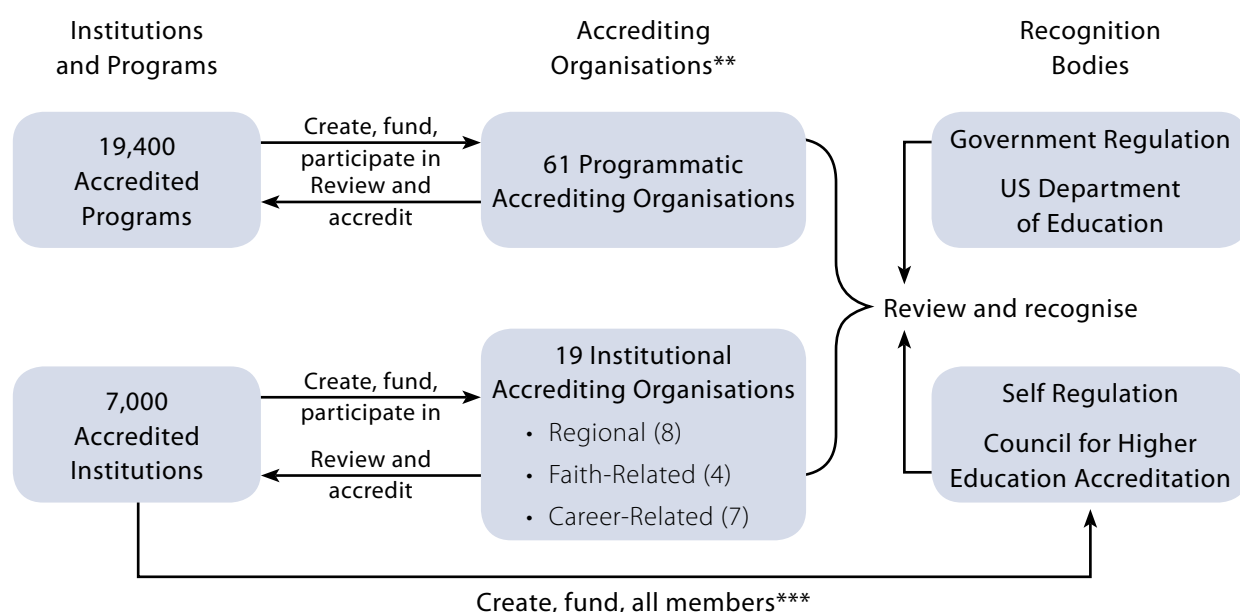
...accreditation and quality assurance have a standards-referenced dimension and a fitness-to-mission dimension. The US does not have a national qualifications framework.

Importantly, US Accreditation and Recognition are grounded in a set of values:

- That **higher education institutions** have primary responsibility for academic quality: They are the leaders and the primary sources of authority in academic matters.
- That **institutional mission** is central to all judgements of academic quality.
- That **institutional autonomy** is essential to sustaining and enhancing academic quality.
- That the higher education enterprise—and the society—thrives on **decentralisation and diversity** of institutional purpose and mission.
- That **academic freedom** flourishes only in an environment of academic leadership of institutions (Eaton, 2008).

Box 1. Accreditation and recognition in the US

Relationship among Institutions Accredited by Recognised Accrediting Organisations, Recognised Accrediting Organisations and Recognition Bodies*



*2007 Council for Higher Education Accreditation (CHEA) Almanac of External Quality Review.

**Some accrediting organisations are recognised only by CHEA, some only by the US Department of Education, some by both.

***Not all accrediting institutions are members of CHEA.

There is greater diversity within the higher education system in the US than in the UK and Australia, where the nation state plays a more extensive regulatory role. The US approach can also be contrasted to the dominant European model. In the former, universities themselves, operating in a competitive environment, determine their own missions and standards, and there is a social expectation of diversity in provision. In the latter, the missions and standards of different institutional types have been determined by legal statute, and there are social expectations of university equivalence in learning profiles and academic rigour (Beerkens-Soo & Vossensteyn, 2009).

...the UK, like the US, has a dual approach: one that is standards-referenced and the other which is mission-referenced.

Box 2 outlines features of the British system. The British system has a more developed approach to academic standards than Australia, including subject benchmark statements as references for guiding institutional decisions about curriculum and assessment, and external examiners as a source for institutions to validate the relative quality of student achievement and assessment tasks.

The subject benchmarks refer mainly to minimum acceptable (threshold) expectations of (Bachelor's degree) graduates, although they often identify 'typical standards' and some include higher degrees. The external examiners are a form of academic peer review which different institutions engage to check on their achievement against their particular objectives. Thus the UK, like the US, has a dual approach: one that is standards-referenced and the other which is mission-referenced.

Box 2. Features of higher education quality assurance in Britain

External regulations

The guidelines on academic standards and quality issued by the UK's Quality Assurance Agency for Higher Education (QAA) describe the central role of the UK's 'Academic Infrastructure' which features:

- *National Qualification Frameworks*, with their broad descriptions of awards and levels containing a broad description of the academic expectations associated with each level of award, together with more detailed descriptors of the skills and competences associated with award holders. England, Northern Ireland and Wales have a separate framework for Higher Education Qualifications, whereas Scotland has a single framework for all education and training qualifications.
- *Subject Benchmark Statements*, detailed descriptions of expectations for particular subject areas, focused primarily on the UK 'first cycle' degree—the bachelor's degree with honours.
- *Programme specifications*, descriptions of the intended learning outcomes of specific programs, including "the means by which the outcomes are achieved and demonstrated".
- The QAA published *Code of Practice* (intended to provide guidance on the maintenance of quality and standards) covering all aspects of quality management, including assessment and course approval and review as well as external examining.

Internal controls

UK universities and colleges have quite elaborate internal controls over quality and standards. The chief ones are:

- admissions policies, so that only students capable of benefitting from particular programmes are enrolled (though, crucially, these vary considerably between institutions, as well as between subjects within institutions);
- course approval, monitoring and review, so that only programmes that are fit to lead to an institution's award are offered;
- assessment regulations and mechanisms, so that only students who reach the required level of attainment receive awards (again, these vary substantially between institutions);

- monitoring and feedback processes, so that opportunities are taken to improve the quality of what is offered;
- staff selection and development, so that only suitably qualified and trained staff teach students;
- staff appraisal, so that staff receive regular structured feedback on their performance.

External examiners

Within assessment, a key role has traditionally been played by external examiners. These are employed by, and answerable to, the institution concerned. Their job is to report on:

- whether the standards set for awards [at the institution concerned] are appropriate;
- the extent to which assessment processes are rigorous, ensure equity of treatment for students, and have been fairly conducted within institutional regulations and guidance;
- the standards of student performance in the programmes which they have been appointed to examine;
- (where appropriate) the comparability of the standards and student achievements with those in some other higher education institutions;
- good practice they have identified.

External accreditation

Professional, statutory and regulatory bodies usually accredit courses that lead to a professional or vocational qualification.

Sources: HEPI (2010); Harris (2009); QAA (2004).

Box 3 outlines the current arrangements in Australia. The architecture includes: a national qualifications framework; registration procedures for the licensing of providers to offer programs leading to higher education qualifications; consumer protection for fee-paying international students; a range of internal institutional quality monitoring procedures; independent external quality auditing; and public information about institutions, courses, graduate destinations and satisfaction.⁷ The Australian model involves a mix of common and customised indicators of capacity and performance, and has a more developed approach than the UK to consumer protection, through its tuition assurance scheme. Australia adopts a standards-based approach, with a focus on inputs, with regard to the initial accreditation of higher education providers, and a fitness-for-purpose approach to quality auditing, with a focus on processes, with regard to established universities. Quality auditing in respect of other higher education providers is more at arms length via audit of state & territory licensing agencies. Australia's approach has involved the least consistent arrangements for the most risk-exposed sector.⁸

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7. Since 2008, the Australian Government has been developing an approach to validating the quality of university research through the Excellence for Research in Australia (ERA) initiative.

8. As at 6 June 2010, there were 1,179 private providers catering to international students in Australia. Of these, 54 (<5%) had over 500 students and 799 (68%) had fewer than 50 students (source: Australian Education International).

Box 3. Summary of the current Australian Higher Education Quality Assurance Framework

1. **Qualifications** *Australian Qualifications Framework* describes qualification types, their characteristic learning outcomes and pathways to them. Institutions may refer to this in developing courses.

- Institutions and professional bodies recognise and evaluate Australian and overseas credentials (with advice from the National Office of Overseas Skills Recognition).

2. **Accreditation and approval**

- *National Protocols for Higher Education Approval Processes* set out criteria and processes for approving universities and other types of higher education institutions. State and territory governments accredit courses where the institution is not authorised to do so.
- *Education Services for Overseas Students Act 2000* governs the approval of courses and institutions offering courses to overseas students within Australia. The Act also establishes tuition assurance procedures to protect students in the event of failure by a provider to continue operations.
- Institutions approved for Commonwealth funding and assistance must meet the requirements of the *Higher Education Support Act 2003*, undergo a regular quality audit and meet other quality requirements.
- Professional bodies accredit courses on a compulsory or voluntary basis in some disciplines.

3. **Institutional self-regulation**

- As bodies that are responsible for accrediting their own courses, universities and certain other institutions approve, monitor and review the courses they offer through internal peer review and quality assurance.
- Other institutions apply internal quality assurance practices subject to having their courses accredited by State and Territory governments under the *National Protocols*.
- Institutions may follow voluntary codes of practice or collaborate to improve practice.

4. **Independent quality audit**

- Australian Universities Quality Agency conducts regular quality audits of universities, some other institutions and government accreditation authorities. Reports are published.

5. **Information provision**

- Official registers of approved institutions and courses.
- Collection of data for performance indicators, e.g. Graduate Destination Survey and Course Experience Questionnaire.
- Consumer information and websites (e.g. Study in Australia, Going to Uni) backed by requirements of the *Higher Education Support Act 2003*.

6. **External monitoring**

- Various monitoring and annual or other reporting requirements associated with accreditation, approval or audit.

Source: Review of Australian Higher Education. Final Report. 2008.

1.2 Proposed redesign of the quality assurance architecture

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” (Bradley et al., 2008).

Yet it called for a thorough overhaul of the current framework, involving: ‘modernisation’ of the national qualifications framework to provide “more coherent descriptors of learning outcomes”; establishment of a national regulator with stronger powers for registration and re-registration of all higher education providers; revision of the processes for accreditation and audit; the adoption of “outcomes and standards-based arrangements”, and better information including “the performance of institutions in relation to the outcomes- and standards-based arrangements” (Bradley et al., 2008).

In response, the Government announced “a new era of Quality in Australian Tertiary Education” involving the establishment of a national body for regulation and quality assurance with a wide range of functions:

“The Tertiary Education Quality and Standards Agency (TEQSA) will enhance the overall quality of the Australian higher education system. It will accredit providers, evaluate the performance of institutions and programs, encourage best practice, simplify current regulatory arrangements and provide greater national consistency. TEQSA will take the lead in coordinating this work and establishing objective and comparable benchmarks of quality and performance. The agency will collect richer data and monitor performance in areas such as student selection, retention and exit standards, and graduate employment” (Australian Government, 2009).

Paralleling the establishment of TEQSA is a revision of the Australian Qualifications Framework, the development of a set of performance indicators linked to university funding for research and teaching, the exploration of learning and teaching standards in a number of disciplines, and a negotiated set of agreements through ‘funding compacts’ between universities and the central government.

Why has it become necessary to redesign the policy architecture in this way? What particular problems are to be solved? What are the main considerations giving rise to the new policy design?

One of the main reasons given for new forms of accountability for performance in academic areas, which for universities have traditionally been ‘out-of-scope’ for government intervention, is that other countries are developing contemporary quality assurance measures and “Australia now lags in hard measures of learning outcomes” (Bradley et al., 2008). The Higher Education Review report drew attention to the use of external examiners and subject benchmark statements in the UK, the call by the Spellings Commission in the US for increased accountability through the development of instruments to assess student learning, and the work of the OECD in the exploration of ways to assess higher education learning outcomes directly. Thus it is necessary to explore what is happening in other countries and through inter-governmental bodies.

1.3 Different national interests

There are various country-specific interests involved in the emergence of the accountability for quality agenda in higher education.

In the United States of America, where the Spellings Commission under the GW Bush administration raised the challenge of higher education institutions being publicly accountable for learning attainment standards, the underlying concerns were the apparent international slippage of the US against economic competitors, rising tuition prices, poor rates of student retention and degree completion, and a lack of comparable information about institutional effectiveness. A particular problem for the US is that its fastest growing population groups, Hispanic and African Americans—the main source of the future workforce—are those who achieve worst in the schooling system and have the lowest rates of higher education attainment. Earlier interest in improving student learning, from the mid 1980s led to most US states legislating for universities and colleges to implement ‘student assessment’ programs. In the early 1990s, the regional accrediting agencies added an assessment criterion to their standards for reviewing the accreditation status of institutions (Ewell, 2009). The interest in student learning at that time was driven in part by diversification of the higher education population, the adoption of continuous assessment replacing exams, concern about ‘flabby’ curriculum, and ‘research drift’ involving academic staff spending less time on teaching and relying on graduate teaching assistants (Sykes, 1988), and an “increasingly atomistic culture where faculty members focus on their individual specialisations rather than the collective effort to improve teaching and learning” (Dill, 2003).

In Europe, a greater focus on learning outcomes has been seen within the Bologna Process for enabling greater mobility of graduates across European labour markets, for increasing the attractiveness of European higher education to international students and scholars, and as a quid pro quo for new governance and financing arrangements that increase institutional operating flexibility over the use of inputs. A widening of the potential application of learning outcomes may be discerned from the sequence of communiqués of EU ministers, from an initial focus in the 2003 Berlin communiqué on their role in helping to define qualifications to support understanding of the equivalence of awards from different sources, to multiple applications in the 2007 London communiqué including: defining European Credit Transfer and Accumulation (ECTS) credits; aiding curriculum reform and innovation; shaping study programs; and promoting student-centred outcomes-based learning (Adam, 2008).

In Britain, concern about standards has arisen largely from grade inflation in the award of Bachelor’s honours levels, indications that students in England spend much less time studying than their counterparts in European countries,⁹ and questions about the dedication of academics to teaching

A particular problem for the US is that its fastest growing population groups, Hispanic and African Americans—the main source of the future workforce—are those who achieve worst in the schooling system and have the lowest rates of higher education attainment.

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⁹ According to Eurostudent III survey results for 2005–2008, a student in England typically puts in 25 hours of lectures and private study a week, compared with more than 30 in the Netherlands or Germany, or 35 in France.

in an environment that primarily rewards research. The new Conservative-Liberal Democrats coalition government has moved early to require higher education institutions to publish 'employability statements' covering four mandated areas: careers, work experience, curriculum support and accreditation. The new Minister for Universities and Science has indicated a sharper focus on teaching quality and floated the idea of "creating new institutions that can teach, but do so to an exam set externally" (Willetts, 2010).

An earlier initiative by the Blair Government, in the aftermath of the 1997 (Dearing) report of the National Committee of Inquiry into Higher Education, established the current 'academic infrastructure' including benchmark statements, programme specifications, and the Code of practice. A national Quality Assurance Agency for Higher Education (QAA) was created, replacing the Higher Education Quality Council which had been formed in 1992 on the initiative of heads of universities and colleges. The QAA was established to provide independent assessments of how UK higher education institutions maintain their academic standards and teaching quality. Even earlier interest in research and teaching quality in the late 1980s and early 1990s reflected the intent of the Thatcher-Major government to raise Britain's economic competitiveness by improving the labour market relevance of knowledge and skills formation, and shake up what was perceived to be an unresponsive and overly self-serving higher education sector (Middleton, 2000).

In Australia, the matter of 'provider standards' has arisen in the context of the financial collapse of several private tertiary education providers, and associated concerns about inadequate and inconsistent procedures for the entry of new providers into the education export industry. Concerns about 'learning standards' have arisen in the light of incidents of plagiarism, allegations of soft-marking, a blow-out in university student to staff ratios and reduced student time at study, and the Australian Government seeking to enlarge higher education participation, including from previously under-represented groups, initially through un-capping government-funded enrolment volumes in universities. The 2008 review panel, in recommending a "more deregulated and demand-driven funding system...in which higher education providers have the flexibility to set their own entry criteria for students", noted that its adoption would require "a rigorous system of accreditation and quality assurance to ensure that standards are maintained" (Bradley et al., 2008).

Thus in Australia, one purpose is to avoid quality erosion as participation expands. Another purpose is to rid the system of unprincipled providers through more rigorous and nationally consistent licensing procedures. Other purposes have also been suggested, including better performance information to help guide student choice, smoother pathways for learners seeking to move 'seamlessly' through tertiary education and training opportunities, and greater accountability for the effective use of taxpayer funds. Perhaps the multiple roles envisaged for the hydra-headed TEQSA reflect these multiple purposes but there is some risk that means and ends will become entangled.

...in Australia one purpose is to avoid quality erosion as participation expands. Another purpose is to rid the system of unprincipled providers through more rigorous and nationally consistent licensing procedures.

1.4 Internationally converging reform agenda

While various local factors account for the interest of different governments in the new agenda there is also a degree of international policy convergence, most evident among OECD member countries and participants in Europe's Bologna Process. Some circularity in the line of argument needs to be recognised. For instance, the European initiative for a three-cycle (Bachelors/Masters/Doctorate) degree structure was modelled on the "international standard" set by the US (Scott, 2006). Now the US is looking to the Bologna Process as a model for its own transformation (Adelman, 2009). Similarly, the European 'tuning' project derives from the UK subject benchmarks exercise, albeit for different purposes (Brown, 2010a).

Specifically, there is a growing exploration or adoption of national qualifications frameworks, in varying forms and at different stages of development, across many countries not only within but also outside the European Union, including: Armenia, Azerbaijan, Belarus, Bosnia, Croatia, Egypt, Georgia, Herzegovina, Kazakhstan, Kosovo, Kyrgyzstan, Jordan, Lebanon, the Republic of Macedonia, the Republic of Moldova, Montenegro, Morocco, Russia, Serbia, Tunisia, Tajikistan, Turkey (Quintin, 2010).

How far these apparent convergences are similar, and what drives them, is not always clear. To what extent do common solutions to similar problems arising in different circumstances reflect the adoption of fads, rather than considered responses to analysed needs? How much do professional networks, such as quality auditing agencies, linking internationally, promote mechanisms which shore up their own interests? To what extent do inter-governmental bodies (e.g. The World Bank, UNESCO, OECD, ILO) influence the adoption of particular 'innovations' through policy reviews, selective 'good practice' suggestions (e.g. 'charter schools') or conditions on the provision of assistance (e.g. establishing QA processes)? How much of the convergence results from the sharing of technologies or technology borrowing or emulation, rather than "policy learning" (Chakroun, 2010)?

Internationally, the focus on outcomes in government policy spans a number of areas, as reflected in the resolutions of OECD Education Ministers in 2006 (see Box 4).

Box 4. Resolution of OECD Education Ministers, Athens, 2006

Higher education plays a vital role in driving economic growth and social cohesion. It has grown dramatically—with more than 17,000 higher education institutions in the world. At our meeting, we agreed on a new task: to go beyond growth, by making higher education not just *bigger* but also *better*.

We discussed how to meet this challenge. Every country is different, and there were many points of view. But we agreed that a major programme of reform is needed, giving more emphasis to outcomes in particular. Reforms are needed in six areas:

Funding: Some countries, particularly in Europe, need to invest more in higher education; for others the main issue is to make better use of existing funding. Reform will help to develop new sources of funding. A number of countries remain committed to higher education without fees for students, while others now accept the OECD Secretariat view that contributions from graduates to the costs of study can be an effective way of increasing resources, balanced by measures to support students from poorer backgrounds.

More equitable education: Access to higher education needs to be widened to benefit all social groups. This is a real challenge for school systems, as well as for higher education. Action is therefore needed throughout education systems to tackle the problem.

A clearer focus on what students learn: We need to develop better evidence of learning outcomes. At our meeting, the OECD Secretary-General offered the assistance of the OECD in developing new measures of learning outcomes in higher education, drawing upon its experience with the PISA survey.

Promote responsiveness and diversity: Reforms to improve incentives—to make institutions more accountable for quality and outcomes—are needed in many countries. We want to balance accountability for outcomes with a loosening of regulatory controls, and we intend to encourage institutions to pursue diverse missions, responding to the needs of students as well as a wide range of other groups.

Research and innovation: We all recognize the capacity of research and innovation to drive growth in knowledge-based societies. We recognize the twin challenges facing higher education systems—supporting world-class research, and delivering its economic and social benefits both locally and nationally.

Migration and internationalization: We discussed how students, teachers and researchers are increasingly studying and working outside their countries of origin. Most OECD countries are affected, some greatly. Responses include, for example, the Bologna process in Europe. Countries need to look at immigration policies, as well as higher education policy itself, to develop coherent responses.

We all agreed that higher education cannot escape major change. Sometimes change will be difficult. Our meeting here, and these conclusions, represent a clear signal of our determination to lead the necessary changes rather than be driven by them.

Meeting of OECD Education Ministers, Higher Education: Quality, Equity and Efficiency, 27-28 June 2006, Athens. Summary by the Chair, Marietta Giannakou, Minister of National Education and Religious Affairs, Greece.

The 2006 meeting of OECD Education Ministers in Athens discussed in plenary session the topic of *Improving the quality, relevance and impact of higher education*. The record of the meeting reports that discussion was opened by Margaret Spellings, Secretary of Education, United States. She observed that quality, accountability, and affordability are key concerns of the larger OECD community and of the US Commission on the Future of Higher Education. In discussions it was noted that:

“...the 21st Century is witnessing the rapid transformation of higher education. More students than ever before enter higher education and a growing number study abroad. The job market demands new skills and adaptability, and HEIs (“Higher Education Institutions”, which include universities, polytechnic schools and colleges) struggle to hold their own in a fiercely competitive marketplace” (OECD, 2006).

The report of the meeting (OECD, 2006) records that Ministers:

- Expressed shared concern about disparities in entry and success in higher education, and noted that these appear to be based in early learning, at home and in schools. They agreed that equity policies and analysis must focus here.
- Noted that internationalisation of higher education can provide competitive pressures and benchmarking that contribute to quality improvement.
- Recognised that key stakeholders—including students, families and governments—must have better information about topics such as quality and cost to make decisions and hold institutions accountable for their performance. They noted that students must play a key role in assessing both quality and relevance of learning.
- Expressed agreement that higher education should be responsive to economic and social needs, and that graduates should have skills suited, among other things, to working life. They also voiced concern about a possible mismatch between labour market needs and student qualifications.
- Agreed that research should be geared to the need for innovation and be relevant to the problems of the wider

...key stakeholders—including students, families and governments—must have better information about topics such as quality and cost to make decisions and hold institutions accountable for their performance.

society. This requires, for example, suitable policies for knowledge and technology transfer, and research funding systems that are linked to these outcomes.

- Identified areas where the OECD can play a key role for member countries. These include measuring learning outcomes, and hosting international dialogue concerning labour market outcomes and international benchmarking.

The report of another session (OECD, 2006) on the theme of *Measuring the quality and impact of higher education* records that:

“Mr Gwang-Jo Kim, Deputy Minister of Education and Human Resource Development, South Korea, noted that the validity of judgements about the quality of higher education remained contested and highlighted the need for more discussion on standards and methods to be used for defining and evaluating quality in higher education. In particular, while various indicators for the quality of research are available, much more would need to be done to establish appropriate measures for the quality of teaching, to avoid bad teaching going unnoticed and good teaching unrewarded. He underlined that measuring the quality of higher education outcomes was needed both to justify the allocation of public resources and the effectiveness with which they are used by increasingly autonomous institutions, and also to pursue enhancements in the quality and relevance of educational outcomes more broadly and systematically, so that higher education institutions serve economies and local communities effectively. Participants reviewed existing arrangements for quality assurance at national levels. They saw more transparency in higher education outcomes as a key driver for improving institutional performance, but noted that knowledge on standards and methods that can be used to define and evaluate higher education quality was just beginning to emerge. Participants in the working group invited the OECD to explore ways to:

1. *Reduce the knowledge gap about the effectiveness of higher education governance and finance in relation to performance.*

This would require a better articulation of the purposes of higher education as well as agreement on standards and methods to be used for defining the quality of higher education outcomes. This, in turn, would depend on a better assessment of the competencies that would enable individuals to compete in a global economy. Significant challenges would lie ahead in measuring such competencies validly and reliably. Participants also noted the differences in the information needs on the quality of higher education outcomes of providers, governments and employers.

2. *Build on the success of PISA, to explore similar methodologies for assessing the value higher education institutions add in terms of student learning outcomes.*

Work would need to be undertaken in ways that include multi-dimensional criteria for educational quality to reflect the diversity of purposes, consumers and providers of higher education within and across countries. Participants underlined the need to strengthen benchmarking processes in ways that go beyond the ranking of institutions. Assessment systems need to go beyond measurement and enable both governments and the institutions themselves to improve higher education quality in a dynamic process. Quality has many dimensions, and extensive piloting would need to be an essential part of such methodological development.”

Work would need to be undertaken in ways that include multi-dimensional criteria for educational quality to reflect the diversity of purposes, consumers and providers of higher education within and across countries.

1.5 Common governmental objectives

From these deliberations, five broad objectives may be gleaned:

- i. **preventing erosion of quality**—this ‘safety-net’ objective has two aspects. One aspect is to shore up against further slippage relative to past benchmarks. The slippage arises from concerns that apparent productivity gains (graduate output per unit of staff) mask efficiency improvement (lower funding rates per student, and higher student:teacher ratios) at the expense of diminishing quality of educational effort (student time at study, and staff time at preparation, teaching, feedback and assessment), and output (breadth and depth of graduate knowledge and skills). The other aspect is avoiding a structural lowering of quality in the future. Concern about lowering may arise from enlargement and diversification on the demand and supply sides: from the entry of new cohorts of students who are less well prepared than conventional cohorts; and from the entry of higher education providers whose ways and means of teaching and assessment deviate unacceptably from established practices.
- ii. **improving relevance of graduate formation to economic and social needs**, including the development of new capacities and adaptability needed in changing labour markets. This objective implies a change to established higher education ‘fitness of purpose’ assumptions, given expressed concerns about a possible mismatch between labour market needs and student qualifications, and deficiencies in the competence of graduates to perform in the contemporary competitive environment.
- iii. **improving performance in teaching and learning** as a means of addressing objectives (i) and (ii) above. This objective focuses on pedagogy but extends also to the effectiveness of higher education in developing required skills among students. However, it implies a level of external concern about the internal processes by which higher education institutions design and deliver student learning experiences and evaluate their effectiveness.
- iv. **increasing the transparency and accountability of higher education institutions** to students, employers and governments. This is a multi-faceted objective embracing the above three objectives and providing a basis for public confidence that the institutions succeed in educating the students they admit and graduate. It involves improving the availability of information for parents and students to compare institutional offerings, quality and cost in relation to study choices. It involves increasing the information available to employers about the capabilities of their current or potential employees.
- v. **achieving value for money**. This involves justifying the allocation of public resources by demonstrating that they are being used efficiently and effectively.

Some interaction among the objectives can be noted. For instance in the OECD discussions reported above, there are crossover references to “pursue enhancements in the quality and relevance of education more broadly and systematically, so that higher education institutions serve economies and local communities effectively”, and some see “more transparency in higher education outcomes” as a “key driver for improving institutional performance”. Taken together, they suggest a strongly reformist intent, as indicated in the Athens communiqué, with ministers expressing “determination to lead the necessary changes rather than be driven by them.”

The accountability objective is overarching; it brings together relevance, performance and transparency. This is the defining characteristic of the new “accountability for quality agenda”, and it is far-reaching.

1.6 A shared purpose?

The interest in shoring up the quality of higher education—the quality of the experience for learners and its effectiveness in producing graduates with the requisite understandings and abilities—is shared within as well as among nations. In Australia, Britain, the US and elsewhere, suggestions have been made to governments from time to time that higher education quality is deteriorating through the combined effects of wider participation, erosion of the funding rate per student, reduced study time and lower levels of student engagement, increased administrative and research workloads of academic staff, the extensive use of casual staff for teaching, and financial pressures to pass fee-paying students.

However, there are some differences in the ideological motives of parties in government. Conservative politics, especially in the US but also penetrating the so-called ‘culture wars’ in other countries, including Australia and Britain, stress ‘basics’ in learning. The predisposition of the conservative approach (to generalise a mix of orientations) is to ‘blame’ curriculum cluttering with ‘relativist’ or ‘left-leaning’ perspectives for a demise in student learning achievement in the ‘basics’. Extensive media coverage around this agenda saw apparently increasing community support for it to the extent that other political parties, especially those whose traditional appeal to voters rested on progressive education, have adopted core tenets of the conservative view. Thus we have an apparent political consensus on the need to restore and verify educational standards (whatever they are). Ironically, a main target of conservative attack, in the US, Australia and elsewhere, has been the outcomes-based education (OBE) reform agenda, which focused on individual student performance assessed against criteria specified in learning objectives, rather than compared with the rest of the class, but which reduced the importance given to curriculum content.

A related concern, but one which is more contentious, is that of the ‘comparability’ of graduate attainment. Country reviews have pointed to asserted but unverifiable differences in the quality of graduate output from one institution to another. The Spellings Commission remarked on the absence of information about “how much students learn in colleges or whether they learn more at one college than another.” The UK House of Commons Select Committee for higher education argued from the premise that “students, understandably, want to know the worth of their degrees” but observed an absence of comparable standards. The Select Committee favoured nationally “consistent” standards, noting that students who have limited study choices do not wish to be discriminated against by virtue of their degrees being seen to be inferior to those of another institution but without evidence of commonalities and differences.

“...students, understandably, want to know the worth of their degrees...”

This ‘comparability’/‘consistency’ objective brings together aspects of transparency, recognition of qualifications wherever or however obtained, relevance of learning to labour market requirements, and equity and fairness in opportunities for students. It also challenges the objectives of diversity and excellence.

The meaning given to key terms like “outcomes”, “standards”, “competence”, “employability”, and various qualifiers such as “comparable”, “consistent”, “equivalent” and “same”, varies across countries and within them. The lack of a common nomenclature in the policy discourse makes it difficult to understand how much “convergence” there is in intent and practice. Additionally, the bundling of different purposes (e.g. to ensure minimum standards of operation, to justify expenditure of public resources, 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. These matters are considered in some detail at Part 4 below.

In his address to the 2009 UNESCO World Conference on Higher Education, the OECD Secretary-General identified the need for concerted action in three areas:

"The first priority is access and equity... The second priority area is efficiency and effectiveness... The third key area is quality and relevance. The (financial) crisis means that institutions need to work smarter. One proven way to progress in this regard is to encourage institutional autonomy. That means greater freedom to determine curricula, research priorities and strategy. Of course, that autonomy has to go hand in hand with accountability for outcomes and the way resources are used" (Gurria, 2009).

We can draw upon this statement, alongside the 2006 Athens communiqué of OECD Ministers for Education, to distil the overarching challenge from the perspective of governments. That is:

cost-effectively enlarging higher education access and success through greater operating flexibility for institutions with stronger accountability for results and without diminution of quality.

Importantly, if this is the main agenda, then it should be one of mutual benefit for higher education institutions and governments, as well as for students, employers and other interested parties. Thus it could be an agenda of joint development.

However, there are three major hurdles to be overcome on the path to collaborative reform. One hurdle is substantive: the adequacy of funding per student, at least in the public university sector which, in all countries, is subject to a level of price control by government. A quality agenda that is predicated on diminishing resource inputs, through reduced government outlays and tuition price limits, will be seen for what it is: a political device to deflect responsibility. The adverse reaction to the 2006 report of the Spellings Commission reflected *inter alia* a strong view that the political intent was to provide higher education on the cheap (Bennett, 2007). The main indicator to watch in this respect is the student to staff ratio. The Australian Government has recognised the importance of the student staff ratio in the quality of the student experience:

"Relative to the UK, Australian graduates from the class of 2006 rated their university experience lower on every measure bar one—which related to satisfaction with the feedback they received.

Relative to the US and Canada, Australian graduates from the class of 2007 rated their university experience lower on every measure—with no exceptions.

Discrepancies in ratings between Australian graduates and their UK and North American counterparts appear to be greatest in those areas most impacted by large student—staff ratios, such as:

- *Student and staff interaction*
- *Enriching educational experiences*
- *Whether staff are good at explaining things*
- *Whether teaching staff make subject material interesting for students."* (Gillard, 2009).

A quality agenda that is predicated on diminishing resource inputs, through reduced government outlays and tuition price limits, will be seen for what it is: a political device to deflect responsibility.

A second hurdle relates to the management of tensions among the competing interests of different stakeholders. An agenda to increase the relevance and responsiveness of higher education to the needs of employers, or to 'put students first' in terms of ensuring they can exercise choice and gain value through higher education, can be seen to involve a desire to break free from 'provider capture', and that can lead to adversarial positions, not least because it is predicated on the assumption that higher education institutions are unresponsive and care insufficiently about students.

A confrontational approach on the part of government bodies can limit the scope and undermine the sustainability of reform. It might provide executive government with simple campaign themes and single out an enemy to be defeated as a means of garnering political support from particular constituencies, as has been seen in various countries through battles to overcome teacher union resistance to the publication of school-level results of students on literacy and numeracy tests. But an approach that alienates professional educators rather than gains their sign-on may achieve only superficial compliance and fail to achieve real reform, while eroding deeper educational foundations.

Similarly, self-interested resistance by universities to legitimate concerns of the community, rather than efforts to shape the agenda, can result in lost opportunities and poor design of policy instruments. In the context of the debate around the Spellings Commission in the US, it has been suggested that “the current choice is between proactively taking responsibility for demonstrating accountability on the academy’s own terms or passively having requirements dictated from the outside with little or no control” (Ewell, 2009). However, a third path to explore is that of joint development of a mutual responsibility framework that serves the purposes of governments and the communities they represent, and higher education institutions and the communities they serve.

The third hurdle relates to scope. A broad scope that admits diversity and provides flexibility is more likely than a narrow scope that envisages commonality and seeks compliance to address the issues at hand and gain professional support. On the one hand, the scope envisaged in the communiqués above appears to be wide, encompassing a range of policy areas, including funding, student access, teaching and learning, research, and internationalisation. On the other hand, there is a narrowness of concept underpinning the overall approach.

By way of illustration, the Athens working group on ‘measuring quality and impact’ identified as a goal, to reduce the knowledge gap about the effectiveness of higher education governance and finance in relation to performance. It suggested that “this would require a better articulation of the purposes of higher education as well as agreement on standards and methods to be used for defining the quality of higher education outcomes.” The inferred line of argument is that (i) effectiveness needs to be measured in order to inform government decisions about funding and governance (of institutions that ‘provide’ higher education); (ii) for effectiveness to be measured the purposes of higher education need to be made more explicit; (iii) (provider) performance in relation to purposes needs to be based on student learning outcomes; (iv) (learner) performance in relation to outcomes needs to be standards-referenced. Importantly, the group went on to assert: “This, in turn, would depend on a better assessment of the competencies that would enable individuals to compete in a global economy. Significant challenges would lie ahead in measuring such competencies validly and reliably.” Thus the line of argument continues: (v) learning outcomes need to be economy-relevant and competency-based; and (vi) the main challenge is to work out how to measure the competencies properly. By this logic it becomes appropriate and theoretically feasible to compare the performance of different providers against a standard set of competencies expected of graduates for a given level of qualification.

However, there are several leaps in this logic chain, the most obvious leap being that from (a) the need for standards-referenced performance assessment to (b) the need for common standards. Standards are typically fixed criteria against which all products or services in a class may be assessed. But there

...a third path to explore is that of joint development of a mutual responsibility framework that serves the purposes of governments and the communities they represent, and higher education institutions and the communities they serve.

are usually different standards set for different classes according to the level of performance expected. In a competitive race, for instance, qualifying standards for athletes vary according to talent and task; you don't expect local athletes to be judged against Olympic standards just as you don't test Olympians merely against local standards. There may well be common principles applied, e.g. that no competitor should gain unfair advantage through use of drugs or technological aids, or that all participants in an event should be able to demonstrate track record to complete the task. However, the standards to which any common principles apply are not the same.

There are practical dilemmas, alongside a body of research evidence casting serious doubt on the validity of using standardised tests of general intellectual skills for assessing individual students, then aggregating their scores for the purpose of comparing institutions (Banta, 2007). In Part 5 below, this 'logic 1' model is contrasted with a 'logic 2' model, which locates the onus for demonstrating effectiveness on the assessment function of individual higher education institutions.

1.7 The problem of conflation

There are three conflations of particular interest in the above line of argument. One is that institutional effectiveness is a product of student achievement. A second is that higher education learning outcomes can be reduced to competencies. And the third is that qualifications stand independent of the experiences that shape learning and the places where they are obtained and, by inference, universities are no different from other institutional types, nor from each other, in the production of graduates.

To what extent should the effectiveness of a university be determined on the basis of the success of its students and graduates? This question itself poses a multitude of queries, e.g. What roles are universities expected to play in contemporary society? How do universities differ from other 'providers of higher education services'? How much is the worth of a university education "a function of being there" (Brennan et al., 2010) derived from the cultural values it represents, the insights it exposes, the experiences and interactions it enables, the new interests it develops, and the social networks it helps to forge? Insofar as higher education quality is essentially a reflection of the quality of relationships—between students and teachers, among students and among researchers—is it "more appropriate to evaluate a university's capacity to build a community of learning than it is to measure the characteristics of university outputs" (Sursock, 2007)? What is graduate success, and at what point should graduate success be evaluated? Should graduate success be measured against what a qualification testifies to or against the utility of the qualification in providing access to employment or further learning? How can we identify the specific contribution of universities to graduate capability development (separate from other life-forming experiences)? Given differences across disciplines and study programs, how useful is it to compare institutional averages or ranges? How appropriate and meaningful is it to compare diverse institutions having different populations and purposes against the same standards? And to what extent is graduate achievement a product of student effort in making use of the opportunities offered by a university?

"A student's coursework and classroom experiences shape both the nature and extent of his or her acquisition of subject matter knowledge and academic skills...what the student does to exploit the academic opportunities provided by the institution may have an equal, if not greater, influence" (Pascarella & Terenzini, 2005).

The conflation of higher education with competency accumulation, as distinct from knowledge and skills integration, is especially worrying in the Australian context, where a positivist, atomistic model of competency-based training in the vocational education and training (VET) sector is narrowly oriented to operational skills, and where 'modernisation' of the Australian Qualifications Framework involves aligning outcomes statements across the vocational and academic domains, based on the VET competency model. For universities, this conflation is dangerous, for it reflects an idea of the university as no different from any other 'provider' of higher education services and as "merely a source of modular products currently in vogue" (Boulton, 2010).

1.8 The problem of confusion over standards-based approaches to learning outcomes

The notion of standards-based learning outcomes for purposes of national quality assurance is confusing.

For the standards-based bit, what is a 'standard' and what is the scope of the agenda: standards-based education; or standards-based teaching; or standards-based student achievement; or standards-based institutional performance; or standards-based assessment; or standards-based reporting, or all of the foregoing? Whose standards? Who is to set them? Who is to own them? Are they to be fixed or dynamic standards, standards of acceptability or aspirational standards? Are they standards relevant to particular programs or institutions or are they common standards?

For the outcomes-oriented bit, what is an 'outcome' and what is the scope of the agenda: educational outcomes, cognitive achievement, assessment outcomes, employment outcomes, income outcomes, wellbeing outcomes? And if the focus is on 'learning outcomes', which ones—enabling or culminating (Spady, 1994)?

What are the objects of comparison and the criteria? How would national sets of objects and criteria fit with different institutional purposes and approaches to curriculum, teaching and assessment? Or is there an implicit agenda to develop a common curriculum in higher education as is happening in primary and secondary education? If standardised tests are to be used, how could they do any more than indicate the spread of student achievement along a limited set of generic measures? And what inferences could be validly drawn about institutional effects? If the object of comparison is the assessed works of students, for which sample of works? at what point in time to degree? at a 'pass' or other grade? And what would be shown—the variability of student achievement or the variability of assessment—and what would the 'findings' be taken to mean—that variability is good or bad?

In its extreme form, the proposed approach envisages comparing higher education output quality independently of the learning setting, the disciplinary context, and the purpose of both the student and the higher education institution. This matter is considered in Part 4 below.

In the Australian context, the Bradley panel, citing Martin & Stella 2007, asserted that “significant evidence exists internationally of an increasing need for quality assurance based on achievement of standards and a shift away from the earlier predominance of the fitness for purpose approach” (Bradley et al 2008, page 133). The panel went on to argue that “Australia is at risk of being left behind if it fails to respond to these international pressures.” However the cited text offered a much more nuanced reading of international pressures and response options. Importantly, the cited authors distinguished between the purposes of ‘accreditation’ of providers and ‘quality assessment’ and ‘quality audit’ (Martin & Stella 2007). They also made a number of significant observations about the appropriateness of different approaches in different circumstances. In particular, they noted that whereas a ‘fitness for purpose’ approach is the more appropriate approach for quality improvement, ‘accreditation’, which imposes a cut-off point as to what is acceptable and what is not, is most appropriate for quality control in circumstances of rapid growth of private higher education providers, where its role is to protect students and families from low-quality or fraudulent providers:

“When the aim of external quality assurance (EQA) is to judge whether an institution or a programme should be accredited or not, it is necessary to use a standards-based approach.

Accreditation, the standards-based approach of EQA, may apply either minimum or high-level standards. When minimum standards are used, which is more common, it tends to resemble a

licensing scheme for institutions or programmes, and thus functions as a periodic licensing system. Minimum standards usually address input factors relating to students, staff, buildings, facilities and finances, as well as process elements such as governance and management systems. The main objective of such an accreditation system based on minimum standards is to enforce conformity with standards and accountability” (Martin & Stella 2007).

Thus “standards”, in this context and for this purpose, are “minimum norms” demanded of all accredited higher education institutions and for which they must be accountable (Martin & Stella 2007). The reason for the increasing international use of a standards-based approach is the considerable growth in the number of private providers of higher education and the need to tighten loose licensing procedures.

It does not follow that there is a shift away from fitness for purpose approaches to external quality auditing, internal quality self-regulation and assessment. To the contrary, in summarising the findings of the OECD international review of tertiary education over 2004-07, it was noted that “the emphasis is shifting in many countries from external control and regulation to greater responsibility by TEIs (tertiary education institutions) for their own quality monitoring, thereby leaving greater scope for internal mechanisms geared towards improvement” (Santiago et al, 2008). The representation of the wider adoption of standards-based approaches to licensing as a retreat from fitness-for-purpose quality assurance is based on a false dichotomy. In the US, the UK and Europe it is widely understood that, with threshold norms safeguarded, the best approach is one that promotes improvement and diversity (Borden 2010; Ewell 2009; Martin & Stella 2007; Dill 2003). To that end it is seen to be necessary both to build academic capacity and professional commitment to improvement, and to provide the community with confidence through greater transparency and external verification of institutional quality self-regulation.

As the Bradley panel noted, Australia’s quality assurance system in respect of universities does not give rise to any crisis of confidence (Bradley et al, 2008). Australia’s basic problem has been that its provider licensing requirements and procedures have been fragmented across different jurisdictions. Even where a reasonably demanding threshold has been set for initial registration of private providers, there has been insufficient monitoring of provider compliance with the conditions of registration (e.g. number of students, number of qualified teaching personnel). Hence a strengthening of the accreditation system is necessary, for both initial provider licensing and periodic re-registration.

However, it does not follow that the fitness for purpose approach to quality assurance for institutions that exceed the threshold registration requirements should be discarded or transformed within a stronger accreditation regimen. When such a shift, which involves ‘satisfy’ or ‘not satisfy’ assessments, is paralleled by a re-alignment of the national qualifications framework within a competency-based model, which involves ‘meets’ or ‘does not meet’ assessments, risks arise that important features of higher education will be overlooked and undervalued, that innovation and diversity will be stifled, and the course will be set on a path to mediocrity.

The reason for the increasing international use of a standards-based approach is the considerable growth in the number of private providers of higher education and the need to tighten loose licensing procedures.

...it does not follow that the fitness for purpose approach to quality assurance for institutions that exceed the threshold registration requirements should be discarded or transformed within a stronger accreditation regimen.

1.9 Why it is an 'accountability' agenda

The value of any particular quality is a stakeholder-relative concept (Newton, 2010), and in higher education the key stakeholders are academic institutions, students, employers of graduates, and governments. There can be fundamental differences in perceptions of 'quality' between these different stakeholder groups as well as differences within the groups, and these can give rise to misunderstandings and conflicts (Harvey & Green, 1993; Santiago et al., 2008).

Approaches to quality assurance can be distinguished in terms of their concern for accountability or improvement (Sachs 1994). From a higher education system perspective both approaches are necessary (Santiago et al 2008), yet there is some dispute about the extent to which they are compatible (Vroeijenstijn, 1995; Thune, 1996; Woodhouse, 1999; Dano & Stensaker, 2007). Some argue that there are essential differences between accountability-driven external QA processes and improvement-oriented internal QA processes (Ewell, 2009). The former are seen to focus on summative, objective (largely quantitative) comparative indicators of performance against fixed standards for public reporting while the latter adopt formative and more nuanced (qualitative as well as quantitative) indicators of progress designed to guide educational interventions through multiple feedback loops. Some suggest that external processes do little more than induce compliance because they fetter academic engagement (Middlehurst and Woodhouse, 1995), or lead to 'gaming' or short-term 'impression management' (Williams, 1997; Newton, 2001; Harvey, 2004), while others contend that external processes can act as a fillip to internal improvement (Stensaker, 2007), as is claimed for the AUQA audits in Australia over the period 2002-2008 (Bradley et al., 2008).

To the extent that the new quality agenda involves mostly quantitative comparative indicators and is designed via a "determination to drive change" on the part of governments, it is predominantly an accountability agenda. The available evidence indicates that compliance regimens do not induce institutional performance improvement. In the case of the US, for instance, Dill has found that "traditional accreditation, state assessment regulations, and performance funding have generally been ineffective in strengthening institutional processes for academic quality" (Dill 2003). If improvement is a government objective, then room needs to be made purposefully in the policy design for institutionally-driven, academically-led approaches to quality enhancement.

The available evidence indicates that compliance regimens do not induce institutional performance improvement.

2. Drivers of policy change

This part explores the various interacting sets of forces that appear to be driving the new higher education “accountability for quality agenda” and its main elements of relevance, performance and transparency: first, wider expectations of higher education and university research; second, the changing nature of the demand for and supply of higher education; third, changes in the understandings and abilities required in contemporary occupations; fourth indicators of quality erosion in higher education; fifth, disaffection with conventional quality assurance and performance reporting; and sixth, a range of motives for increasing the responsiveness of higher education to student and wider community needs. As there are double-edged dimensions to these various considerations, the following discussions locate the drivers in a context of contestation.

2.1 Wider expectations of higher education and university research

Contemporary universities have enlarged roles through accumulation over time of multiple functions from their own initiatives, state directives, market opportunities and social expectations. They enrol and graduate a larger and more diverse student mix in an expanding range of fields of study to meet an increasing variety of occupational and other requirements. They undertake research directed towards complex ‘global problems’, ‘national priorities’ and demonstrable ‘end-user benefits’, and contribute to national and regional development. They have to keep pace with international developments and adjust to changing relationships with students as paying customers. And they operate with more exacting public accountabilities for the cost-effective use of resources. It is because universities have become more integral to the knowledge society they are more roundly subject to scrutiny. As society becomes more knowledgeable, universities come under pressure to expand the kinds of knowledge they provide and to diversify the criteria by which they are judged (Bleiklie & Byrkjeflot, 2002).

Additionally, various users of the services that universities provide also seek to influence the nature and form of those services, whether research outputs or learning opportunities. Higher education graduates represent an increasing proportion of the workforce in advanced economies. For many occupations, a Bachelor’s degree or higher level of educational attainment has replaced the school leaving certificate as the entry ticket to employment. Indeed, it has been suggested recently that “in the knowledge economy, a graduate degree will become the new bachelor’s degree, the minimum education credential that high-skills employers require” (US Commission on the Future of Graduate Education, 2010). In Australia, there has been an acceleration in the number of occupations for which a Master’s degree is required for professional entry, one consequence of which is that government supported places are replacing previously full fee places. A significant implication of this trend, whether skills deepening or credential inflation, is that the Bachelor’s degree is becoming a foundation qualification for further learning, even in Australia which has traditionally had a preference for early specialisation.

...because universities have become more integral to the knowledge society they are more roundly subject to scrutiny.

Governments and employers, along with professional bodies, are consequently seeking to expand their influence over matters of curriculum and assessment just as much in tertiary education as in secondary education, largely to ensure that students are learning what it is perceived they need to learn to be productive:

"...as an undergraduate degree comes to replace the high school diploma as a gateway to even basic levels of sustainable employment, distrust increases in the professional authority of the professoriate. With increasing influence and declining trust, the focal point of professional accountability shifts from members of the profession to the clients and their representatives" (Borden, 2010).

Shulock (2003) has captured the essence of the shift in public policy orientation within the United States, with the application to higher education of the accountability assumptions developed for state-controlled schooling:

"Until fairly recently, states largely delegated accountability to higher education institutions and their governing boards. Universities' claims to academic freedom and autonomy were respected, with governments' interest largely confined to matters of budgetary allocations, location of campuses, and tuition rates. Elected officials trusted academic leaders to guide universities in directions that were of mutual interest and benefit. This hands-off approach to oversight of higher education continued until the public sector accountability movement was well entrenched in the early 1990s. A shift has occurred over the past decade in the balance between autonomy and accountability for public higher education. With accountability for K-12 education in full drive, policymakers are no longer willing to exempt higher education from this kind of oversight. Higher education institutions are struggling to respond in ways that preserve valued principles and honor institutional missions" (Shulock, 2003).

Post-Spellings discussions by US leaders in higher education, in an effort to assuage political and community concerns, led to a fuller appreciation of the decline in traditional regard for universities and the rise of new expectations:

"For much of American history, there has been considerable deference to, and confidence in, our colleges and universities as providing the best higher education system in the world. The past twenty years or more the traditional deference shown to higher education has been gradually replaced by increasing questioning and criticism. Business leaders, public officials, and the public more generally are asking that higher education show more clearly the results of the large investments in colleges and universities. These concerns are especially pressing as higher education also seeks to serve a greater proportion of the population and to meet the country's need for an increasingly well-educated, economically competitive, and socially responsible citizenry" (Leadership Alliance for Student Learning and Accountability, 2009).

Such expectations on the part of the broader community, on the one hand, whose support is essential to the sustainability of universities and, on the other hand, whose own sustainability is more dependent than ever on the contributions that universities make to economic, social and environmental problem solving, cannot be simply dismissed, trivialised or evaded. Indeed, governments in all jurisdictions 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. 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.

"...as an undergraduate degree comes to replace the high school diploma as a gateway to even basic levels of sustainable employment, distrust increases in the professional authority of the professoriate."

The Spellings Commission's call for standardised testing and reporting of higher education learning outcomes was seen by some as limiting the vision of the university to "a training center for the broader economy and its key industries" (Rhoads & Liu, 2009) and giving priority to what Aronowitz (2000) identified as "higher training" rather than "higher learning".

In their reflective essay of 2008, *What are universities for?*, Geoffrey Boulton and Colin Lucas offer a corrective to the narrow and immediate instrumentalism of government policies in many countries. They note "a growing tendency to see universities as sources of highly specific benefits... particularly marketable commodities for their customers, be they students, business or the state." They suggest that research universities are able to make such contributions because they deal with the universality of knowledge:

"They seek to understand that which we do not understand; they seek to explain complexity; they seek to discover that which is hidden from us. They seek to establish what is common to all of us and what distinguishes us each from another or each group from another. These things are common to the whole of university endeavour whatever the discipline. They are not 'academic' in the pejorative sense of the word, but are of profound, practical utility. They are the foundation upon which the university enterprise rests and upon which its significance for society is built" (Boulton & Lucas 2008).

... "a growing tendency to see universities as sources of highly specific benefits... particularly marketable commodities for their customers, be they students, business or the state."

Hence they argue that governments should respect the essential core of the university and not act to erode or circumscribe it. This is not a novel reminder. As Derek Bok observed two decades back, universities "help in but do not determine" outcomes such as effective corporate governance, sound financial regulation, competent government, effective schools, improved health or reduced poverty. He cautioned that "we will debase our academic institutions and the work they do if we think of them merely or even primarily as means rather than ends" (Bok 1990). And so it continues that universities, at times, play unwelcome roles as sites for the expression of uncomfortable thoughts: "It is the academic's job in a free society to serve the public culture by asking questions the public doesn't want to ask, investigating subjects it cannot or will not investigate, and accommodating voices it fails or refuses to accommodate" (Menand, 2010).

In Australia, Britain and the US, universities are not organs of government but are self-governing institutions that own themselves. Interestingly their reliance on government as a source of funding has been diminishing but the claims of government through principal-agent financing relationships have been expanding whereby governments regard universities as instruments for the achievement of government goals (or arguably community goals mediated by the government). However, the special position claimed by the 'institutions' of higher education, especially universities, is itself challenged by the diminished public authority of institutions generally (Nisbet 1975), whilst the integration of higher education with mainstream economic policy has generated new expectations of accountability:

"The consolidation of mass HE and the growing influence of economic ideas in institutions and in HE systems are both relevant to understanding some of the recent developments regarding quality assurance and performance evaluation as seen by the increasing scrutiny of institutions' performance and their capacity to respond effectively to a series of multiple economic and social demands, which have been added to their traditional missions. These trends have brought about a changing relationship between HEIs and governments, not only increasing institutional autonomy but also a growing influence of economic rationality in institutional regulation and decision-making. This has led to more extensive accountability and scrutiny of an institution's activity, with a notable emphasis on the promotion of explicit assessment of the institutions' internal and external efficiency and effectiveness" (Teixeira, 2010).

2.2 The changing nature of higher education demand and supply

The diversification of higher education supply in post-mass (or near-universal) systems, through private for-profit and not-for-profit providers, alongside public institutions and public-private partnerships, some of them spanning sectoral and national borders, and employing a mix of delivery modes, stretches the pre-mass conventions of internal self-evaluation for sustaining community confidence in the integrity of higher education. In this more open and competitive environment, the decision of a student to pursue a higher education degree “is increasingly becoming a matter of taking risks” (Wangenge-Ouma & Langa, 2009).

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:

“When university systems were small, catering mainly for the upper and middle classes of society, and when there was little movement of students from one university to another—either during a course or to take a second degree—universities could rely on there being a shared body of knowledge. However eccentric and confusing the systems and practices of a particular university might be, it mattered little because everyone who had studied there could understand them and everyone else took their excellence on trust. A degree from Athens, Bologna, Cracow, Heidelberg, Oxford or Paris spoke for itself. But the old forms of trust, appropriate to an elite system, are insufficient when confronted with millions of students, hundreds of thousands of courses, thousands of universities and with the demands of millions of employers” (Floud, 2007).

In contemporary circumstances, the prior bases for trust in the worth of educational qualifications are called into question. The traditional bases of trust, whether prior knowledge of the awarding institution or confidence in the processes of external verification by peers, have been challenged for their subjectivity, exclusivity and narrowness:

“The first was that they were unreliable and subjective. The basis of judgements was never made explicit and it was argued that they could be prejudiced against certain kinds of learners. The second ground for dissatisfaction was the reliance of traditional qualifications on ‘norm-referencing’—the assumption that there is a relatively fixed proportion of each cohort able to display capability at a given level. The third criticism was that the basis of judgement was narrow; it had difficulty in coping adequately with comparing people from different countries or even from unfamiliar institutions or with making judgements about those with experience but not with qualifications” (Young, 2007).

In response, a model of ‘trust-free’ specification of criteria has emerged, but not without its own difficulties resulting from a tendency to over-specification with a consequential trivialisation of outcomes and lowering of standards (Wolf, 1995) and tension between educational purposes and accountability requirements:

“Criterion-referenced testing and statements of competence or outcomes that are found in qualifications frameworks appeared as an obvious solution to these problems. A further assumption

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of the criterion-based approach was that greater reliability could be achieved with the more precise specification of criteria and that, as a result, assessment would rely less on the subjective judgements of assessors; their activity would become more procedural than judgemental. It was assumed that the greater specification of criteria would not only mean a more accessible and fairer system for learners but that the trust and interpretive judgement that had been a core feature of traditional systems would become increasingly irrelevant” (Young, 2007).

The massification of higher education, and the associated over-production of graduates relative to labour demand for them in particular areas, gives rise to the need for students to form a range of skills that enable them to work effectively in areas other than their field of study concentration. It also generates a call for new ways of discriminating among graduates. Reliance on institutional reputation no longer suffices in a diverse mass system, and greater attention is paid to the capabilities of graduates themselves. Some institutions, such as the ATN group of universities in Australia have taken steps to embed capability development in curriculum and assessment, “as a means of diluting the effects of reputational differentiation” (Nunan, 1999), and to expand systematically the information they provide about the capabilities developed by their graduates, including through student records and portfolios. Others call for more comparable measures of student achievement across national systems, particularly in relation to a common set of generic skills (Coates, 2007b).

The internationalisation of higher education, including the internationalisation of curricula, cross-border delivery and growth in international student mobility, makes it necessary to see higher education qualifications beyond the national contexts of their awarding. 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. In some professional fields there are international agreements covering mutual recognition of qualifications, such as for Engineering: the Washington Accord (1989), the Sydney Accord (2001) and the Dublin Accord (2002); as well as agreements covering competence standards for practising engineers—the APEC Engineer agreement (1999), the Engineers Mobility Forum agreement (2001) and the Engineering Technologist Mobility Forum agreement (2003).

The European Parliament and Council’s adoption of a European Qualifications Framework recognises that “Europe’s education and training systems are so diverse that a shift to learning outcomes is necessary to make comparison and cooperation between countries and institutions possible” (European Commission, 2008). The European initiative of the ‘diploma supplement’, offers a mechanism for graduates to show what, where and how they have learned, and the equivalence of their credentials.

Some envisage a radically transformed set of arrangements for higher education in the future, operating through mixed platforms on a global scale (see Box 5). Within host nations of internationalised institutions as well as for new local entrants, the development of criteria against which the capacity and performance of different providers can be assessed is seen to be necessary for competitive market development, especially where long-established institutions have reputational advantage which is not subject to objective demonstration and where new providers cannot rely on such status signals (Alderman & Brown, 2007).

...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.

Box 5. A vision of Higher Education in the Future

"The emerging learning enterprise involves designing and creating experiences that provide opportunities to discover and gain 21st century competencies based on assembly, synthesis, perspective, critique, and interconnected systems thinking. The mechanisms for certifying competency (along with what I will refer to as emergent learning communities) provide the value—and brand—of traditional universities in the 21st century. The traditional university, once a near monopoly producer of graduates with valued and relevant skills, has given way to a growing number of providers of valued and relevant skills and education in the maturing connected learning era.

My view is that in the open-access movement, we are seeing the early emergence of a meta-university—a transcendent, accessible, empowering, dynamic, communally constructed framework of open materials and platforms on which much of higher education worldwide can be constructed or enhanced. The Internet and the Web will provide the communication infrastructure, and the open-access movement and its derivatives will provide much of the knowledge and information infrastructure.

The Internet enabled a worldwide connected infrastructure that supported acceleration of the global economy and a variously described flat or flat-with-some-bumps world. Scholars from peripheral outposts, far from pre-Internet knowledge clusters, gained equal access to scholarly research materials and near real-time interaction with colleagues at the most prestigious institutions. This dramatic reframing of scholarship has not been accompanied by a parallel transformation in the student experience, represented by scalable, cross-national collaborations between students of diverse backgrounds."

Gonick, 2010.

Gonick's technology-driven view of the future contrasts with Wildavsky's talent-driven view, where more powerfully informed and motivated students are seeking out excellence within a global frame of reference, in response to which leading brand institutions will be driven to replicate themselves, or otherwise guarantee consistently high standards through their internationalised operations and alliances:

"Whatever direction global higher education takes going forward, one thing is clear: the growing number of internationally mobile students, intent on finding excellence in research and teaching, have already begun to create a world in which, to an unprecedented extent, talent can be identified and find the best possible academic home—a version of what, in real estate, is known as the 'highest and best use'. Policymakers seeking to reap the advantages of a thriving and open higher education system will make little headway toward creating good universities, let alone globally great ones, without understanding that meritocracy and the free exchange of ideas form the core of the university" (Wildavsky, 2010).

Students seeking international experience as part of their higher education are interested to obtain home credit for the courses they complete in other institutions. Typically, home universities will look for equivalence of institutions and programs in determining how much credit to transfer. In this context, groups of similar universities are forming in various countries and they are networking with like groups elsewhere for research collaboration and student and staff exchange. These arrangements of mutual selection, which go beyond national frameworks formed by governments, are driven by academic judgements about relative quality. A particular expression of this "increasingly important form of implicit international accreditation" (Tan, 2010) is the growth in the number of joint graduate research degree programs with external partners of similar ethos. Underpinning these partnerships (e.g. National University of Singapore with Imperial College, King's College London and the Australian National University) are understandings about "consistency of admission standards and some degree of comfort in the internal assessment processes, like course requirements, qualifying examination, and thesis advising and supervision" (Tan, 2010).

The concurrent modernisation and globalisation of higher education may be seen to reduce differences among countries and highlight inconsistencies within countries, with the inference that we may see supra-national arrangements also having increasing significance:

“...no country will be satisfied with the fragmented, divided and partial qualification system that emerged from the 19th century with all their barriers, cul de sacs and blocked progression opportunities for all but a few. There will continue to be support for national, regional, and increasingly international qualifications frameworks as a response to the increasingly global character of both labour markets and systems of higher education” (Young, 2007).

Hence we can observe different sets of response options to the challenges arising from the diversification of higher education demand and supply. One set of responses is institutionally-grounded, whether (a) through improvements to internal assessment practices, or (b) structured recording and reporting of graduate capabilities, perhaps as a competitive differentiating strategy, or (c) alliances with similar institutional types nationally and internationally, perhaps as a talent-attracting or quality-validating strategy but most importantly as a means of providing students with the best possible learning environments. A second set of responses is system-based at a national level, whether (a) narrowly through the reporting of student performance measures on standardised tests of generic skills, or (b) publication, within a common template, of information about institutional capacity, offerings, other indicators of graduate achievement, destinations and satisfaction. A third set of response options focuses on field-of-study or professional specifics, and increasingly on an international frame of reference.

Hence we can observe different sets of response options to the challenges arising from the diversification of higher education demand and supply.

2.3 Indicators of quality erosion in higher education

The costs of post-mass expansion stretch the fiscal capacity of governments and require publicly-funded institutions to diversify their income sources (Johnstone, 2009). The tendency of governments to fund teaching and research at less than actual costs, alongside the imperative for institutions to increase their operating efficiencies, raises risks to quality as indicated by increasing student teacher ratios and class sizes.¹⁰

Higher education institutions face new challenges in balancing their growing reliance on commercial and competitive sources of income, for research as well as teaching, with the preservation of quality and ethics. There are episodic suggestions, for instance, from academics and others, of pressure to limit research methods or the publication of results for commercially-sponsored research, and to award higher grades to fee-paying students than their performance merits. The ventilation of internal discontent, whether with purported university managerialism or educational commodification, may represent a form of protest by a generation of academics at unease with the course of change, but it can resonate in the public mind amid growing concern with the apparent incidence of plagiarism, and unfamiliarity with new methods of continuous and on-line assessment and the increasing use of group learning activities (James, 2003). Additionally, changing patterns of 'student engagement' in university life, including reduced campus attendance and longer hours in employment, raise questions about depth of learning (James et al. 2010; Krause, 2005; Long & Hayden, 2001).

Interestingly, in Australia, the main available indicators—surveys of student and graduate satisfaction—do not reveal diminishing quality over the last decade. If anything, they suggest that notwithstanding higher participation, erosion of the funding rate per student, a blow-out in student/staff ratios, and the increased use of casual and sessional teaching staff, higher education quality is being sustained at reasonably acceptable levels (Bradley et al., 2008). Or is it that apparent stability of student satisfaction in the context of declining inputs reflects diminishing quality through less stretch for students and easier marking by teachers? Or is there some amount of gaming behaviour on the part of institutions, such as through manipulating student responses, especially on the items that count for performance funding allocations? Such questions highlight the need to see indicators as signals for further searching, as partial measures, or even proxies or substitutes for 'real' matters of interest which cannot be directly observed.

¹⁰ In Australia, average university student/staff ratios have risen from 12 to 1 in 1988 to 20 to 1 in 2008. Interestingly, over the same period average secondary school student/teacher ratios have fallen from 19:1 to 12 to 1.

2.4 Concerns about graduate preparedness for changing job requirements

Questions typically arise about the effectiveness and responsiveness of advanced human capital formation where there are evident imbalances between graduate supply and labour market demand. The basic market test of higher education quality is the ability of graduates to be gainfully employed or self-employed. A higher education system can be assumed to be functioning without serious problems when graduates have reasonably high rates of employment and low rates of unemployment and under-employment, and when they command a salary premium over non-graduates in the labour market. In respect of higher education graduates, Australia has no major problems in this regard. Nor has Britain, whereas the US has major problems (US Department of Education, 2006). In Australia, for instance, there may be some apparent imbalances in the production of graduates by field of education relative to short-term occupational demand, whether an under-supply of engineers or an over-supply of lawyers, or the under-employment of generalist graduates, but the labour market is absorbing graduate output, and higher education graduate earnings continue to yield a positive net private return on investment.¹¹

The basic market test of higher education quality is the ability of graduates to be gainfully employed or self-employed.

However, labour market outcomes, whilst an indicator of educational effectiveness, are not necessarily reflections of graduate capabilities. Graduate employment is affected by factors beyond the control of higher education institutions. A body of research suggests that employment rates depend not merely on higher education learning outcomes, but on a variety of factors including prevailing labour market conditions, socio-economic factors, prior learning, the subject studied, social networks, and cost of education (Nusche, 2008). According to the job-market signalling model (Spence, 1973) employers seek graduates from the more selective institutions, because they assume that those institutions have a higher proportion of students of high ability. In this model, the educational quality of the higher education institution is less relevant to the employer than its role in sorting talent and conveying information about the relative abilities of job applicants (Nusche, 2008). Hence success in the labour market may reflect reputational factors and not simply individual merit or the success of a nation's system of human capital formation. Some are interested in revealing factors behind the reputational image of particular institutions which may otherwise charge a price premium for services they do not deliver (Carey, 2010).

Nevertheless, one would expect employers to be discerning about their labour costs. If the signals from the selective institutions fail to underpin employer expectations of graduate productivity, that should become apparent in the clearance rates and salary premiums of graduates.

So why are graduate returns to investment, whether employment outcomes or incomes, no longer regarded as an appropriate measure of the value of a degree? Why are 'direct measures of learning outcomes', which must also be proxies, because they can only sample what someone knows or can do, preferenced over other indicators?

¹¹ Private rates of return to a bachelor degree have been estimated by the Australian Bureau of Statistics, from population census data over five year intervals from 1981 to 2006. The estimates compared income flows over 47 years lifetime span for persons with a bachelor's degree and those without any post-school qualification. Whereas in 1981 the expected rate was 13.1% for males and 18.0% for females, by 2006, the expected rates had risen to 19.6% for males and 19.0% for females, with a fall in 2006 to 15.3% for males and 17.3% for females. The fall in 2006 reflected the lower general level of unemployment in the economy. These returns to human capital investment compare more than favourably with investment in tradable shares (ABS, 2010). Graduate Careers Australia provides annual reports on the destinations and starting salaries of university graduates by level and field of study. www.graduatecareers.com.au.

Without pointers to clearance bottlenecks or labour supply shortages in critical areas, there is no obviously compelling case for governments to intervene in such processes. If, indeed, there is an apparent graduate under-utilisation, the most useful point of action may be at the level of the employing enterprises which are not making full use of the talent available to them.

2.4.1 Employability skills

In Australia, surveys of employer satisfaction with graduates tend to suggest some level of concern about an over-emphasis on content knowledge and theory and the underdevelopment of 'employability skills' (see Box 6). The former can be ephemeral and location-specific. The latter can include communication, problem solving, team-work and attitudinal and behavioural characteristics, such as 'self-management' (e.g. punctuality and cleanliness). The survey results tend to vary according to employer type, industry sector, enterprise size, and occupational group, and different perceptions may be gleaned from chief executives than from human resource managers (ACNielsen, 2000). A recent study of 800 employers in Britain by the recruiting company Reed, has found that the key qualities employers look for in a candidate are "honesty and trustworthiness, followed by commitment, adaptability and accountability" (Attwood, 2010). Skills, or measured learning outcomes, are further down the list of desired attributes.

Without pointers to clearance bottlenecks or labour supply shortages in critical areas, there is no obviously compelling case for governments to intervene in such processes.

...the key qualities employers look for in a candidate are "honesty and trustworthiness, followed by commitment, adaptability and accountability."

Box 6. Employability Skills

The Employability Skills Framework, developed by the Australian Chamber of Commerce and Industry (ACCI) and the Business Council of Australia (BCA) and published in *Employability skills for the future* (DEST 2002), focused on "skills required not only to gain employment but also to progress within an enterprise so as to achieve one's potential and contribute successfully to enterprise strategic directions".

AACI/BCA proposed eight employability skills from higher education:

- Communication that contributes to productive and harmonious relations between employees and customers.
- Teamwork that contributes to productive working relationships and outcomes.
- Problem solving that contributes to productive outcomes.
- Initiative and enterprise that contributes to innovative outcomes.
- Planning and organising that contribute to long-term and short-term strategic planning.
- Self-management that contributes to employee satisfaction and growth.
- Learning that contributes to ongoing improvement and expansion in employee and company operations and outcomes.
- Technology that contributes to effective execution of tasks.

Existing generic tools, such as the Graduate Skills Assessment (GSA) and the Employability Skills Profiler (ESP) are not favoured by universities in their current form. The GSA is seen as costly to the university and too generic to be of value; academic staff queried the appropriateness of written or online instruments to assess practical and interpersonal skills. International literature shows support for generic skills testing instruments, particularly

those that allow for contextualisation of the generic skill to the discipline or professional area. The ESP was largely unknown in higher education and broad perceptions were that it was more suited to non-professional job seekers. There was however support for students being offered some form of self-assessment, so that they could better manage their own learning and development.

Precision Consultancy (2007). *Graduate Employability Skills*. Prepared for the Business, Industry and Higher Education Collaboration Council. Melbourne.

To some extent, employer advocacy of enhanced employability skills represents an interest in shifting some of the costs of enterprise training onto the education system whether publicly or privately financed. Whereas some (mostly large) employers look for talent on the basis of signalling, as discussed earlier, and are willing to invest in developing graduates for firm-specific roles, others appear to expect graduates to be work-ready immediately. However, public involvement can be justified, in the absence of incentives for firms to invest in training beyond their immediate needs, for helping some groups of people to become more 'job ready' for labour market entry, and for helping those in the workforce with low levels of education benefit from training (Field et al., 2009).

Nevertheless, some caution needs to be exercised in policy terms to avoid higher education being too instrumentally narrowed in the quest for 'relevance'. The recently announced approach in Britain focuses on the 'activities' offered by higher education institutions, whether embedded in structured learning or extra-curricular, to enhance graduate employability as distinct from their employment outcomes (see Box 7).

Box 7. Employability statements in Britain

"HEFCE is working with the Department for Business, Innovation and Skills and key partners to help improve the presentation of information on employability support for students entering HE in 2011-12. This is part of a longer-term review of public information that is already under way. It is expected to consider employability and employment information including Teaching Quality Information (TQI) and the National Student Survey (NSS). The review is part of further development of the quality assurance system and will go out for consultation, jointly with Universities UK and GuildHE, in autumn 2010.

The employability statement is intended to be a short summary of what universities and colleges offer to their students to support their employability and their transition into employment and beyond. Statements are not intended to duplicate existing information that many universities already provide through their web-sites, but to make this easily comparable and accessible to students and to strengthen its profile and visibility.

Universities and colleges are asked to publish their statement in the commentary section of the Unistats web-site, and in their own communication channels (such as web-site and in future prospectuses). As we are currently undertaking a comprehensive review of employment data, statements should focus on the support available to students rather than outcomes data on employment. Data on employment outcomes are already available at detailed subject level on the Unistats web-site.

Statements should address the four priority areas identified in the accompanying notes (careers, work experience, curriculum support and accreditation), but the examples given in the guidance are not prescriptive. Institutions that have distinctive or innovative approaches to supporting employability are encouraged to reflect these in their statements."

HEFCE (2010).

On the available evidence for countries like Australia and Britain, the kind of higher education reform agenda being envisaged by OECD ministers and others needs to be justified on grounds other than problems with the labour market fitness of graduates, or at least the nature of any such problems needs to be specified.

What kinds of problems are evident? Are there perceived deficiencies in content knowledge (e.g. that doctors have insufficient knowledge of anatomy—and if, so, how valid is such a view for contemporary and future practitioners able to access information and assistance in the digital era)? How important is content knowledge when its shelf-life is so short in so many fields? Who should decide what is the most important content knowledge? Are there deficiencies in the technical skills of graduates (e.g. social science graduates lack adequate quantitative skills)? Are there deficiencies in other areas of graduate preparedness? If so, are they the ‘employability skills’ (e.g. problem solving, communications, self-management or interpersonal skills)? Or are they broader capabilities associated with knowledge domains, e.g. reasoning, analysis, critical thinking? Or are they more personal traits, such as honesty and commitment, of the kind that are developed more through education than training?

2.4.2 The changing nature of work

In Australia as elsewhere, employment is ‘hollowing out’, with the steady decline of ‘blue collar jobs’ over several decades, and widening income disparities, which may reflect “changes in the occupational distribution of employment—the shrinking middle—rather than changes in relative wages” (Lewis, 2008). Twenty-first century jobs, particularly though not exclusively in areas of occupational growth, are requiring more sophisticated understandings and abilities on the part of new entrants to the labour market as well as existing workers. Applications of enlarged and faster computing capacity, alongside Internet and mobile communications, and the spread of cross-disciplinary approaches to problem solving, are creating new formations of capability (= people + infrastructure + networks) underpinning enterprise competitiveness.

There is a contrary view (Lazerson, 2010; Wolf, 2002) that vocationally-oriented education has been over-sold as a driver of economic growth and prosperity, and that governments exaggerate the pace of change and the proportion of jobs requiring higher qualifications. Lazerson’s claim that “vocationalism undermines learning itself” expresses a concern that the intrinsic value of learning is lost when “students become highly credentialist in the sense that they view the grades and credits they accumulate as the most essential aspect of education” (Lazerson, 2010). Additionally, a challenge for vocational education is to prepare people for jobs that do not yet exist and which we may not be able to imagine.

Similarly, the setting of targets for educational attainment, such as the Leitch Review targets in the UK, copied by the Bradley Review in Australia, are seen to represent social pressures or political expediency rather than economic needs:

“It is hard to avoid the pessimistic conclusion that the targets may be unrealistic and unachievable, in part because they do not take account of differences in skills needs in regions across the country. In relation to 2020, we note that Leitch set out in his report his analysis of the consequences of failing to meet the challenge in full. More immediately, there is the danger that skills policy might be distorted to meet the targets at the expense of programmes and delivery mechanisms that better reflect what employers and individuals really need” (House of Commons Innovation, Universities, Science and Skills Committee, 2009b).

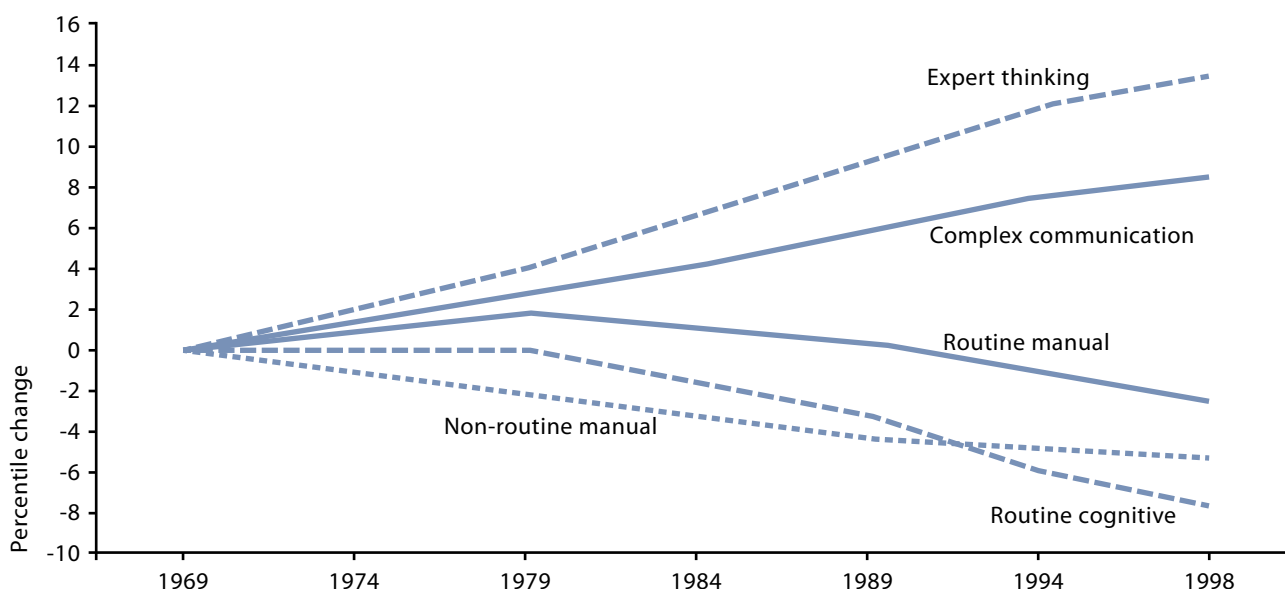
Nevertheless, the OECD, the World Bank and other agencies, with a focus on national economic competitiveness, are giving attention to future workforce capabilities. An influential contribution to thinking is the work of Levy and Murnane (2004) who see computers enhancing productivity in many jobs even as they eliminate other jobs—both directly and by sending work to other countries. They see the impact of computerisation on work to be “hollowing out the occupational distribution” (Levy & Murnane, 2004). They argue that “the future belongs to the people who excel at expert thinking (solving problems for which there are no rules-based solutions) and complex communication (interacting with people to acquire information, understand what that information means and persuade others of its implications for action)” (see Figure 1).

Hence, at greatest risk are the jobs that can be expressed in programmable rules—blue collar, clerical, and similar work that requires moderate skills and used to pay middle-class wages. The result is a polarised job market: good jobs will increasingly require expert thinking and complex communication; whereas jobs that do not require these tasks will not pay a living wage. Preparing the work force to deal with this reality presents a formidable challenge. Levy and Murnane propose a vision of “standards-based education”—setting clear goals for student progress, standardising instruction to meet these goals, and measuring student progress toward these goals “frequently enough to make sure they are attained” (Levy and Murnane, 2004).

*...at greatest risk
are the jobs that
can be expressed in
programmable rules ...*

Extrapolating from these apparent trends, the OECD Education Directorate has suggested that the demand for skills sets in jobs has changed, with a move from ‘Narrow Routine Manual’ and ‘Narrow Routine Cognitive’ jobs towards jobs that require ‘Non Routine Analytic’ skills and ‘Non Routine Interactive’ jobs. Important skills sets for education to develop include: the extrapolation of knowledge; the resolution of conflicts; collaboration and orchestration; explanation; and the synthesis of ideas and methods (Schleicher, 2009). This view emerges from a classification of new functions emerging in a wired-up world of instantaneous information from multiple sources. Filters and “explainers” become more important as the content we can search and access becomes larger (Yelland, 2010). “Localisers” are seen to be necessary for translating global knowledge to local contexts. “Collaborators and orchestrators” are needed in order to bring coordination and management to companies in a complicated, globalised world. As complex problem solving involves multidisciplinary contributions, “synthesizers” are seen to be needed for integrating disparate parts of the solution. “Versatilists” are seen to be needed to apply depth of skills to a progressively widening scope of situations. People with versatile skills are distinguished from “specialists” with deep skills and expertise, but narrow scope beyond their domain, and from “generalists” with shallow skills but broader scope. “Versatilists” have a capacity to gain new competences, assume new roles, and constantly adapt, learn and grow (Schleicher, 2009). It is argued that systems that measure the ability to develop these skills are now needed rather than “Easy to Teach–Easy to Test” systems (Schleicher, 2009).

Figure 1. Economy-wide measures of routine and non-routine task input, United States, 1969-98 (1969 = 0)



Reproduced from Levy & Murnane (2004). Figure 3.5.

Note: Each trend reflects changes in the numbers of people employed in occupations emphasising that task.

These perspectives come together in a focus on “adaptive expertise” (Bransford et al, 2006) as a goal of school education: “the ability to apply meaningfully-learned knowledge and skills flexibly and creatively in different situations” (de Corte, 2010), as opposed to ‘routine expertise’—being able to complete typical school tasks quickly and accurately but without understanding. The development of adaptive competence in a domain is seen to require the acquisition of several cognitive, affective and motivational components: “a well-organised and flexibly accessible domain-specific knowledge base”; “heuristics methods” (search strategies for problem analysis), “meta-knowledge” about one’s cognitive processes and motivations, self-regulatory skills, and positive beliefs about oneself (de Corte, 2010). This educational goal suggests a new balance in learning processes, between “structure and guidance by the teacher”, and more self-directed “action learning”, and self-determined “experiential learning” (de Corte, 2010).

This view challenges aspects of conventional approaches to curriculum, teaching and assessment not only in schools. It also challenges narrow competency-based approaches to vocational education which provide no room for broader capability development and knowledge foundations. And it challenges approaches to higher education that are both academically narrow, in terms of exposure to disciplinary perspectives and early specialisation, and experientially narrow, in terms of learning methods.

Some regard these developments in the character of work giving rise to fundamental rethinking of traditional boundaries between disciplinary knowledge and performative skills, and between academic and vocational sectors. It has been suggested, for instance, that a focus on learning outcomes through national and international qualifications frameworks, quality assurance and standards-referenced performance accountability will “lay the ground for a competence-based common language across countries and sectors, as well as between education, training and the labour market” (Quintin, 2010). However, this is a hotly contested view, and it would be dangerous to adopt it without scrutiny as a basis for national reform.

The balance of breadth and depth at higher levels of learning is not a simple or generalisable matter. Arguably, the higher the level of specialisation the lower the substitutability of labour (Lewis, 2008), although what matters most for adaptability is grounding in the ways of knowing, whatever the field (Rotherham & Willingham, 2010). The earlier functional specialisation of higher education systems, involving a demarcation of institutional types, can be seen to reflect the needs of occupationally segmented labour markets, particularly when skilled workers were required for clearly specialised roles (Bleiklie, 2007). Demand for specialised graduates continues in traditional professional fields (e.g. medicine, engineering), in new graduate occupations (e.g. paramedical, marketing), and in niche areas of specialisation (e.g. sports management and hospitality) within parts of the services sector (De Weert, 2009). In areas such scientific and medical services and research, there is a need for high-order technical skills as well as process skills; but only the latter are fungible.

*...the higher the level
of specialisation the
lower the substitutability
of labour...*

As Lauder (2009) has noted in reflecting on Muller’s (Muller, 2009) account of the formation of the ‘fault lines’ of liberal and practically-useful knowledge which, when mapped onto the changing division of labour, give rise to the routes between education and the labour market, assumptions about transferability of skills at all levels are arguable:

“...the idea that there is a generic set of knowledge structures acquired through education, as policy-makers assume, is simply false because the more specialised a discipline becomes the less transferable its understandings and skills” (Lauder, 2009).

Specialisation not only permits deeper mastery and greater productivity, it also plays an important social function, for while the knowledge and skills needed for a particular profession are transmissible they are not transferable:

"This non-transferability of expertise is the balance wheel of professionalized economies: it prevents excessive claims to authority being made by well-educated people. It provides a check to the elitism inherent in any market-circumventing system. Professionalism is a way of using smart people productively without giving them too much social power" (Menand, 2010).

The recognition of specialisation is also important for safeguarding service integrity. For instance, in professional practice it is necessary to prevent lay claims upon professionals in one field (e.g. social welfare case workers) to exercise judgements that can only be exercised by professionals of other fields (e.g. law, psychology, mental health), although this does not prevent them from questioning such judgments.

Specialisations are themselves subject to new challenges of balancing breadth and depth of knowledge and integrating new understandings. Sullivan & Rosin (2008) contend that "today's students will be called upon to meet the practical and professional challenges that await them with insight, technical know-how and discerning moral commitment" (Sullivan & Rosin, 2008). They see the need for university education to focus on an integrated set of capabilities, which they call "practical reasoning":

"The educational goal of practical reasoning is the formation of persons who think and act through a back and forth dialogue between analytical thought and ongoing constitution of meaning" (Sullivan & Rosin, 2008).

A New Agenda for Higher Education sets out ways of integrating practices from professional education that engage students in practice and reflection, with teaching practices from the liberal arts which provide sources for the formation of competent and responsible persons: "By reconnecting analytic insight with practical judgment and action, students learn how best to enter situations, how to sustain aims amid changing circumstances, and how to frame and reframe purposes while seeking with others a common good" (Sullivan & Rosin, 2008). An important inference from the work of Sullivan and Rosin is a corrective to the popular view that focuses on the measurement of generic attributes of higher education graduates, such as critical thinking and problem solving, as stand-alone skills:

"The academy is not only called to break apart the world into its constitutive relations and causes through critical thinking... We mistake analysis and critical thinking, which are disintegrating ends, for judgement and responsibility, which are integrating and consummating ends... Our students will be called to take up concrete places and stances in the lives of others. They must learn to discern the practical salience of academic insight through integrative acts of responsible judgement in the world. What critical thinking pulls apart, responsible judgement must re-connect. The calling of higher education does not end with theory and interpretation. It culminates in the active formation of new narratives of individual and collective identity and responsibility" (Sullivan & Rosin, 2008).

Additionally, the task of preparing graduates as citizens of the world involves rethinking curriculum goals and design. Future higher education graduates need to be able to deal with complex challenges facing the world and have the requisite skills and understandings to exercise global options for gaining employment anywhere they choose. Ramsden (2008) sees the need to improve the preparation of future graduates, including through curriculum overhaul: "we require curricula that are transdisciplinary, that extend students to their limits, that develop skills of inquiry and research, and that are imbued with international perspectives". Ramsden suggests that only such qualities will ensure graduates who are able to "embrace complexity, climate change, different forms of citizenship, and different ways of understanding individuality and cooperation" (Ramsden, 2008).

The main inferences from the above considerations, for the purposes of this paper, are (i) graduates need the ability to apply meaningfully-learned knowledge and skills flexibly and creatively in new situations (De Corte, 2010); (ii) more sophisticated systems are needed for developing and assessing these abilities (Schleicher, 2009); understandings and skills become less transferable the more specialised knowledge becomes (Lauder, 2009); and generic abilities like critical thinking and problem solving are integrated with rather than separable from practical reasoning (Sullivan & Rosin, 2008). These observations challenge conventional assumptions of public policy in areas such as national qualifications frameworks and standardised generic skills testing.

2.5 Disaffection with conventional quality assurance and performance reporting

A further impetus to reform is a loss of confidence in established quality assurance regimens, notwithstanding the comprehensive and sophisticated nature of arrangements in many countries. There is a widespread view, across different countries and stakeholder groups, and across party political lines, that the widely adopted 'quality assurance' paradigm is inadequate:

"Public and governmental disillusionment with quality assurance processes in countries such as the UK are leading to fundamental changes in the way that quality is assessed and assured" (Williams, 2010).

From a public policy perspective, quality assurance in higher education reflects concerns for public accountability and consumer protection. The public accountability purpose can be narrowly or widely cast. In its narrow expression it is concerned with value for money through a reckoning of cost-effective use of public resources, which may involve accounting for use of inputs or the performance of activities or the achievement of results or some combination of inputs, processes and outputs. The choice of focus mainly reflects the nature of the funding arrangements for general-purpose (block-funded activities) or specific-purpose (stipulated activities). Generally, the greater the level of discretion given to institutions over the use of inputs the greater the focus on reporting about delivery of outputs. In its broad expression it may be concerned with institutional responsiveness to societal needs, and in competitive environments, some demonstration of responsibilities to safeguard public good interests. Typically these wider concerns are reported by institutions in terms of activities undertaken and impacts estimated.

...the greater the level of discretion given to institutions over the use of inputs the greater the focus on reporting about delivery of outputs.

The consumer protection purpose can also address general matters of value for money for student purchasers but in practice it is concerned with avoiding students being exploited by unscrupulous providers or issued with bogus credentials. This purpose has typically involved a focus on threshold requirements for bona fide provider operation, and safety-net provisions for students in the event of failure by a provider, such as continuity of study options with another provider or fee refunds. Students may also claim redress in circumstances where they believe they have been misled by a provider or where they believe a provider fails to deliver what it promises in its prospectus or marketing materials. Action can include litigation or settlement between parties. Typically such cases relate to activities performed by the provider; it would be more difficult for a student to claim for lower than anticipated learning achievement when the student is an agent of the learning.

Four particular areas of disaffection with the application of this model to higher education may be discerned: (i) the failure of quality assurance mechanisms to rid the system of rogue providers; (ii) a burdensome process for institutions that induces compliance and is subject to gaming; (iii) the tendency of quality assurance to reduce diversity and quality; and (iv) deficiencies in the quality of information available to students, employers and others. There are different policy implications for each area of concern. The first concern requires tighter registration and more regular re-registration of providers. The second set of concerns requires replacement or modification of the current quality audit model. The third set of concerns requires more comprehensive, reliable and regular information provision.

2.5.1 The failure of quality assurance mechanisms to rid the system of rogue providers

Despite the burden of registration and QA processes, in several countries they have not succeeded in weeding out the poor performing institutions. The failure results from a mix of factors, including: breakdowns in parts of the supply chain which are not subject to national registration and auditing, such as foreign agents recruiting international students; breakdowns in relations between parties to a service provider alliance; inadequate screening for initial registration; and breakdowns in the scrutiny of ongoing provider compliance with initial registration conditions.

In Australia, for instance, several institutions that were initially registered to operate were subsequently found to be seriously deficient in terms of financial solvency or staffing adequacy or probity. The major problems were identified in the Vocational Education and Training sector servicing the market for international fee-paying students, in a context where the Australian Government's immigration policy awarded bonus points for Australian qualifications towards permanent residency eligibility. However, as some universities were caught up in aspects of that business, including one or two that had been subject to quality audit and continue to operate, the policy solution could not be confined to one class of provider.

The committee of review of Australian Higher Education regarded current arrangements for quality assurance to be "complex, fragmented and inefficient". (Bradley et al 2008). However, its concerns about complexity and fragmentation refer to differences across tertiary sub-sectors (Vocational Education and Training, and Higher Education) and State & Territory jurisdictions, primarily for provider accreditation. In those areas, of course, attention must be given to inputs and processes, such as sufficient qualified teaching staff, adequate facilities, financial sustainability and appropriate governance. Reliance on outcomes alone would permit providers to operate without meeting any threshold requirements ahead of graduating a class of students. Hence, a focus on outcomes relates to policy purposes other than initial institutional licensing, although it could have a role in assessment for subsequent re-registration. Nevertheless, the matter requires attention, and not only within national jurisdictions.

In the US, a recent Government Accountability Office (GAO) "secret shopper" investigation of recruiting practices at 15 for-profit campuses has identified "fraudulent, deceptive or otherwise questionable marketing practices" at all 15 institutions, and inducements to commit fraud on the Free Application for Federal Student Aid at four institutions. The report formed the backdrop to the 4 August 2010 hearings of the Senate Health, Education, Labor and Pensions Committee on the "student recruitment experience" at for-profit colleges. Committee chair, Senator Harkin (Democrat, Iowa) outlined plans to hold more hearings on the sector, to collect broad sets of information from for-profit colleges, and to begin drafting legislation aimed at cleaning up the sector. The US Department of Education is expected to publish regulations intended to guard against abuse of the Title IV financial aid program by November. However, the Committee chair expressed reservations about the sufficiency of a change to regulations:

"I believe and I think where we're headed is very clear cut legislation that can't be overturned by another administration, that can't put in 'safe harbors' and say it complies. Education is too important for the future of this country," he said. "Facing the budget problems we have in the next 10 years, we just can't permit more and more of the taxpayers' dollars that are supposed to go for education and quality education...to be going to pay shareholders or private investors. GAO's findings make it disturbingly clear that abuses in for-profit recruiting are not limited to a few rogue recruiters or even a few schools with lax oversight. The evidence was collected from some of the nation's largest for-profit colleges, including the University of Phoenix and Kaplan College" (Harkin reported in Epstein, 2010).

The large for-profits involved in the GAO investigations are operating on a global scale, at times in alliances with reputable universities as 'pathway' intermediaries, and at times aggressively buying out other providers, including "Hoovering up institutions in the UK and Australia" (Roger King reported in Shepherd, 2008).

2.5.2 The process orientation of quality assurance in higher education

It is understandable that quality assurance (QA) in higher education has been process oriented. It is the organisation of inputs and processes that obtains the intended results and for which institutions can be held accountable for the things they do that make a difference. The QA perspective is one where output problems can be rectified through process improvement. Additionally, outputs and outcomes in higher education reflect a wider range of direct and indirect influences, and their qualitative assessment necessarily requires the exercise of professional judgement. The current QA model reflects a view that the onus of professional responsibility for determining, sustaining and attesting to academic standards should lie with the professional academic community. The QA audit function is seen as an independent verification that a university is applying purposeful ways and means to realise the aims it has set for itself.

In this vein the Australian Universities Quality Agency (AUQA), is required to report on the 'relative standards of the Australian higher education system' but "its focus on the processes of institutional level quality assurance does not provide for comment on standards across institutions or within fields of study... As an external body to the academy, AUQA is required to look at the ways in which institutions set and assess standards including moderation methods but it does not have a role in the ongoing and sustained process of determining and monitoring standards at system level "(James, McInnis & Devlin, 2002). Nor should it.

The QA audit function is seen as an independent verification that a university is applying purposeful ways and means to realise the aims it has set for itself.

A preoccupation with QA process has been a concern for universities worried about compliance costs. It is not so much whether processes ought to be audited but how. The concerns are heightened when quality audits inspect areas of an institution's operations several steps removed from the delivery of higher education services, without prior assessment of risks. For their part, the quality auditors claim to look for systematic institutional planning, organisation, resourcing and evaluation deliberately designed to maximise educational effectiveness. But the relationships are not linear, and apparently well-designed processes do not necessarily lead to good learning outcomes.

At its worst, external quality auditing leads to a checklist approach to even-handed routinisation. This tendency has been observed among professional auditors and academic peer reviewers, even when there is a focus on the assessment of learning outcomes (Kushimoto, 2009). When reviewers are assigned a largely technical, standards-referenced role they tend to focus on the quantifiable indicators, putting their qualitative judgements to one side (Langfeldt et al. 2009). For this reason, paradoxically, an expansion of indicators and benchmarks, reflecting the interests of multiple stakeholders, could reduce attention to system diversity and excellence (Langfeldt et al. 2009). Nor is it clear that for all the evaluative activity there is greater public transparency of higher education quality:

"The promotion of quality assessment is often justified as a necessity to make higher education socially accountable. However, it is not clear if the current practices are making it more transparent to society or to bureaucratic demands. Moreover, many institutions wonder whether the level of complexity of current evaluation mechanisms are actually making institutional activities and their results more apparent to HE stakeholders and to society in general. There are fears that quality systems become entangled in a bureaucratic web of jargon, procedures and indicators that are neither intelligible nor useful for many of those individuals that government and government agencies are supposed to represent" (Teixeira, 2010).

2.5.3 The tendency of quality assurance to reduce diversity and quality

The prevailing approach to quality assurance emerged from an industry-based context, geared to a manufacturing model of minimising defects in outputs, reducing rework, and improving the efficiency of production processes and organisation (Deming, 1982). Quality assurance was introduced more as a device for regulating the production process than as a check on output quality (Morley 2003) precisely because the processes were designed to produce outputs of uniform and consistent quality. The approach has questionable direct applicability to higher education, whose graduates are not expected to be identical, which is a less tangible and experience-based process, and where the learners are not simply consumers but are also active participants or co-producers, such that the effectiveness of the experience depends on the interaction of institutional offerings and student efforts. Indeed, the quality of higher education as a 'customer-input technology' derives in large part from the contributions that students make to the learning of others, such as through the probing questions they ask and the creative insights they offer (Rothchilds & White, 1995).

Nevertheless, the 'QA industry' has penetrated services worldwide, mainly providing a source of benchmarking information for provider performance improvement, and offering some guidance to consumers that processes comply with accepted industry standards. Its primary function has been to validate processes, working from the view that the suitability of a service is a function of how well a provider delivers to its stated undertakings in meeting the needs and expectations of customers.

The QA approach leads to auditing bodies applying similar criteria to different institutions and the institutions copying the practices that auditors commend. Thus it tends to recycle sameness. It may raise up the performance of some at the bottom to what is regarded as 'good practice' but it does nothing to encourage those at the top to excel. Hence the homogenising tendencies of QA are inimical to the systemic outcomes that are often proclaimed for higher education—diversification and the pursuit of excellence.

The QA approach also tends to generate process models and procedural codification. Inter-institutional collaboration in education and research is increasingly important, on a national and international basis, for addressing complex problems and opening opportunities for learning. The glue that holds collaborative relations together is trust based on confidence in shared values. In the academic sphere trust is built on integrity, reliability and quality as judged by peers. Over-codification of procedures by QA bodies, such as for alliance formation, can act to break down relations of trust.

The QA approach leads to auditing bodies applying similar criteria to different institutions and the institutions copying the practices that auditors commend. Thus it tends to recycle sameness.

2.6 The inadequacy of information available to students and others

In contemporary markets for higher education services, improved information for students as customers is necessary to help them avoid being inveigled. In this context prospective students seek assurance and guidance: assurance about the bona fides of providers, and guidance about the suitability of providers, particularly in relation to the fields of study of interest to them, and the orientations of programs that suit their circumstances and motivations. These are two very different information needs.

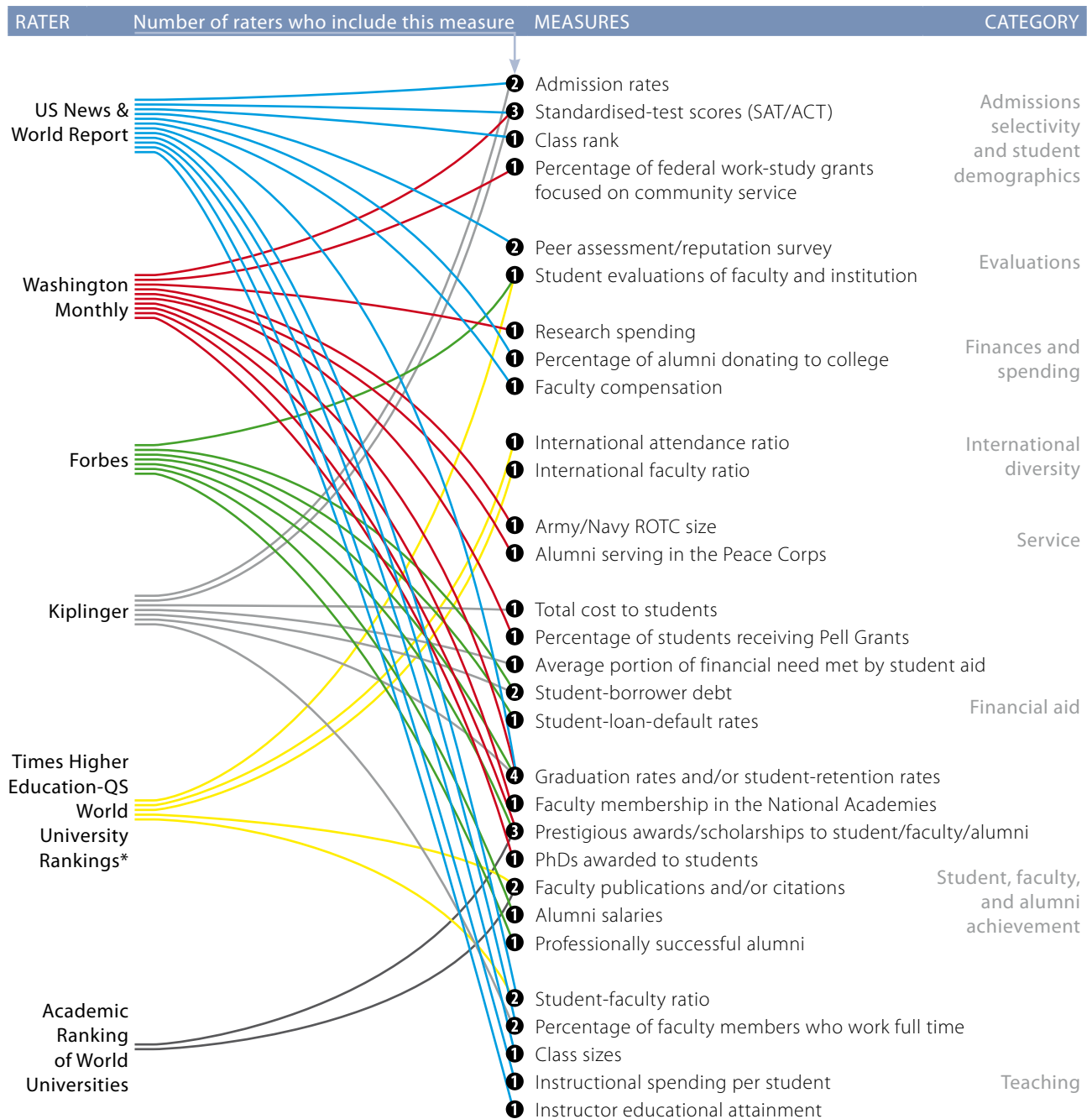
With regard to provider bona fides, the approaches of long-established public universities are not seen to be transferable to new for-profit providers or even to the commercial activities of some public universities. Hence there is seen to be a need for a transparent, national mechanism which assures a common floor level of acceptable threshold standards of educational qualifications across all higher education providers. It is not clear whether such thresholds can be set at an agreed level of appropriateness or whether they can be implemented at an acceptable level of effort.

However, with regard to information about appropriate study options, the prospective learner's basic need is not so much to see what providers have in common, or even how they compare against common benchmarks, but rather to see how the available provider offerings differ. Students seek various forms of information, including information about course offerings, admission requirements, institutional facilities, teaching staff, student mix, social and cultural opportunities, tuition and other prices, and indicators of graduate destinations and satisfaction.

Annual commercial guides and university web sites offer such information, by field and place of study. In August 2010, *The Chronicle of Higher Education* began a series of special 'measuring stick' reports on higher education quality, pointing to the absence of information about "what colleges do directly for their students—what knowledge, skills, job prospects and habits of mind I am likely to acquire (at College X) rather than College Y or if I hadn't gone to college at all" (Glenn, 2010). It is noted that the six available ratings (see chart below) do not include such information, and concluded that "colleges have been able to evade accountability for the quality of their most important missions" (Glenn, 2010):

"The lines below connect raters to each of the measures they take into account. Notice how few measures are shared by two or more raters. That indicates a lack of agreement among them on what defines quality. Much of the emphasis is on 'input measures' such as student selectivity, faculty-student ratio, and retention of freshmen. Except for graduation rates, almost no 'outcome measures,' such as whether a student comes out prepared to succeed in the workforce, are used" (Richards & Coddington, 2010).

Chart 1: Indicators used by commercial raters



* Published in a partnership between these two organisations through 2009.

Note: In some cases, separate measures shown here are combined to create a single variable used for ranking colleges. In some cases, separate measures shown here are combined to create a single variable that is assigned its own weight.

Additionally, there is a tendency to mistrust the marketing claims of institutions in competitive environments, where they can all produce indicators putting them ahead of others on one dimension or another. Existing ratings and rankings of higher education institutions and programs, such as the USA News & World Report, the Times Higher Education World University Ranking, QS World University Rankings and the Shanghai Jiao Tong World University Rankings, tend to neglect information on learning outcomes. Instead, they focus on inputs, activities and research outputs, such as resources used, classes taught, and articles published. In some cases, the rankings include purported reputational indicators, typically based on low and/or skewed response rates to opinion surveys.

Such aggregated performance indicators provide no measurement of the degree to which institutions actually develop the knowledge and skills of their students. Hence, these ratings and rankings are considered to be ill-suited to inform governments, students and the general public about teaching and learning quality. But in the absence of comparable learning outcomes assessment across providers, ratings and rankings are widely used as proxies for relative educational quality. They have attracted extensive media attention and they apparently influence public perceptions of institutions and their graduates, despite their deficiencies (Marginson, 2008; Marginson & van der Wende, 2007). Concerns have arisen in Britain over instances of universities pressuring students to give their institutions high scores in the student experience survey, as a means of boosting their rankings in university league tables. The Higher Education Council for England has queried eight universities where students complained that they were encouraged to give high scores for satisfaction with their courses (Kenber & Taylor, 2010).

It is not clear how much students seek information “assuring and demonstrating standards”. There is an absence of evidence in support of the assumption that students and prospective students especially want to know about the absolute or relative quality of learning outcomes on an institutional basis.

Employers may also seek more precise information about learning outcomes to assist in graduate hiring, especially where candidates present with similar academic records from different institutions, or where the sources of job applicants’ qualifications are unfamiliar. However, there is also an absence of evidence about the information that employers seek and use.

Information about learning outcomes seem to be most wanted by governments for accountability purposes, to be satisfied about the value for money of their investments, and to be assured that students are learning effectively. Governments may also seek comparative information about learning quality in order to identify the width of the gap between the best and worst performing institutions in the system, so that they can take steps to improve the latter. But these are different purposes from that of informing students as consumers.

The Spellings Commission, as noted earlier, put particular emphasis on the need for the community to be assured that higher education institutions are effective in producing graduates with the skills they need to find rewarding jobs. Such a concern suggests the need for institutions to (a) indicate how their course objectives and curricula relate to particular opportunities for work and further learning, (b) demonstrate that student attainment meets at least acceptable minimum standards for a given qualification. It does not necessarily imply a need for comparability of differences in learning.

There is an absence of evidence in support of the assumption that students and prospective students especially want to know about the absolute or relative quality of learning outcomes on an institutional basis.

In discussing options for improving institutional accountability and information to guide student choice in the US, following the challenges of the 2006 Spellings Commission and President Obama's 2009 goal of raising postsecondary attainment, Kelly & Aldeman (2010) identify a range of needs. Interestingly, they focus on offerings, expectations and labour market or further education outcomes, but not direct learning outcomes:

"...a system that relies on consumer choice to unleash market accountability needs to give consumers the information they want, the way they want it. And while different people come to college wanting different things, in general all consumers are interested in (a) price, specifically actual out-of-pocket costs, and (b) service, in particular the quality of teaching, expectations for learning and degree attainment, and the likelihood of success in further education and the job market. Consumers also need this information to be provided in a way that facilitates choice, where they can easily compare how institutions differ from one another on important characteristics" (Kelly & Aldeman, 2010).

"Consumers also need this information to be provided in a way that facilitates choice, where they can easily compare how institutions differ from one another on important characteristics."

However, the UK House of Commons select committee on universities expressed particular concern that, in the absence of comparable benchmarks of student learning, there could be systematic discrimination against certain classes of students who obtained their degrees from institutions that others regarded as inferior (House of Commons, 2009). This concern, which also raises issues beyond the threshold level of minimum acceptable attainment, invites consideration of ways and means of improving community understanding of the 'comparability' of attainment within a diverse system. This more complex matter is discussed in Part 4. At this stage it should be noted that it is curious, given the growing complexity and diversity of higher education, and the varying information needs of students, let alone the needs of other stakeholders, 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 (CHERPA-Network, 2010).

These considerations allow us to see several different perspectives on the importance of improving information and transparency. One is primarily a government interest, albeit one shared by employers (the Spellings focus) in effectiveness: how well are students learning? A second is primarily an employer interest, albeit one shared by graduates, (the House of Commons focus on comparability): how much do graduates of one institution have in common with those of another? A third is primarily a student interest, albeit one shared by governments, what information can help students decide about what to study and where to learn?

There is an onus on provider institutions (a) to make clear (i) what they offer—the objectives and learning experiences of programs, and (ii) what they expect of students—by way of readiness and during the program, and (b) to deliver what they promise. Clearly, this kind of information goes beyond the threshold of minimum standards; it is about defining distinctiveness. Accountability in this respect is about institutions demonstrating that they have fulfilled their side of the contract with students and the community.

2.7 Increasing the responsiveness of higher education

The final set of drivers involves various motives for increasing the responsiveness of higher education institutions to the varying needs and circumstances of students and employers. This assertion of demand interests over supply interests can relate to the need for 'adaptable skills' in modern work places, (as discussed at 2.4 above), the democratisation of access for learners, 'seamlessness' in learning pathways and the accumulation of credit, and the 'comparability' agenda.

2.7.1 The 'democratisation of access' agenda

A student-driven approach to higher education policy is predicated on a view that demand should shape supply, that providers of higher education services should be responsive to the varying needs and circumstances of their student clientele rather than provide what suits their own preferences. Lauder (1991), drawing on public choice theory, defined 'provider capture' initially as "the ability of specific groups to insulate themselves from market disciplines and consequences by exerting political pressure", which can be expressed as a form of rent-seeking behaviour by monopolies. Contemporary usage has extended from the economic to the cultural domain, whereby provider capture is seen as "schooling controlled by the people who produce it rather than the people who consume it" (Ward & Egan, 2009). For instance, teacher (or teacher union) resistance to comparing institutions on the basis of student performance on standardised tests, is seen as protecting under-performing providers, denying students and parents the information they need to make informed decisions about obtaining the most cost-effective education, and preventing governments from allocating resources in ways that will achieve the most good.

A particular variant of the attack on 'provider capture' flows from post-Fordist assumptions, an imperative to remove arbitrary obstacles to learning, and a desire to have informally developed skills recognised as part of the formal acquisition of competencies and qualifications (Misko, 2006). European ministers for education and employment, for instance, are reported to be motivated to develop comprehensive national qualifications systems as a reform tool that "can support the implementation of more coherent lifelong learning policies and practices, remove barriers between institutions and sub-systems of education and training (for example, vocational education and training, general education, higher education and adult learning) and facilitate access, transfer and progression" (Grm & Bjornavold, 2010).

Educational suppliers through their control over qualifications and the routes to achieving them can be seen to have captured the market, thereby creating inefficiencies and blockages for learners (Raggat & Williams, 1999). The trend towards learner-centred education and generic criteria for all qualifications is presented as fairer for all and supports widening participation and lifelong learning, on the assumption that anyone can reach the highest levels when freed from the restrictive constraints of institutions. This view has been portrayed in the following terms:

"Qualifications in an 'institutional' model set limits on the range of decisions open to learners once they decide which qualifications they want to obtain. Furthermore, they assume that it is the existing organisation of knowledge as expressed in the curricula of institutions and in the examinations set by professional associations that define the distribution of access, the requirements for entering a programme, and the criteria for being recognised as qualified... Once qualification outcomes are 'freed' from the institutions through which the outcomes are achieved, education systems will become more flexible, qualifications will become more portable and transparent, and recognition and accreditation can be given to informal and work-based learning" (Young, Allais & Raffe 2009).

In Australia, a long-standing, equity-driven campaign has been directed to broadening the criteria and procedures for entry to higher education. The objective is to enable rather than obstruct learning opportunities for the people who have been disadvantaged by the established education system. They need incentives to learn, including recognition of what they have learned despite the system, and attractive opportunities to develop to their potential. A major purpose of the national qualifications framework has been to improve seamlessness across the education and training sectors, primarily through recognition of prior learning, credit transfer and dual sector awards (Keating, 2003).

2.7.3 The 'seamlessness' agenda

Australia's intergovernmental Ministerial Council for Tertiary Education and Employment (MCTEE) agreed at its inaugural meeting in September 2009 that at the heart of its policy agenda will be "creating a tertiary education system that works seamlessly across sectors and with other areas of government delivery to meet the needs of learners and employers" (MCTEE, 2009).

Pathways to tertiary education have become increasingly diverse. Learning pathways for higher education students are facilitated when they are granted some credit for previous tertiary study. However, the passage for many students through the labyrinth of tertiary education has been found to be unpredictable, complicated and difficult, and acts as a deterrent to lifelong learning (Walls & Pardy, 2010).

A study of the vocational education and training systems of Australia, England and Germany, found that Australians are engaged in further education and training throughout their lifetimes to a greater extent than their German and United Kingdom counterparts: "this is especially facilitated by flexible movement through the pathways across secondary, vocational and higher education sectors" (Misko, 2006). Nevertheless, the researcher suggested that Australia could improve the processes for students and employers by adopting a variant of the European diploma supplement:

"European strategies like the certificate supplement, which describes the nature and content of studies undertaken and attached to diplomas and certificates, may also help to improve the transparency of training package qualifications and make it easier for employers, as well as universities, to understand the nature of the learning associated with the qualifications" (Misko, 2006).

Others point to the subjective, arbitrary, and possibly prejudiced, nature of credit transfer decisions (see Box 8) and see the need to create a framework for more structured 'equivalence' tied to credit points in a strengthened Australian Qualifications Framework (AQF):

"Seamless movement from VET to higher education learning contexts will only be achieved through the adaptability of educators, administrators and institutions and by VET providers describing and explaining the detail of the learning content to higher education staff. A strengthening of the AQF may also redress issues of parity in credit transfer and articulation. In future AQF policy the volume of learning required for specific qualifications will be defined and a credit point formula established (Australian Qualifications Framework Council 2009). An initiative such as this would allocate students a certain value of credit for their learning and facilitate student mobility" (Walls & Pardy, 2010).

Such a system could only be automatic, if accumulated credits were recognised to have the same value across all forms of higher education, at all levels and by all providers. Such a model might be

The objective is to enable rather than obstruct learning opportunities for the people who have been disadvantaged by the established education system.

...the passage for many students through the labyrinth of tertiary education has been found to be unpredictable, complicated and difficult...

perceived as conferring entitlements to learners seeking access to further study. However, even at the threshold level of a 'pass' in cognate fields, these assumptions do not necessarily hold, because of the differences in conceptual and contextual approaches to curriculum. Nor do they hold for different fields or for programs where participating students excel beyond 'pass'. As a 'policy' requiring institutional compliance, it could have perverse consequences as discussed later in relation to the AQF Council's proposals for credit transfer.

However, as a 'guideline' enjoining institutions to reverse the present onus of proof, it could facilitate easier access through learning pathways. Within a system where minimum attainment standards are assured, the working assumption, for a given field of study, would be that a student having passed a diploma ought to have access to a degree program, and should not be required to repeat learning what they already know. Rather than the student having to prove how s/he satisfies a university's entrance requirements for a given program, the university would have to demonstrate why the student would be unable or unlikely to benefit from admission. The university would have to show where and how, for instance, its program requires a different level of readiness than a transferring learner can demonstrate. A more comprehensive set of AQF descriptors, which more clearly defined the nature of learning expectations for different qualification types, could help different institutions improve their credit transfer assessments. It would also necessarily give rise to institutions developing and publishing more explicit criteria for differentiating qualitatively between programs whose standards are claimed to be above the minimum threshold.

Box 8. Crediting vocational education and training for learner mobility

Institutional arrangements determine credit transfer and articulation between providers. According to Harris, Rainey and Sumner (2006), the complexities of these arrangements are better described as 'crazy paving' than as a seamless pathway, and the causes of this are as much cultural as they are systems weaknesses. The data suggest that many credit transfer determinations are based on individual subjective judgments of the learning achieved and, in particular, relate to the differing positions of those involved in granting credit. The hierarchy of the Australian tertiary education system, reinforced in policy structures such as the AQF, is another cultural consideration. Equivalence of content and pedagogy can only be established if perceived hierarchies and vested interests are set aside.

We find further complexity in the blurring, in some instances, of the sectoral boundaries between VET and higher education. This places the educational sector as secondary to the qualification itself, with learner mobility achieved purely through the attainment of a higher-level qualification, irrespective of whether it is from a VET or higher education institution. In addition, qualifications are not pure-bred, with many differing formats of training package qualifications existing at the diploma level. Another complexity results from the tertiary education sector's now being more strongly organised according to market principles, meaning that providers in both parts of the sector are potentially competing for the same students. All of these factors contribute to the problems arising with credit transfer and articulation and to understanding the VET–higher education interface.

The issue of reconciling the skills-based competencies of VET with the codified knowledge of higher education in order to more clearly navigate the boundaries—or the crazy paving—remains complicated. In practice it is learning equivalence that remains the point of impasse for achieving equitable credit transfer arrangements. A means for establishing equivalence is imperative to ensuring that credit is recognised and awarded without prejudice.

Walls, A. & Pardy, J. (2010).

2.7.4 The 'comparability' agenda

How similar or dissimilar are higher education standards in different institutions, and to what extent does the community expect them to be consistent? Is it sufficient to require a nationally acceptable minimum threshold standard for a given qualification, or should there be greater commonality in like areas of learning? Is it necessary to reveal qualitative differences in educational attainment?

The 'comparability' of higher education and qualifications standards has been a subject of discussion much more in the UK than in Australia and the US. Britain's initial interest between 1965 and 1992, was expressed in the efforts of the then Council for National Academic Awards (CNAA), responsible for the standards of awards offered in the polytechnics and public sector institutions, to ensure that their (CNAA) degrees were comparable in standards to those of the universities (Brown, 2010b).

Comparability was established through the use of academic staff from the existing universities in the approval and review of courses provided by the polytechnics. The CNAA's use of staff from existing university institutions established an important principle, that "ultimately the only judges of the appropriateness of standards are academic peers in the discipline concerned, and that the way in which these judgements are formed and refined is through a collective process of peer group review, where tacit values and assumptions may be as or more important than open and explicit ones" (Brown, 2010b).

...there is a call for the judgement of academic performance to be made explicit.

Now, in Australia as well as Britain, there is a call for the judgement of academic performance to be made explicit (James, 2010; House of Commons, 2009). The main argument for making explicit what have been implicit judgements is the need to reduce opaqueness, inconsistency and arbitrariness in the assessment of student work (Meyer et al. 2010). As changes to the organisation of knowledge and academic work have meant some loss of former processes of socialisation into the assessment function, the need is seen to arise for codified references for the exercise of judgement:

"The higher education system currently lacks adequate and explicit mechanisms for knowing about the standards of degrees. This has come about as the informal conversations that once guided notions of standards within disciplines have been eroded by pressures on academic work, the changing nature of disciplinary bases, and the sheer diversity and complexity of the current system. This situation has the potential to diminish domestic and international confidence in Australian higher education. The traditional standards or 'touchstones' of the academy need to be more systematically articulated and disseminated" (James, McInnis & Devlin, 2002).

However, to what extent can tacit judgements about academic quality be made explicit? By doing so is there necessarily a loss of plurality of perspective? How codifiable is tacit knowledge? If the explicit must be measurable and replicable might it fail to cover qualitatively important aspects? And while defined standards and related rules may help to improve assessment consistency, might they not limit the diversity in assessment that has been found to be associated with learning improvement (Craddock & Mathias, 2009)?

Contemporary pressures on comparability arise as a consequence of national policies to expand the system, diversify provision, increase efficiency, make the curriculum more responsive to the economy and, enlarge student choice. At the same time "resources have been under pressure, research has continued to have priority over pedagogy in many institutions, and market competition has become much more important" (Brown, 2010a). In particular, "there is substantial evidence over many years about insufficient professionalism by institutions, departments and academic staff in the practice of assessment leading, inter alia, to significant variations in the levels of achievement aimed at and realised by students—that is to say, inconsistent standards" (Brown, 2010b).

Coming from a different perspective, the Vice-Chancellor of The Australian National University has challenged the assumption of 'parity of esteem' of awards across different higher education institutions, suggested that quality assurance processes validate mediocrity rather than induce qualitative improvement, and called for benchmarks for differences in graduate attainment (See Box 9).

Box 9. A minimum acceptable standard for a degree and benchmarks for differences in graduate achievement

"In Australian higher education, we have a process of quality auditing that assesses processes but does not necessarily assure acceptable standards. It could even, by dint of the process, validate mediocrity, especially when the criteria are referenced only to national norms.

Evaluating standards is inherently difficult, and that is probably why most of the higher education quality assurance industry treats quality of process as a proxy for quality of outcomes. Standards-referenced evaluation requires a focus on how well students learn and how institutions assess this, rather than a preoccupation with how well the paperwork is prepared and the records kept.

It is time to establish a minimum acceptable standard for a degree and to develop benchmarks for differences in performance standards achieved by graduates. There are various options available, such as comparisons of student work assessed at different grades across institutions in comparable areas of study, as well as examinations of the kind used in other countries, such as the Graduate Record Examination in the United States. We have responsibilities to our graduates to safeguard the reputation of Australian qualifications in the international market."

Ian Chubb, (2008). Higher education: it's time...(to change the policy framework). ANZSOG Public Lecture. The Australian National University. Canberra.

From this perspective it is not sufficient to assure that all accredited higher education providers can attest to threshold minimum acceptable standards for the qualifications they award; it is also necessary to be able to demonstrate and validate the extent to which different providers excel beyond the threshold. In similar terms James has suggested that attention should not focus solely on the regulatory function of standards but also on their role in increasing the public transparency of institutional assessments (James, 2010). When standards are linked to assessment they fall squarely within the academic domain of responsibility, and are necessarily tied to the educational objectives of each higher education institution. That is, they are inherently more customised than common, and they are beyond the province of central regulation. The matter of comparability is discussed in more detail in Part 4. The balance between common and customised expectations and measures is considered in Part 5.

3. Developments relating to accountability for quality agenda

This part outlines the development of the accountability for quality agenda in the European Higher Education Area, Britain, the OECD, the USA and Australia. It gives particular attention to new policy and regulatory initiatives of governments, and action and reaction responses of higher education institutions and organisations.

3.1 Developments in the European Higher Education Area

Of particular interest are the following developments: the Bologna Process; Qualifications frameworks; The Diploma Supplement; Tuning; and Institutional classifications.

3.1.1 The Bologna Process

The Bologna Declaration of 19 June 1999 expressed a commitment by the 29 signature countries' ministers to a process to "bring their higher education systems into greater harmony and transparency in matters of degree cycles, quality assurance practices, and credit mechanisms so as to realise mutual recognition of course work and degrees and hence enable their students to move easily through the borderless economic landscape of Europe" (Adelman, 2009).

3.1.2 Qualifications frameworks

In 2002, the Copenhagen Declaration on enhanced European cooperation in Vocational Education and Training laid down plans for trans-European recognition of vocational qualifications. The ensuing European Qualifications Framework was seen as "a mechanism enabling comparability between national qualifications systems, thus enhancing transferability and mobility of labour" (Brockmann et al., 2008). The Berlin ministerial communiqué of 2003 expanded on the Bologna Process framework through an agreement to draw up a Qualifications Framework for the European Higher Education Area (EQF), add Doctoral education, after a Bachelor's/Master's two-cycle core, undertake to develop compatible national qualifications frameworks, develop national quality assurance systems, and expand the use-purpose of the credit transfer scheme (ECTS) to include accumulation as well as transfer, such that ECTS became the European Credit Transfer and Accumulation Scheme.

The EQF was formally adopted on 23 April 2008 when the European Parliament and the Council recommended that member states adopt it, with the following requirements:¹²

- Relate their national qualifications systems or frameworks to the EQF by 2010, by referencing, in a transparent manner, their qualifications levels to the eight levels of the EQF;
- Ensure that by 2012 all new certificates, diplomas and 'Europass' documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate EQF level;

¹² Recommendations of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning [<http://eur-lex.europa/LexUriServ.do?uri=OJ:C:2008:111:0001:0007:EN:PDF>]

- Use an approach based on learning outcomes (what the learner knows, understands and is able to do) when defining and describing qualifications;
- Promote and apply common principles of quality assurance when relating qualifications in higher education and vocational education and training within national qualifications systems to the EQF;
- Designate National Coordination Points, which will be in charge of referencing national qualifications levels to the EQF levels in a transparent way, involving all relevant stakeholders in the process.

The main role of the EQF is to provide a “translation device”, a reference for one country to explain to others how its national qualifications are arranged and how the ‘levels’ of its national qualifications system relates to the ‘levels’ of the EQF (Quintin, 2010). ‘Referencing’ means the process by which a ‘level’ in a national qualifications framework or system is related to one of the eight EQF ‘levels’. The eight EQF reference levels are described in terms of learning outcomes, independent of the place and mode of learning (see Box 10).

Whilst in respect of Higher Education, a general nomenclature is used for Bachelor’s, Master’s and Doctorate degrees, the equivalence required for reference to the EQF concerns levels rather than award titles. That is, it is the expected ‘levels’ of learning outcomes that determine where different qualifications fit in the EQF referencing, not what the qualification is called or which type of institution issued it.

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Box 10. The European Qualifications Framework

The European Qualifications Framework (EQF) acts as a translation device to make national qualifications more readable across Europe, promoting cross-country mobility of workers and learners and facilitating their lifelong learning.

The EQF aims to relate different countries’ national qualifications systems to a common European reference framework. Individuals and employers will be able to use the EQF to better understand and compare the qualifications levels of different countries and different education and training systems. Agreed upon by the European institutions in 2008, the EQF is being put in practice across Europe. It encourages countries to relate their national qualifications systems to the EQF so that all new qualifications issued from 2012 carry a reference to an appropriate EQF level. An EQF national coordination point has been designated for this purpose in each country.

The core of the EQF concerns eight reference levels describing what a learner knows, understands and is able to do—‘learning outcomes’. Levels of national qualifications will be placed at one of the central reference levels, ranging from basic (Level 1) to advanced (Level 8). This will enable a much easier comparison between national qualifications and should also mean that people do not have to repeat their learning if they move to another country.

The EQF applies to all types of education, training and qualifications, from school education to academic, professional and vocational. This approach shifts the focus from the traditional system which emphasises ‘learning inputs’, such as the length of a learning experience, or type of institution. It also encourages lifelong learning by promoting the validation of non-formal and informal learning. This reflects a wider shift within which the EQF is acting as a catalyst for reforms: most Member States are now developing their own National Qualifications Frameworks (NQFs) based on learning outcomes. Several countries (Belgium-Flanders, Britain, France, Ireland, Malta) already have one in place.

Source: European Commission. http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm. Accessed 19 July 2010.

There are several complexities in referencing exercises. One challenge is that whereas the European Qualifications Framework has 8 levels, the Irish and German national qualifications frameworks have 10, and Scotland 12. Another challenge is that level descriptors drawn up to suit national needs and circumstances reflect different orientations to learning. Some countries (e.g. Finland, Malta, Slovenia) emphasise key competencies such as learning to learn, communication and social skills, entrepreneurship and judgement (Grm & Bjornavold, 2010). The German approach treats competence as an overarching concept, covering “knowledge, ability and understanding, practical realisation and implementation, as well as generic competences” (BMBF, 2008). In this context, “competences are to be understood as general potential capabilities and personal characteristics that in (unknown) future situations (presumably) facilitate successful professional action” (BMBF, 2008). The German qualifications framework categories are divided into the field of Knowledge and Understanding (subdivided into Extending Knowledge and Consolidating Knowledge) and into the field of Skills (subdivided into Instrumental, Systemic and Communicative competences) (BMBF, 2008).

3.1.3 The Diploma Supplement

As part of the Europass System (see Box 11), the Diploma Supplement describes a higher education qualification in an easily understandable way and relates it to the higher education system within which it was issued.

Box 11. The Europass System

“The Europass system, formally established in 2004, is an internet-based system, managed at both the Community and the Nation State level with the objective of establishing a single community framework for the transparency of qualifications and competences by means of the creation of a personal, coordinated portfolio of documents outlined below.

The *Europass-CV* is a standardized CV template intended ‘to provide citizens with the opportunity to present in a clear and comprehensive way information on all their qualifications and competences’. The template is quite detailed, and individuals can choose what (not) to include. As such, it is in essence a self-declaration and thus a personal document. The electronic interface allows for linkage with the other Europass elements.

Europass-Mobility is a record documenting periods of learning attended by its holder in countries other than his/her own. It is aimed at helping the holder to better communicate what has been gained by this, again especially in terms of competences. Unlike the E-CV, this document is not compiled by an individual, but is awarded to her/him by both the sending and the hosting institution. In accordance with the importance of mobility schemes discussed earlier, the Europass-Mobility is only provided for recognized European learning pathways, i.e. those that are part of formalized mobility programs and agreements.

The *Europass-Diploma Supplement* is designed to provide information on its holder’s educational achievement at higher education level. It is attached to a higher education diploma, with similar authentication, and produced by the competent national authorities, on the basis of a common template. Although it is adaptable to local needs, the common template specifies eight categories that should be completed or it should be explained why they are not completed (a principle derived from the corporate code of good governance: ‘provide information or explain why you are not providing it’).

The *Europass-Language Portfolio*, like the E-CV is an electronic template which individuals can use to ‘present the language skills, cultural experiences and competences’. Again, like the E-CV, it is something an individual fills out, with the help of guidelines provided, but as such it is a non-certified document. It is intended to serve two purposes: pedagogical and reporting. As to pedagogical, it is supposed to ‘enhance motivation for language learning and intercultural experiences’, whilst as to reporting it ‘documents language proficiency and takes stock of competency levels’. It should be noted that experiences imply both formal and informal experiences.

The *Europass-Certificate Supplement* is the vocational training equivalent to the DS. It describes the competences and qualifications that correspond to a vocational training certificate, and is an officially certified document, awarded by the competent national authorities.”

Goedegebuure & Corrigan (2008).

3.1.4 Institutional classifications

The Europeans have also indicated some sensitivity to international league tables of higher education institutions which rely primarily on measures of research performance, and where European institutions, with a few notable exceptions, tend to be ranked outside the top 100. They are interested in a broader view of the role of universities and a more balanced representation of the importance of teaching and learning in ratings and classifications (van Vught et al., 2010).

U-Map has been developed as an instrument to classify universities and to map the European university landscape. It is an instrument that allows the various stakeholders as active users of the classification to decide for themselves which elements of the multidimensional classification are important to them (www.u-map.eu).

Institutions are described along six dimensions: Teaching and learning profile; Student profile; Research involvement; Involvement in knowledge exchange; International orientation; and Regional engagement. A multidimensional classification system is intended to provide a series of lenses through which important similarities and differences among higher education institutions can be described and compared. U-Map does this by providing a framework for creating and analysing 'institutional profiles' (see Box 12).

ProfileFinder produces a list of higher education institutions (HEIs) that are comparable on the characteristics selected by the inquirer. *ProfileViewer* provides an institutional activity profile for comparing three institutions (www.u-map.eu).

U-Map aims to make transparent the diversity of European Higher Education. It is a descriptive tool to identify higher education institutions that show similarities on certain indicators and dimensions, and enable meaningful comparisons (van Vught, 2010). The U-Map approach contrasts with "current quality assurance schemes that tend to emphasise uniformity...and present information in the form of 'passing uniform thresholds' (accreditation), succeeding in generally acceptable performances (audits), or ratings on uniform scales (rankings)" (van Vught et al., 2010).

The U-Map approach prioritises transparency for multiple stakeholders, valuing diversity of purpose on the part of learners and provider institutions, without diminishing institutional accountability to government for the cost-effective use of resources.

The U-Map approach contrasts with "current quality assurance schemes that tend to emphasise uniformity... and present information in the form of 'passing uniform thresholds' (accreditation), succeeding in generally acceptable performances (audits), or ratings on uniform scales (rankings)".

Box 12. U-Map Institutional Profiles

Teaching and learning profile	Student profile	Research involvement
<ul style="list-style-type: none"> • Degree level focus • Range of subjects • Orientation of degree • Expenditure on teaching 	<ul style="list-style-type: none"> • Mature students • Part-time students • Distance learning students • Size of student body 	<ul style="list-style-type: none"> • Peer reviewed publications • Doctorate graduation • Expenditure on research
Involvement in knowledge exchange	International orientation	Regional engagement
<ul style="list-style-type: none"> • Start-up firms • Patent application filed • Cultural activities • Income from knowledge exchange activities 	<ul style="list-style-type: none"> • Foreign degree seeking students • Incoming students in international exchange programmes • Students sent out in international exchange programmes • International academic staff • The importance of international sources of income in the overall budget of the institution 	<ul style="list-style-type: none"> • Graduates working in the region • First year bachelor students from the region • Importance of local/regional income sources
van Vught et al., 2010.		

U-Multirank

In another effort to dilute the research bias of world university rankings, work is underway in designing a user-driven, interactive web-based ranking system. The approach involves three user steps: (i) selecting institutions or fields within institutions, drawing on U-Map for the identification of comparable institutions; (2) choosing whether to rank at whole of institution or field level; and (iii) selecting a set of indicators to suit their needs, either from a choice of menus or from a personalised selection from the data cells on the information grid. The main advantage of the U-Multirank approach is that it offers multi-dimensional views of the capacities and performance of institutions, reflecting the diversity of the systems and the varying needs of users:

“The implication of this approach is that institutions can be expected to have different comparative results on different dimensions. The set of the ‘scores’ of an individual institution on the whole set of dimensions of the classification defines the institution’s ‘performance profile’ (CHERPA-Network, 2010).

The main advantage of the U-Multirank approach is that it offers multi-dimensional views of the capacities and performance of institutions, reflecting the diversity of the systems and the varying needs of users...

3.1.5 Tuning

Tuning Educational Structures in Europe started in 2000 as a project to link development in Higher Education to the political objectives of the Bologna Process. Over time, tuning has developed into a ‘process’, an approach to re-designing, developing, implementing, evaluating and enhancing the quality of first, second and third cycle degree programs (Tuning, 2010). The Tuning outcomes and its tools are presented in a range of Tuning publications, which institutions and their academics are invited to test and use in their own context. Tuning focuses not on educational systems but on educational structures with an emphasis on the content of studies. Whereas educational systems are primarily the responsibility of governments, educational structures and content are those of higher education institutions and their academic staff (Tuning, 2010).

The following outline of Tuning has been extracted from the official Tuning website (Tuning, 2010):

"In the framework of the Tuning project a methodology has been designed to understand curricula and to make them comparable. Five lines of approach have been distinguished to organize the discussions in the subject areas:

1. generic (general academic) competences,
2. subject-specific competences,
3. the role of ECTS as an accumulation system
4. approaches to learning, teaching, and assessment and
5. the role of quality enhancement in the educational process (emphasising systems based on internal institutional quality culture).

Each line has been developed according to a pre-defined process. The starting point was updated information about the state of the art at European level. This information was then reflected upon and discussed by teams of experts in the now nine subject related areas. It is the work of these teams, validated by the respective European networks, that has provided understanding, context and conclusions which can be considered valid at European level (Tuning, 2010)

Tuning has developed a model for designing, implementing and delivering curricula offered within one institution, or, jointly, by two or more institutions. The following main steps in the process for designing a study programme either a local programme or an (international) integrated programme/joint degree were identified:

1. Meeting the basic conditions:

For all study programmes:

- Has the social need for the programme on a regional/national/European level been identified? Has this been done on the basis of a consultation of stakeholders: employers, professionals and professional bodies?
- Is the programme of sufficient interest from the academic point of view? Have common reference points been identified?
- Are the necessary resources for the programme available inside or, if required, outside the (partner) institution(s) concerned?

For international degree programmes offered by more than one institution:

- Is there commitment of the institutions concerned? On what basis: an (official) agreement or a strategic alliance?
- Is there sufficient guarantee that the programme will be recognised legally in the different countries?
- Is there agreement with regard to the length of the programme to be designed in terms of ECTS-credits based on student workload?

2. Definition of a degree profile.
3. Description of the objectives of the programme as well as the learning outcomes (in terms of knowledge, understanding, skills and abilities) that have to be met.
4. Identification of the generic and subject-related competences which should be obtained in the programme.
5. Translation into the curriculum: content (topics to be covered) and structure (modules and credits).

6. Translation into educational units and activities to achieve the defined learning outcomes.
7. Deciding the approaches to teaching and learning (types of methods, techniques and formats), as well as the methods of assessment (when required, the development of teaching material).
8. Development of an evaluation system intended to enhance its quality constantly.

This model is based on the assumption that programmes can and should be enhanced on the basis not only of feedback but also of 'feed forward' by taking into account developments in society as well as the academic field concerned.

Tuning makes the distinction between learning outcomes and competences to distinguish the different roles of the most relevant players: academic staff and students/learners. Desired learning outcomes of a process of learning are formulated by the academic staff, preferably involving student representatives in the process, on the basis of input of internal and external stakeholders. Competences are obtained or developed during the process of learning by the student/learner. In other words:

- Learning outcomes are statements of what a learner is expected to know, understand and/or be able to demonstrate after completion of learning. They can refer to a single course unit or module or else to a period of studies, for example, a first or a second cycle programme. Learning outcomes specify the requirements for award of credit.
- Competences represent a dynamic combination of knowledge, understanding, skills and abilities. Fostering competences is the object of educational programmes. Competences will be formed in various course units and assessed at different stages.

Tuning distinguishes three types of generic competences:

- Instrumental competences: cognitive abilities, methodological abilities, technological abilities and linguistic abilities;
- Interpersonal competences: individual abilities like social skills (social interaction and co-operation);
- Systemic competences: abilities and skills concerning whole systems (combination of understanding, sensibility and knowledge; prior acquisition of instrumental and interpersonal competences required).

Tuning links learning outcomes, competences and ECTS workload-based credits (Tuning, 2010).

Importantly, tuning reports make it clear that subject area learning outcome statements are reference points only, and are not intended to prescribe the 'profile' of individual programs which may include learning outcomes additional to the Tuning documentation (Harris, 2009).

...tuning reports make it clear that subject area learning outcome statements are reference points only...

3.2 Developments in Britain

Here we look at the 'academic infrastructure', its components and their evolution, and emerging developments following the May 2010 election of a coalition Conservative-Liberal-Democrat Government.

3.2.1 The 'Academic Infrastructure'

The UK's 'Academic Infrastructure' (refer to Box 2 in part 1) derives from the recommendations of the 1997 (Dearing) Report of the National Committee of Inquiry into UK Higher Education. It comprises a national qualifications framework, subject benchmark statements, program specifications, and a code of practice. Universities and other higher education institutions also make use of external examining arrangements relating to the Academic infrastructure and their own academic orientations.

The Code of practice for the assurance of academic quality and standards in higher education

The *Code of practice* sets out guidelines on good practice relating to the management of academic standards and quality. Each section of the *Code of practice* has precepts or principles that institutions should satisfy, with guidance on how they might meet these precepts. The *Code* has 10 sections:

- postgraduate research programmes;
- collaborative provision;
- students with disabilities;
- external examining;
- academic appeals and student complaints on academic matters;
- assessment of students;
- programme approval, monitoring and review;
- career education, information and guidance;
- placement learning;
- recruitment and admissions.

A serious challenge to the transparency and reliability of the operation of the Academic infrastructure was raised by the House of Commons Select Committee on Innovation, Universities, Science and Skills in 2009 (see Box 13). The select committee called for a more rigorous and nationally consistent approach to academic standards.

Box 13. Recommendations of the House of Commons IUSSC, 2009

"While we celebrate and encourage the diversity of the higher education sector in England, it is our view that there need to be some common reference points. We consider that standards have to be capable of comprehensive and consistent application across the sector.

The Quality Assurance Agency for Higher Education (QAA) should be responsible for maintaining consistent, national standards in higher education institutions in England and for monitoring and reporting on standards.

We conclude that the reformed QAA's new remit should include the review of, and reporting, on the quality of teaching in universities and, where shortcomings are identified, ensuring that they are reported publicly and addressed by the institution concerned.

We recommend that all higher education institutions in England have their accreditation to award degrees reviewed no less often than every 10 years by the reformed QAA. Where the Agency concludes that all or some of an institution's powers should be withdrawn, we recommend that the Government draw up and put in place arrangements which would allow accreditation to award degrees to be withdrawn or curtailed by the Agency.

We recommend that the reformed QAA have powers to carry out reviews of the quality of, and standards applied in, the assessment arrangements for an institution's courses, including, if necessary, its degree awarding powers, in response to external examiners' or public concerns about the standards in an institution or at the direction of the Secretary of State."

House of Commons Innovation, Universities, Science and Skills Committee (2009).

The Select Committee drew attention to the limited role of the Quality Assurance Agency for Higher Education (QAA), noting that the QAA's purpose, in its own words, is "to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education." The QAA pointed out in its written evidence to the Committee that:

"The primary responsibility for academic standards and quality rests with individual institutions. QAA reviews and reports on how well they meet those responsibilities, identifies good practice and makes recommendations for improvement. We visit institutions to conduct our audits, make judgements and publish reports, but we are not an inspectorate or a regulator and do not have statutory powers. We aim to ensure that institutions have effective processes in place to secure their academic standards, but we do not judge the standards themselves."

However, noting ambiguity about the variability of degree attainment and the interests of students in knowing the relative value of their qualifications in a more contested market, the select committee proposed that the QAA should be reformed and re-established as a Quality and Standards Agency with the responsibility for monitoring and reporting on standards, and "consistent" standards across all higher education institutions:

"We consider that so long as there is a classification system it is essential that it should categorise all degrees against a consistent set of standards across all higher education institutions in England. Such work will need to build upon work previously undertaken by the QAA and other bodies with responsibilities for accreditation of degrees such as those in engineering."

Additionally the select committee suggested that in its view "consistency" of standards ought to apply not only at the threshold level but for "the comparison of excellence":

"the argument was put forward that minimum standards, not comparability, was the issue. We fail to see why minimum standards should be a substitute for the comparison of excellence. Both are important... We have concluded that the QAA should be responsible for maintaining consistent national standards."

In this context, there is a noticeable shift in the policy position of the QAA, from its 2006 acceptance of differences in graduate attainment to its 2009 insistence of the need for "broad comparability":

"It cannot be assumed that students graduating with the same classified degree from different institutions having studied different subjects, will have achieved similar academic standards... that students graduating with the same classified degree from a particular institution having studied different subjects, will have achieved similar academic standards... or that] students graduating with the same classified degree from different institutions having studied the same subject, will have achieved similar academic standards."
(Quality Assurance Agency for Higher Education, 2006b)

"We fail to see why minimum standards should be a substitute for the comparison of excellence. Both are important... We have concluded that the QAA should be responsible for maintaining consistent national standards."

"While the freedom of institutions to design and run their own courses is important, it is equally important that degrees from different institutions across the UK are broadly comparable." (Quality Assurance Agency for Higher Education, 2009)

Nevertheless, there remains some confusion in the policy approach and in the use of terminology, as discussed at 4.3.5 below. Now the QAA is asking the UK higher education sector to give its views on the Academic Infrastructure as part of a major evaluation it is launching in 2010. The purpose of the evaluation is to establish whether the Academic Infrastructure is meeting its aims, whether it remains 'fit for purpose' and whether it is flexible enough to accommodate future developments in higher education (QAA, 2010). The external examining arrangements are included in this evaluation.

3.2.2 Framework for higher education qualifications in England, Wales and Northern Ireland (FHEQ)

A national framework for higher education qualifications was proposed originally in the 1997 Dearing Report. The qualifications framework for England, Wales and Northern Ireland (FHEQ) was first published in 2001. It was developed and is maintained by the QAA. The main purposes of the FHEQ are outlined in Box 14.

Box 14. The purposes of the FHEQ

- Provide important points of reference for setting and assessing academic standards to higher education providers and their external examiners
- Assist in the identification of potential progression routes, particularly in the context of lifelong learning
- Promote a shared and common understanding of the expectations associated with typical qualifications by facilitating a consistent use of qualifications titles across the higher education sector.

QAA, (2008).

The FHEQ is not regarded as a regulatory tool but rather as a descriptive reference for higher education institutions, students and others:

"The FHEQ is an important reference point for providers of higher education. The FHEQ and associated guidance for implementation, has been written to assist higher education providers to maintain academic standards; to inform international comparability of academic standards, especially in the European context; to ensure international competitiveness; and to facilitate student and graduate mobility" (QAA, 2008).

The FHEQ is also used as a reference point in institutional audits and external reviews. QAA audit and review teams "examine the means which higher education providers use to ensure that their awards and qualifications are of an academic standard at least consistent with those referred to in the FHEQ" (QAA, 2008). However, the QAA makes it clear that in external audit and review of the ways by which higher education providers check the alignment between the academic standards of their awards and the FHEQ levels, "the FHEQ should be regarded as a framework, not as a straitjacket" (QAA, 2008).

...the FHEQ does not adopt a common competency-based and decontextualised view of learning but rather understands higher education qualifications to represent integrated higher order learning.

The qualification descriptors in the FHEQ set out the generic outcomes and attributes expected for the award of individual qualifications. Unlike national qualifications frameworks in Australia, Scotland and elsewhere,¹³ the FHEQ does not adopt a common competency-based and de-contextualised view of learning but rather understands higher education qualifications to represent integrated higher order learning:

"The qualification descriptors contained in the FHEQ exemplify the outcomes and attributes expected of learning that results in the award of higher education qualifications. These outcomes represent the integration of various learning experiences resulting from designated and coherent programmes of study. These qualifications, which develop graduates with high-level analytical skills and a broad range of competences, are therefore distinct from training or solely the acquisition of higher level skills" (QAA, 2008).

In the effort to achieve consistency in the use of qualifications titles, while recognising differences in learning volumes and intended outcomes, the FHEQ allows for some mix of levels for a given title. For example, a professional doctorate program, while classified to FHEQ Level 8, may involve up to one third of study at Level 7. Similarly, an Integrated Master's degree typically involves 25% of study at Level 7 and 75% of study at Level 6. This approach is rather confused in two respects. First, the purpose of levels is to describe the learning outcomes expected of a graduate's exit level of capability, not the mix of learning challenges along the way. Second, it becomes difficult to identify the equivalence of a qualification whose learning outcomes are expressed across more than one level. This matter is important in determining suitability for employment and further learning, and for recognition of prior learning and credit transfer. A sounder approach would be to allow for multiple qualification types and titles within a defined level of expected learning outcomes.

The English solution to the problem in this regard, though it is only a partial one, involves the use of complementary references to identify the learning outcomes expected for a particular qualification awarded by a particular university in a particular field of learning. Programme specifications and subject benchmark statements are the main complementary references:

"Programme specifications are one of a number of ways in which higher education providers are able to describe the intended learning outcomes. Subject benchmark statements represent general expectations about the standards of achievement and general attributes to be expected of a graduate in a given subject area. The qualifications frameworks provide information about the level and character of programmes leading to particular named awards. Programme specifications will reflect these general points of reference, but as they state the outcomes that should result from successful completion of an individual programme, they are a source of more specific information, particularly for prospective and current students" (QAA, 2006).

3.2.3 Programme Specifications

The 1997 Dearing Report stressed "the importance of clear and explicit information for students so that they can make informed choices about their studies and the levels they are aiming to achieve". It recommended that "clear descriptions of programmes should be developed so that students are able to compare different offerings and make sensible choices about the programmes they wish to take" (Dearing, 1997). In 2000, the QAA issued its inaugural guidelines for programme specifications to be developed by each higher education provider for all of its award programs. The guidelines were revised in 2006 (see Box 15).

¹³ The New Zealand framework for describing levels of learning outcomes for Master and Doctorate degrees differs from the framework for describing vocational competencies.

Box 15. UK Programme Specifications

"Programme specifications are the sets of information that each institution provides about its programmes. Each specification clarifies what knowledge, understanding, skills and other attributes a student will have developed on successfully completing a specific programme. It also provides details of teaching and learning methods, assessment and subsequent career opportunities, and sets out how the programme relates to the qualifications framework. This information allows prospective students to make comparisons and informed choices about the programmes they wish to study and provides useful guidance for recruiters of graduates."

"In general, modules or other units of study have stated outcomes, often set out in handbooks provided by institutions to inform student choice. These intended learning outcomes relate directly to the curriculum, study and assessment methods and criteria used to assess performance. Programme specifications can show how modules can be combined into whole qualifications. However, a programme specification is not simply an aggregation of module outcomes; it relates to the learning and attributes developed by the programme as a whole and which, in general, are typically in higher education more than the sum of the parts."

QAA, 2006, and 2010.

Some programme specifications focus on the student audience and aim to help them to understand the teaching and learning methods that enable their intended learning outcomes to be achieved; the assessment methods that enable achievement to be demonstrated; and the relationship of the programme and its study elements to the qualifications framework and to any subsequent professional qualification or career path.

In other cases, programme specifications are used primarily as quality assurance documents, particularly in design, approval and review processes. For the purposes of audit and review, programme specifications are '...the definitive publicly available information on the aims, intended learning outcomes and expected learner achievements of programmes of study, and audit teams will wish to explore their usefulness to students and staff, and the accuracy of the information contained in them' (*Handbook for institutional audit: England and Northern Ireland, 2006*). Bearing in mind the part that programme specifications play in audit and review processes, the QAA advises that "it is important that they are fit for the purpose that they fulfil in each individual institution" (QAA, 2006).

The QAA does not prescribe any particular approach to or style of programme specification, but suggests that the following information will normally be included in a programme specification:

- awarding body/institution
- teaching institution (if different)
- details of accreditation by a professional/statutory body
- name of the final award
- programme title
- UCAS code
- criteria for admission to the programme

"Each specification clarifies what knowledge, understanding, skills and other attributes a student will have developed on successfully completing a specific programme. It also provides details of teaching and learning methods, assessment and subsequent career opportunities, and sets out how the programme relates to the qualifications framework."

- aims of the programme
- relevant subject benchmark statements and other external and internal reference points used to inform programme outcomes
- programme outcomes: knowledge and understanding; skills and other attributes
- teaching, learning and assessment strategies to enable outcomes to be achieved and demonstrated
- programme structures and requirements, levels, modules, credits and awards
- mode of study
- language of study
- date at which the programme specification was written or revised.

In addition, institutions may include information on:

- what makes the programme distinctive
- assessment regulations
- student support
- methods for evaluating and improving the quality and standards of learning, including consideration of stakeholder feedback from, for example, current students, graduates and employers.

Source: QAA (2006) *Guidelines for preparing programme specifications* (QAA 115 06/06).

3.2.4 Subject benchmark statements

Subject benchmark statements set out expectations about standards of degrees in a range of subject areas. They describe the conceptual framework that gives a discipline its coherence and identity, and define what can be expected of a graduate in terms of the techniques and skills needed to develop understanding in the subject. They also identify the level of intellectual demand and challenge represented by an honours degree in subject areas, and help higher education institutions when they design and approve programmes. Subject benchmark statements describe what can be expected of a graduate in terms of broad subject coverage and the techniques and skills gained at first degree (and sometimes Master's) level in a subject. They are developed by discipline communities and then reviewed by subject specialists and overseen by the QAA (QAA, 2004).

Subject benchmark statements set out expectations about standards of degrees in a range of subject areas.

QAA describes benchmark statements as follows:

"Subject benchmark statements provide a means for the academic community to describe the nature and characteristics of programmes in a specific subject. They also represent general expectations about the standards for the award of qualifications at a given level and articulate the attributes and capabilities that those possessing such qualifications should be able to demonstrate" (QAA, 2004).

The QAA represents subject benchmark statements not as prescriptive templates but as external references:

"Subject benchmarks statements are an important external source of reference for higher education institutions when new programmes are being designed and developed in a subject area. They are not

seen as prescriptive. They provide general guidance for articulating the learning outcomes associated with the programme but are not a specification of a detailed curriculum in the subject” (QAA, 2004).

The QAA also notes that Subject Benchmark Statements are but one of several references for the exercise of judgement in academic review:

“Subject benchmark statements are one of a number of external sources of information that are drawn upon for the purposes of academic review and for making judgements about threshold standards being met. Reviewers do not use subject benchmark statements as a crude checklist for these purposes however. Rather, they are used in conjunction with the relevant programme specifications, the institution’s own internal evaluation documentation, together with primary data in order to enable reviewers to come to a rounded judgement based on a broad range of evidence” (QAA, 2004).

Subject areas do not map neatly to institutional structures (e.g. departments or schools), nor to degree titles (Harris, 2009). While there are variations in the approaches of different subject groups, the broad framework for describing subject benchmarks is shown at Box 16.

Box 16. Subject Benchmark Statements

Section	Description
Defining principles	The subject area is defined and any important dimensions such as routes into professional practice are described.
Nature and extent of the subject	This is an opportunity to describe the nature of the subject in more detail, including the boundaries of the discipline and its relationship with cognate areas.
Knowledge, understanding and skills	The core areas of knowledge expected to be covered in an honours degree in the subject are described alongside the skills that the degree should foster in its graduates (both subject-specific and generic).
Teaching, learning and assessment	A description of methods of teaching, learning and assessment that are considered to be particularly relevant to an undergraduate education in the subject area, for example the undertaking of work-based learning or practical delivery through fieldwork or laboratory sessions.
Benchmark standards	The threshold standard, which is the minimum performance expected of an honours degree graduate defined by what he or she is expected to be able to know, do or understand at the end of the programme of study—the statement may also articulate typical and excellent standards of attainment.
Bellingham, 2008.	

Subject Benchmark Statements vary in their level of detail, but share a common approach in providing descriptions of the learning outcomes expected for graduates in terms of both *coverage* and *level*. That is: the knowledge or skills to be acquired, or ‘attributes’ to be developed; and how well a graduate can be expected to demonstrate them. Coverage involves subject-specific knowledge and subject-specific skills, and generic or transferable skills. Subject Benchmark Statements depict the expected level of learning through descriptions of both *threshold standards* and *typical standards* (see Box 17).

Box 17. Subject Benchmark Statements: Standards for Biosciences: 'Generic' and 'Subject-specific', 'Threshold' and 'Typical'

Generic standard	Subject-specific standard (subject area: Organisms)
<p><u>Threshold standard</u></p> <p>On graduating with an honours degree in biosciences, students should:</p> <ul style="list-style-type: none"> • be able to access bioscience information from a variety of sources and to communicate the principles in a manner appropriate to the programme of study <p><u>Typical standard</u></p> <p>On graduating with an honours degree in biosciences, students should:</p> <ul style="list-style-type: none"> • be able to access and evaluate bioscience information from a variety of sources and to communicate the principles both orally and in writing (e.g. essays, laboratory reports) in a way that is well organised, topical and recognises the limits of current hypotheses 	<p><u>Threshold standard</u></p> <p>On graduating with an honours degree in biosciences in which the study of organisms forms a significant proportion, students should be able to:</p> <ul style="list-style-type: none"> • show knowledge of the basic genetic principles relating to, and evolution of, the organisms studied <p><u>Typical standard</u></p> <p>On graduating with an honours degree in biosciences in which the study of organisms forms a significant proportion, students should be able to:</p> <ul style="list-style-type: none"> • describe and analyse patterns of inheritance and complex genetic interactions relating to the lives and evolution of the organisms studied
Harris, 2009.	

Box 18 provides a comparison of the Subject Benchmark Statements and Tuning.

Box 18. Tuning & Subject Benchmarking compared

Tuning	Benchmarking
<p>Definitions;</p> <p>"The Tuning Process—identifying <i>threshold-level learning outcomes</i> for a wide range of subject areas".</p> <p>"Tuning focuses not on educational systems, but on educational structures with emphasis on the subject area level, that is the content of studies. Whereas educational systems are primarily the responsibility of governments, educational structures and content are that of higher education institutions and their academic staff".</p> <p>"Tuning, in the context of quality in higher education, refers to the process in Europe of adjusting degree provision so that there are points of similarity across the European Higher Education Area."</p> <p>implementation of the Bologna Declaration process on a university level.</p>	<p>Definition;</p> <p>Subject Benchmark Statements "subject specific statements of learning outcomes form part of the national quality assurance framework."</p> <p>"Benchmark statement, in higher education, provides a reference point against which outcomes can be measured and refers to a particular specification of programme characteristics and indicative standards."</p> <p>"(Subject) benchmark statement: Represents general expectations about standards (levels of student attainment) at a given level in a particular subject area. They are reference points in a quality assurance framework rather than prescriptive statements about curricula."</p>
<p>How it works;</p> <p>"Tuning has generated external reference points for Bachelor and Master programs which are described in terms of learning outcomes and competences."</p> <p>"a measurement of the effectiveness of the Tuning process is in the extent to which programs of study are described in terms of learning outcomes and competences."</p> <p>"Tuning: The term "tuning" emphasizes the notion that universities are not looking to unify or harmonize their degree programs into a prescribed set of European curricula, but rather are looking for points of convergence and common understanding based on diversity and autonomy."</p>	<p>How it works;</p> <p>"Primary focus is at the level of Bachelor degree with honours, with some extension into Masters".</p> <p>"Subject benchmark statements provide a means for the academic community to describe the nature and characteristics of programmes in a specific subject. They also represent general expectations about the standards for the award of qualifications at a given level and articulate the attributes and capabilities that those possessing such qualifications should be able to demonstrate."</p> <p>Primarily, they are an important external source of reference for higher education institutions when new programmes are being designed and developed in a subject area. They provide general guidance for articulating the learning outcomes associated with the programme but are not a specification of a detailed curriculum in the subject. Benchmark statements provide for variety and flexibility in the design of programmes and encourage innovation within an agreed overall framework.</p> <p>The statements are published by QAA, and form part of the quality assurance framework described by the Agency as the 'academic infrastructure' of the UK".</p>

How it came about (Evolution of the process);	How it came about (Evolution of the process);
<p>"The original Tuning projects in Europe involved 27 countries and 9 subject areas".</p> <p>Summer 2000 a group of universities developed a pilot project. The main aim and objective of the project is to contribute significantly to the elaboration of a framework of comparable and compatible qualifications in each of the (potential) signatory countries of the Bologna process, which should be described in terms of workload, level, learning outcomes, competences and profile.</p>	<p>Benchmarking in UK began in the early to mid 1990's.</p> <p>"In some subject areas, national statements of expected learning have been in place for a decade. Developed originally by disciplinary communities, these 'subject benchmark statements' are reviewed and updated in a process undertaken by "subject specialists drawn from and acting on behalf of the subject community" and overseen by QAA".</p>
Common elements;	Common elements;
<p>Basically both looking at what students need to learn.</p> <p>"The 'Tuning' initiative is sponsored by the European Commission. Like UK benchmarking, it seeks to identify generic and subject-specific competences for 1st cycle degrees. Phase 1 covered 9 discipline areas; Phase 2 a further 15. These reference points, which address workload as well as learning outcomes, are intended to provide support for one of the action lines of the Bologna Process."</p> <p>Reference points are described in terms of learning outcomes and competencies and these "broadly equate to the threshold standards described under the Subject Benchmark Statements of the UK".</p> <p>"Tuning describes thresholds of achievement for particular award level (approach is usually to focus on what distinguishes each level of award, over and above the lower award. i.e. what a Masters graduate is expected to achieve beyond the achievements of a Bachelor graduate)."</p>	<p>"UK subject benchmark statements describe subject-specific knowledge and skills and generic skills at both 'threshold' and 'typical' levels of learning outcomes.</p>
Differences;	Differences;
<p>Discipline communities own the process.</p> <p>It is a "project by and for universities".</p>	<p>Developed by discipline communities but then reviewed by subject specialists and overseen by QAA.</p>
How has it been received by the sector?	How has it been received by the sector?
<p>It is now in its 3rd phase which focuses on "implantation through the support of various international associations and networks".</p>	<p>"Not the idea of the academic community...but engagement in development has led to a sense of ownership and 'internalising' of national statements within individual university contexts".</p>

3.2.5 External examiners

Institutions' use of the academic infrastructure is evaluated through periodic institutional reviews covering all aspects of quality management. These reviews, conducted by academic peers, may lead to judgements of "confidence", "limited confidence" or "no confidence" in all or a part of an institution's provision. Another dimension of the external validation process is the use of external examiners. External examiners are used to assure academic standards across higher education awards (see Box 19).

Box 19. External Examiners in the UK

In the UK's system of higher education, institutions are responsible for the quality of the education they provide and the academic standards of the awards they offer. External examining is a long-standing system that is almost unique to UK Higher Education and is just one of the many ways in which institutions monitor whether the academic standards are appropriate. All UK universities make use of this network of independent and impartial academic advisers, drawn from other institutions or from areas of professional practice.

Examiners are typically asked to report on:

- whether the academic standards set for its awards, or part thereof, are appropriate
- the extent to which assessment processes are rigorous, ensure equity of treatment for students and have been fairly conducted within institutional regulations and guidance
- the standards of student performance in the programmes or parts of programmes which they have been appointed to examine
- where appropriate, the comparability of the standards and student achievements with those in some other higher education institutions
- good practice they have identified

External examiners report to the Vice-Chancellor of the university, by referring both to their experience of standards in other universities, and to the Academic Infrastructure established by the Quality Assurance Agency for Higher Education (QAA). External examiner reports have significant status within the university. They are considered at, and used by, the department and university in internal quality assurance committees. External institutional review, conducted by the QAA, tests the effectiveness of the institution's processes for supporting and acting upon the recommendations of external examiners.

Universities UK, 2010.

The Quality Assurance Agency's Code of Practice sets out the arrangements and their relation to institutional audit and review. The QAA Code of Practice describes the role of external examiners in terms of reporting on both the expected and applied standards:

"An institution should ask its external examiners, in their expert judgement, to report on:

- i. whether the academic standards set for its awards, or part thereof, are appropriate;
- ii. the extent to which its assessment processes are rigorous, ensure equity of treatment for students and have been fairly conducted within institutional regulations and guidance;
- iii. the standards of student performance in the programmes or parts of programmes which they have been appointed to examine;

...reviews, conducted by academic peers, may lead to judgements of "confidence", "limited confidence" or "no confidence" in all or a part of an institution's provision.

- iv. where appropriate, the comparability of the standards and student achievements with those in some other higher education institutions;
- v. good practice they have identified."

QAA (2004). *Code of Practice for the Assurance of Academic Quality and Standards in Higher Education*. Section 4: External examining.

Partly in response to the concerns raised by the House of Commons select committee, UniversitiesUK, GuildHE and the QAA, in July 2010, released a discussion paper, "Review of External Examining Arrangements in the UK" (UniversitiesUK, 2010). The discussion paper has proposed principles to inform the strengthening of external examining; a structure of minimum expectations of the role of external examiners; national criteria for appointment of external examiners and greater transparency of appointment processes; the provision of induction and training; a national template for examiner reporting; and processes for examiners to raise concerns they might have with institutional responses.

The discussion paper notes many positive aspects of the external examining arrangements:

- The professional dedication and expertise of external examiners as part of a peer review approach
- The sharing of good practice and advice that is inherent in a peer review approach
- The respect and seriousness with which institutions consider the comments of external examiners
- The rigour with which institutions operate their external examining arrangements
- The embedding in institutional processes of key elements of the QAA Code of Practice for the assurance of academic quality and standards in higher education, specifically Section 4 on External Examining (UniversitiesUK, 2010).

The discussion paper notes that, despite those strengths, "concerns have been raised about consistency, transparency and complexity" (UniversitiesUK, 2010). In particular, there is acknowledged variability in the roles and rigour of external examiners across fields of study and institutions, and appointment arrangements may be too cosy in some cases (UniversitiesUK, 2010). Additionally, there are new challenges associated with changes in the structure of study offerings and assessment frameworks. In particular, Bachelor degree programs in the UK have adopted a 'modular' structure, with varying choices by students over the composition and timing of electives, and a related decline in the use of 'capstone' assessment. It has been argued that the capacity for the external examination system to moderate assessment in an increasingly modularised system has been exceeded (Harris, 2009).

Various options discussed for the future of the external examination system, including:

- increasing the assessment expertise of examiners, possibly through a combination of increased support, recognition and reward;
- moving to a model where institutions explicitly partner with 'like' institutions and programs, accepting that the notion of standards is no longer 'national' in such a system;
- introduction of a "college of peers" approach, emphasising examiners' affiliations with subject areas rather than institutions; and
- shifting the focus of examiners to inputs, including the design of curricula and assessment, and the process of measuring attainment, and away from direct examination of student work (Harris, 2009).

3.2.6 Recent developments

The new Conservative-Liberal Democrats coalition government has moved early to require higher education institutions to publish ‘employability statements’—“a short summary of what universities and colleges offer to their students to support their employability and their transition into employment and beyond” (HEFCE, 2010). The statements are to cover four mandated areas: careers, work experience, curriculum support and accreditation. The new Government’s initiative is seen to be responding to employer and student concerns: “Graduate employability was highlighted as a key priority for business by the Confederation of British Industry, and for students by the National Student Forum which, in its recent report, emphasised the importance of opportunities for students to enhance their work-related skills” (HEFCE, 2010).

In November 2009, the previous Brown Labor Government established an Independent Review of Higher Education Funding and Student Finance, chaired by Lord Browne, tasked with making recommendations to Government on the future of fees policy and financial support for full and part-time undergraduate and postgraduate students. Referring to the Browne review in June 2010, the Minister of State for Universities and Science, David Willetts, asked why future students should be asked to pay more “when the current crop of students is telling us that they’re often not receiving enough direct academic feedback, and that they’re not receiving sufficient preparation to enter the job market?” (Willetts, 2010). He also noted the diversity of the contemporary British higher education student body, noting its implications for diversity of higher education provision:

“Widening participation, of course, goes hand in hand with diversity—not making every university conform to a standard model but allowing them to develop their own approaches to the various needs and ambitions of students” (Willetts, 2010).

Willetts referred to an exchange between the Vice-Chancellor of Oxford Brookes University during the hearings of the House of Commons Select Committee on Innovation, Universities, Science and Skills:

“This diversity also means that degrees do not fit into some standard model, as Janet Beer made clear in what was perhaps the most significant exchange during last year’s select committee hearings. It was a classic moment. Graham Stringer asked her: “Is a 2:1 from Oxford Brookes the equivalent of a 2:1 from Oxford University—say in the same subject, history—and how would you know?” Janet replied: “In the general run of things there is very little equivalence between Brookes and Oxford, there is not that much overlap”. And later, “It depends what you mean by equivalent. I am sorry to quibble around the word but ‘is it worth the same’ is a question that is weighted with too many social complexities. In terms of the way in which quality and standards are managed in the university I have every confidence that a 2:1 in history from Oxford Brookes is of a nationally recognised standard.” That answer is my text for today, for it gets to the heart of the dilemma: standardisation versus diversity” (Willetts, 2010).

“Widening participation, of course, goes hand in hand with diversity—not making every university conform to a standard model but allowing them to develop their own approaches to the various needs and ambitions of students.”

Willetts then went on to “float an idea that I think could transform the incentives to focus on high-quality teaching”, and suggested the separation of teaching and examining, “creating new institutions that can teach, but do so to an exam set externally”. He noted that all English and Welsh universities founded between 1849 and 1949 offered University of London external degrees, and that today the Open University provides similar ‘validation services’, and employers find them valuable:

"It has generally been assumed that any home-grown institution offering higher education must award its own degrees. But I am interested in looking at whether some institutions could benefit from linking themselves to an established exam brand with global recognition... I am keen to see new higher education institutions: the experience of other countries suggests that non-traditional higher education institutions can widen participation, reduce costs and raise standards. It could be easier to guarantee this if new HEIs also had access to the security, quality-assurance and reputation that comes with externally-examined degrees. And there could be a real competitive challenge to universities, forcing them to focus more on teaching... I also believe that this approach could improve social mobility. Success in prestigious, externally-set degrees would boost opportunities for students who cannot move away from home. Studying near one's home isn't always the best choice at the moment but if local providers opted for teaching existing highly-regarded degrees, it could improve students' employability" (Willetts, 2010).

On 12 October 2010 the Browne report was released, recommending, inter alia, wider pricing flexibility for higher education institutions, and a strengthened approach to accountability for quality. Of particular note is the recommendation to replace the Higher Education Funding Council for England (HEFCE), the Quality Assurance Agency (QAA), the Office for Fair Access (OFFA) and the Office of the Independent Adjudicator (OIA) with a new Higher Education Council. The HE Council is to have "five core responsibilities: investing in priority courses; setting and enforcing baseline quality levels; delivering improvements on the access and completion rates of students from disadvantaged backgrounds; ensuring that students get the benefits of more competition in the sector; and resolving disputes between students and institutions" (Browne, 2010).

With regard to baseline quality levels across the whole higher education sector, the Browne report argues that "the regulation of quality is central to the credibility of the higher education system":

"Students and the public will invest in higher education; they will have to be assured that investment is not being wasted on substandard provision. Maintaining minimum quality standards also protects institutions which invest in quality provision from unfair competition by providers who cut corners" (Browne, 2010).

The report also suggests a stronger approach to the setting and monitoring of minimum standards, along the lines of quality-specifications for the purchasing of courses:

"The system we propose envisages targeted investment in priority subjects. It is important that institutions do not take public money to offer these priority courses and then fail to equip students with the skills and knowledge that the investment was supposed to procure. The HE Council will therefore define minimum levels of quality for these programmes. This will mean setting basic programme content requirements e.g. minimum number of laboratory hours for applied science courses—which institutions need to meet in order for the programmes they provide to be eligible for direct public investment. Content requirements will be reviewed periodically, or in the case of student concerns over quality" (Browne, 2010).

Additionally, future funding will be conditional on higher education teaching staff being formally qualified:

"It will be a condition of receipt of income from the Student Finance Plan for the costs of learning that institutions require all new academics with teaching responsibilities to undertake a teacher training qualification accredited by the HE Academy, and that the option to gain such a qualification is made available to all staff—including researchers and postgraduate students—with teaching responsibilities" (Browne, 2010).

3.3 Developments in the OECD

The OECD Education Directorate contends that the available comparative indicators of higher education effectiveness—e.g. type and number of degrees awarded, research outputs produced, or labour-market returns to higher education—are imperfect proxies of student learning outcomes (Nusche, 2008). It notes that institutional rankings (such as the *Shanghai Jiao Tong* and *Times Higher* rankings) are biased towards input factors and research, and are influenced by subjective factors such as institutional reputation. It suggests that indicators of student satisfaction reflect cultural and historical expectations, and may well be inversely correlated with intellectual stretch. It argues that labour market outcomes for graduates—employment and income benefits—are not only sensitive to local economic circumstances (Yelland, 2010) but also reflect the ‘screening’ function of Higher Education as well as its ‘human capital formation’ function.

A focus on learning outcomes (defined in terms of competence acquisition) totally independent of the learning context and the benefits achieved by graduates is regarded as “a promising direction” (Yelland, 2010). Ambitiously, the OECD initiative, Assessment of Higher Education Learning Outcomes (AHELO), aims to “assess the feasibility of capturing learning outcomes on an international scale by creating measures that would be valid for all cultures and languages” (Yelland, 2010).

Part of the explanation for this approach can be seen in the view of the expert group convened by the OECD in 2007 that generic skills, such as critical thinking, analytic reasoning and problem-solving, can be tested reliably across institutional, occupational and cultural contexts:

“The kind of competencies to be covered and the methods to be employed could be similar to those used for the Collegiate Learning Assessment Project (CLA). A key advantage is that such competencies are largely invariant across occupational and cultural contexts and could be applied across higher education institutions, departments and faculties. Since such assessments capture, at least to some extent, the cumulative learning outcomes of prior schooling, they should be combined with data on prior learning, for which the CLA provides methods as well” (OECD, 2007).

However, the expert group noted the limitation of an assessment approach entirely based on generic competencies, and the risk that “what is measured becomes too far removed from what goes on in faculties and departments and does not capture the competencies that are uniquely the province of the institutions” (OECD, 2007).

Hence the group recommended a second strand to assess discipline-related competences, noting that such an approach “would require highly differentiated assessment instruments, which would make comparisons across institutions and countries difficult” (OECD, 2007). The experts suggested that, whatever the disciplines chosen, the aim would be to assess competencies that are fundamental and “above content”, i.e. with the focus on the capacity of students to extrapolate from what they have learned and apply their competencies in novel contexts unfamiliar to them, an approach that is similar to the Programme for International Student Assessment (PISA) which focuses on the scholastic performance of 15 year old school students (OECD, 2007).

...generic skills, such as critical thinking, analytic reasoning and problem-solving, can be tested reliably across institutional, occupational and cultural contexts...

Nevertheless, there are contentious assumptions of the Education Directorate’s preferred PISA-like approach transported to Higher Education, as if what is measurable can capture more than the least important dimensions of learning, that competences ‘above content’ are substantive, that value-added can be meaningfully aggregated across different student cohorts, and written tests can be culturally neutral. Hence, the OECD asserts that AHELO is not a pilot exercise but rather a proof of concept and practicality (Yelland, 2010).

3.3.1 AHELO feasibility study

The feasibility study is scheduled for implementation in 2010-11. It will target a population of students who are near the end of their first 3-4 year degree. The assessment will be done at an institutional level and will be based on a written test of competences.

The AHELO feasibility study comprises four strands: (i) generic skills; discipline-specific strands in (ii) engineering and (iii) economics; and (iv) a value-added strand.

The generic skills strand will be tested using a version of the US Collegiate Learning Assessment (CLA), adapted to the international context. The Council for Aid to Education based in New York City has been awarded a US\$1.2 million contract to develop an international version of the (CLA).

For the assessments of engineering and economics, contextual data will be used to obtain information on the context for learning in the following domains:

- Physical and organisational characteristics: Observable characteristics such as enrolment numbers or the ratio of male students to female students.
- Education-related behaviours and practices: Student-staff interaction, academic challenge, emphasis on applied work.
- Psychosocial and cultural attributes: Career expectations of students, parental support, social expectations of higher education institutions.
- Behavioural and attitudinal outcomes: Students' persistence and completion of degrees; continuation into graduate programs or success in finding a job; student satisfaction, improved self-confidence, and self-reported learning gains claimed by students or their instructors.

The value-added strand is the most complex and least developed at this point. The OECD states that "this strand of work will...reflect on possible methodologies, drawing upon similar work that has already been carried out by the OECD at the secondary education level. Researchers will consider the merits of existing methodologies, and examine psychometric evidence...on the basis of existing data collected at the national level" (Yelland, 2010).

As of March 2010, the following countries had agreed to commit institutions to participate in the following strands of the feasibility study:

- *Generic Skills (CLA)*: Finland, Korea, Kuwait, Mexico, Norway and the United States (Connecticut, Massachusetts, Missouri, and Pennsylvania).
- *Engineering*: Australia, Japan, Sweden.
- *Economics*: Belgium (Flemish Community), Italy, Mexico (to be confirmed), the Netherlands and the Russian Federation.

The OECD is asking each country/state participating in the feasibility study to contribute €150,000. It has also obtained financial support from the Lumina Foundation in the US.

The AHELO project is contentious within the OECD as well as with the wider Higher Education community. The European U-Map project, for instance, questions whether sufficient regard will be given to "the diversity that characterises most higher education systems, in particular with respect to the type of students accepted (admissions selectivity, demographic profile) and the different institutional profiles and missions (such as research versus teaching intensiveness). A lack of data on institutional differences would bias the validity of results" (van Vught, et al., 2010). Standardised testing and the CLA instrument are also the subject of criticism within the US, as indicated below.

3.3.2 IMHE: Supporting Quality Teaching in Higher Education

The Institutional Management in Higher Education (IMHE) program is a unique group within the OECD, as it comprises individual institutions of higher education rather than governmental bodies, and develops a bottom-up agenda rather than a governmentally-driven top-down agenda. However, in recent years the IMHE has been pulled within the OECD Education Directorate as another arm for the pursuit of governmental objectives, notably through AHELO, wherein its members are somewhat compromised.

The Supporting Quality Teaching in Higher Education project is a benchmarking exercise focusing on institution-level and department-level initiatives to improve teaching quality. A primary driver of the initiative is to counter what is seen to be a disproportionate focus on research in published rankings of higher education institutions (OECD, 2010). Phase 1 of the project involved a literature review, and online questionnaire, follow-up interviews, site visits and a dedicated conference. There are 29 volunteering institutions, including: Macquarie University from Australia; the Institute of Education, University of London; and University of Teesside from the UK; and Alverno College, City University of Seattle, and University of Arizona from the US. An overview of institutional policies and initiatives has been published (OECD, 2010).

A primary driver of the initiative is to counter what is seen to be a disproportionate focus on research in published rankings of higher education institutions.

3.4 Developments in the United States of America

Concern about what and how much students are learning in US colleges and universities continues to be expressed in public debate (see Box 20), with occasional calls for governments to mandate the reporting of student performance using tests and surveys fitting to the purposes of different Higher Education institutions. Carey puts a case for improving the transparency of performance and price information (value for money information) as a means of exploiting more widely the benefits of on-line learning technologies and processes (Carey, 2010).

Earlier concerns were raised in the mid 1980s with the formation of an “assessment movement” in higher education (Ewell, 2001). Four particular factors came into play at that time. The first was an extension up the grade ladder of public concern about under-performance in the K-12 schooling sector. The second was a growing employer interest in the preparedness of a ‘21st Century workforce’, with the expansion of occupations for which school education was no longer sufficient. The third and related factor was the growth in forms of achievement-based credentials in professional and technical fields, and the need for ways of evaluating equivalences for credit transfer and further student learning. Fourth, the increasing use of distance education, gave rise to the need for institutions to demonstrate equivalence between on-campus instruction and other modes of learning:

“As distance delivery became asynchronous and student-centred, demonstrated student mastery of the subject matter became the only way in which academic progress could be judged. The result has been increasing pressure on accreditors to develop review approaches that are capable of looking at instructional programs that are not anchored in ‘seat time’, and that involve resource levels and configurations quite different from those which established standards were designed to address” (Ewell, 2001).

The 1983 publication of *A Nation at Risk: The Imperative for Educational Reform* by the US Department of Education put American higher education on notice that either the providing institutions would have to develop effective ways of assessing student learning or the government would impose a standardised means of doing so (Hamilton & Banta, 2008). From the 1980s, regional accrediting agencies in the US began to adopt a different approach to accrediting standards, shifting from a focus on desirable organisational characteristics to pay attention to the actual results or ‘outcomes’ of institutional efforts (Stella & Woodhouse, 2006). In 1989, the US Department of Education required for the first time that accrediting organisations examine student learning outcomes as a condition of institutional accreditation, with a desire to set a threshold standard below which an institution is deemed unacceptable. However, this approach made accreditation “somewhat irrelevant to institutions performing above the threshold” (Woodhouse, 2006).

Box 20. The need for comparable information about student attainment

“The biggest problem with American higher education (is) that too many of the students who do enroll aren’t learning very much and aren’t earning degrees. For the average student, college isn’t nearly as good a deal as colleges would have us believe. Nobody knows which colleges really do the best job of taking the students they enroll and helping them learn over the course of four years... As a result, colleges are far less focused on student learning than they should be, and consumers haven’t a clue what to do and have come to believe, mistakenly, that the most expensive colleges are also the best. The near-total lack of useful information about teaching and learning has three main effects, all bad for students. First, it creates distortions in the higher-education market that drive up prices. Second, it gives colleges free rein to ignore their teaching obligations in favor of a mad contest for status and self-gratification. Third, it leaves colleges that serve the most disadvantaged students with the fewest resources.

The solution is to gather much more comparable, publicly available information about teaching and learning. That would allow institutions to pursue a robust, value-based marketing strategy, to make the case that their learning results meet or exceed other, more expensive competitors. It would also open up the market to new

competition. Information-poor, reputation-driven markets penalize new entrants, who have to wait for public perception to catch up with reality. This is particularly difficult when the industry leaders opened up shop in the seventeenth century. Online higher education offers new avenues for competition, and that segment of the industry is rapidly expanding. But lack of information about learning is hurting students by creating ample space for charlatans and scam artists to operate while simultaneously tarring the best online educators with the taint of the unproven and new.

The federal government should make major new investments in research development to create new survey and testing instruments like National Survey of Student Engagement (NSSE) and the Collegiate Learning Assessment (CLA). Once the data systems and new instruments have been developed and fine-tuned, Congress should insist that all colleges and universities accepting federal funds regularly report teaching, learning, and long-term student employment results. It wouldn't be a one-size-fits-all process—colleges serve a diverse array of students and have a wide variety of scholarly and social missions. Each would have discretion to pick measures that fit who they are and what they do. But the measures would have to be credible, comparable, and publicly available.”

Carey, K. (2010).

3.4.1 The Spellings Commission

Further impetus to improve Higher Education performance information and the comparability of student attainment was given by the Spellings Commission in 2006. A significant motivation behind the Spellings Commission's formation by the Bush administration was the fear that the American higher education system is deteriorating, failing to prepare the American workforce for the rigours of the globalised marketplace, and falling behind its competitor countries (see Box 21). The report referred to “a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students.” It called for a major program of cost-cutting and productivity improvements and the creation of a “consumer-friendly database” so that parents and students can compare institutions on “how much students learn in colleges or whether they learn more at one college than another.” The database could eventually contain data such as the “learning outcomes of students” creating a nationwide system for comparative performance purposes, using standard formats. The Commission argued that colleges might have a more vested interest in the success of their students if this information were made public to prospective students and their parents (American Council on Education, 2008).

...“a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students.”

Box 21. The Spellings Commission's diagnosis of malaise in US Higher Education

“We are losing some students in our high schools, which do not yet see preparing all pupils for postsecondary education and training as their responsibility.

Others don't enter college because of inadequate information and rising costs, combined with a confusing financial aid system that spends too little on those who need help the most.

Among high school graduates who do make it on to postsecondary education, a troubling number waste time—and taxpayer dollars—mastering English and math skills that they should have learned in high school. And some never complete their degrees at all, at least in part because most colleges and universities don't accept responsibility for making sure that those they admit actually succeed.

As if this weren't bad enough, there are also disturbing signs that many students who do earn degrees have not actually mastered the reading, writing, and thinking skills we expect of college graduates. Over the past decade, literacy among college graduates has actually declined. Unacceptable numbers of college graduates enter the workforce without the skills employers say they need in an economy where, as the truism holds correctly, knowledge matters more than ever.

The consequences of these problems are most severe for students from low-income families and for racial and ethnic minorities. But they affect us all.

Compounding all of these difficulties is a lack of clear, reliable information about the cost and quality of postsecondary institutions, along with a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students. The result is that students, parents, and policymakers are often left scratching their heads over the answers to basic questions, from the true cost of private colleges (where most students don't pay the official sticker price) to which institutions do a better job than others not only of graduating students but of teaching them what they need to learn."

Beyond high school, more students than ever before have adopted a "cafeteria" approach to their education, taking classes at multiple institutions before obtaining a credential. And the growing numbers of adult learners aren't necessarily seeking degrees at all. Many simply want to improve their career prospects by acquiring the new skills that employers are demanding. In this consumer-driven environment, students increasingly care little about the distinctions that sometimes preoccupy the academic establishment, from whether a college has for-profit or non-profit status to whether its classes are offered online or in brick-and-mortar buildings. Instead, they care—as we do—about results."

US Department of Education (2006), *A Test of Leadership: Charting the Future of US Higher Education*. A Report of the Commission Appointed by Secretary of Education Margaret Spellings. Washington. DC.

The findings and recommendations of the Spellings Commission that are relevant to the matters covered by this paper are 'learning' and 'transparency and accountability'. Extracts from the 2006 report are presented below.

Learning

"As other nations rapidly improve their higher education systems, we are disturbed by evidence that the quality of student learning at US colleges and universities is inadequate and, in some cases, declining. A number of recent studies highlight the shortcomings of postsecondary institutions in everything from graduation rates and time to degree to learning outcomes and even core literacy skills. According to the most recent National Assessment of Adult Literacy, for instance, the percentage of college graduates deemed proficient in prose literacy has actually declined from 40 to 31 percent in the past decade. These shortcomings have real-world consequences. Employers report repeatedly that many new graduates they hire are not prepared to work, lacking the critical thinking, writing and problem-solving skills needed in today's workplaces. In addition, business and government leaders have repeatedly and urgently called for workers at all stages of life to continually upgrade their academic and practical skills. But both national and state policies and the practices of postsecondary institutions have not always made this easy, by failing to provide financial and logistical support."

"Students must have clearer pathways among educational levels and institutions and we urge colleges to remove barriers to student mobility and promote new learning paradigms (e.g., distance education, adult education, workplace programs) to accommodate a far more diverse student cohort. States and institutions should review and revise standards for transfer of credit among higher education institutions, subject to rigorous standards designed to ensure educational quality, to improve access and reduce time-to-completion."

Transparency and Accountability

"We have noted a remarkable shortage of clear, accessible information about crucial aspects of American colleges and universities, from financial aid to graduation rates. Because data systems are so limited and inadequate, it is hard for policymakers to obtain reliable information on students' progress through the educational pipeline. This lack of useful data and accountability hinders policymakers and the public from making informed decisions and prevents higher education from demonstrating its contribution to the public good."

"We believe that improved accountability is vital to ensuring the success of all the other reforms we propose. Colleges and universities must become more transparent about cost, price, and student success outcomes, and must willingly share this information with students and families. Student achievement, which is inextricably connected to institutional success, must be measured by institutions on a "value-added" basis that takes into account students' academic baseline when assessing their results. This information should be made available to students, and reported publicly in aggregate form to provide consumers and policymakers an accessible, understandable way to measure the relative effectiveness of different colleges and universities."

"Our complex, decentralized postsecondary education system has no comprehensive strategy, particularly for undergraduate programs, to provide either adequate internal accountability systems or effective public information. Too many decisions about higher education—from those made by policymakers to those made by students and families—rely heavily on reputation and rankings derived to a large extent from inputs such as financial resources rather than outcomes. Better data about real performance and lifelong working and learning ability is absolutely essential if we are to meet national needs and improve institutional performance."

"Traditionally, institutional quality is measured primarily through financial inputs and resources. In today's environment, these measures of inputs are no longer adequate, either within individual institutions or across all of higher education. Despite increased attention to student learning results by colleges and universities and accreditation agencies, parents and students have no solid evidence, comparable across institutions, of how much students learn in colleges or whether they learn more at one college than another. Similarly, policymakers need more comprehensive data to help them decide whether the national investment in higher education is paying off and how taxpayer dollars could be used more effectively."

"The commission supports the development of a privacy-protected higher education information system that collects, analyzes and uses student-level data as a vital tool for accountability, policy-making, and consumer choice. A privacy-protected system would not include individually identifiable information such as student names or Social Security numbers at the federal level. Such a system would allow policymakers and consumers to evaluate the performance of institutions by determining the success of each institution's students without knowing the identities of those students. It is essential for policymakers and consumers to have access to a comprehensive higher education information system in order to make informed choices about how well colleges and universities are serving their students, through accurate measures of individual institutions' retention and graduation rates, net tuition price for different categories of students, and other important information. Right now, policymakers, scholarly researchers, and members of the public lack basic information on institutional performance and labor market outcomes for postsecondary institutions. This is particularly true for measuring outcomes from the work of those institutions that serve the growing proportion of nontraditional students who do not begin and finish their higher education at the same institution within a set period of time."

"Student achievement, which is inextricably connected to institutional success, must be measured by institutions on a "value-added" basis that takes into account students' academic baseline when assessing their results. This information should be made available to students, and reported publicly in aggregate form to provide consumers and policymakers an accessible, understandable way to measure the relative effectiveness of different colleges and universities."

The main recommendations of the Spellings Commission regarding the measurement and reporting of student learning outcomes are reproduced at Box 22.

Box 22. Spellings Commission Recommendations on measuring and reporting student learning outcomes

- The federal government should provide incentives for states, higher education associations, university systems, and institutions to develop interoperable outcomes-focused accountability systems designed to be accessible and useful for students, policymakers, and the public, as well as for internal management and institutional improvement
- Higher education institutions should measure student learning using quality-assessment data from instruments such as, for example, the Collegiate Learning Assessment, which measures the growth of student learning taking place in colleges, and the Measure of Academic Proficiency and Progress, which is designed to assess general education outcomes for undergraduates in order to improve the quality of instruction and learning.
- Faculty must be at the forefront of defining educational objectives for students and developing meaningful, evidence-based measures of their progress toward those goals. The results of student learning assessments, including value-added measurements that indicate how much students' skills have improved over time, should be made available to students and reported in the aggregate publicly. Higher education institutions should make aggregate summary results of all postsecondary learning measures, e.g., test scores, certification and licensure attainment, time to degree, graduation rates, and other relevant measures, publicly available in a consumer-friendly form as a condition of accreditation.
- The collection of data from public institutions allowing meaningful interstate comparison of student learning should be encouraged and implemented in all states. By using assessments of adult literacy, licensure, graduate and professional school exams, and specially administered tests of general intellectual skills, state policymakers can make valid interstate comparisons of student learning and identify shortcomings as well as best practices. The federal government should provide financial support for this initiative.
- The National Assessment of Adult Literacy (NAAL) should be administered by US Department of Education at five- instead of ten-year intervals. The survey sample should be of sufficient size to yield state-by-state as well as national results. The NAAL should also survey a sample of graduating students at two and four-year colleges and universities and provide state reports.
- Accreditation agencies should make performance outcomes, including completion rates and student learning, the core of their assessment as a priority over inputs or processes. A framework that aligns and expands existing accreditation standards should be established to (i) allow comparisons among institutions regarding learning outcomes and other performance measures, (ii) encourage innovation and continuous improvement, and (iii) require institutions and programs to move toward world-class quality relative to specific missions and report measurable progress in relationship to their national and international peers. In addition, this framework should require that the accreditation process be more open and accessible by making the findings of final reviews easily accessible to the public and increasing public and private

Higher education institutions should measure student learning using quality-assessment data from instruments such as, for example, the Collegiate Learning Assessment, which measures the growth of student learning taking place in colleges, and the Measure of Academic Proficiency and Progress, which is designed to assess general education outcomes for undergraduates in order to improve the quality of instruction and learning.

sector representation in the governance of accrediting organizations and on review teams. Accreditation, once primarily a private relationship between an agency and an institution, now has such important public policy implications that accreditors must continue and speed up their efforts towards transparency as this affects public ends.

US Department of Education (2006), *A Test of Leadership: Charting the Future of US Higher Education*. A Report of the Commission Appointed by Secretary of Education Margaret Spellings. Washington. DC.

3.4.2 Developments after Spellings

On 20 June 2007 Margaret Spellings wrote to Republican Senator Lamar Alexander (Tennessee) indicating that she would not propose new accreditation rules. In the context of the report of the Spellings Commission on the Future of Higher Education and other calls for increased accountability, accreditation was one of the most controversial topics in reauthorisation of the *Higher Education Act* in 2008. The amended Act now makes it explicit that threshold standards required for accreditation are distinct from the standards that institutions set for themselves in respect of student attainment:

"The act reflects the essential historic distinction and collaborative relationship between institutional standards and accreditation standards regarding student achievement. An institution sets its own specific standards and measures consistent with its mission and within the larger framework of the accreditation standards. In consultation with institutions, accreditors set common standards that are used to review all of the institutions they accredit. The act forbids the Education Department from establishing criteria that specify, define or prescribe the standards accreditors use in assessing an institution's success with respect to student achievement" (American Council on Education, 2008).

The Spellings approach was seen as increasing the regulatory burden on institutions, strengthening federal powers relative to the states, and reducing diversity (Reeves, 2006; AAUP, 2006). Nevertheless, there was some support for increased standardisation, including on progressive grounds, with a particular focus on building enabling capabilities and improving the quality of information available to help students navigate a diverse higher education system:

"...attacks on educational standardization simply mirror and reinforce American education's disconnected, fragmented status quo. American colleges today can indeed be proud of their impressive intellectual and disciplinary diversity. What is far less impressive, however, is their record in helping students negotiate that diversity by providing them with the skills needed to make sense of it" (Graff & Birkenstein, 2008).

The Spellings approach was seen as increasing the regulatory burden on institutions, strengthening federal powers relative to the states, and reducing diversity.

In the post-Spellings context, the Higher Education Opportunity Act (HEOA) requires all postsecondary institutions participating in Title IV federal student aid programs to post a net price calculator on their websites by October 29, 2011. Additionally, the amended Act (Title 20, 1015e) makes provision for a State Higher Education Information System Pilot, in up to five states, to "improve the capacity of States and institutions of higher education to generate more comprehensive and comparable data, in order to develop better-informed educational policy at the State level and to evaluate the effectiveness of institutional performance". The Congressional prohibitions against prescribing national standards and associated assessments, which were written into HEOA on the initiative of Senator Lamar Alexander in 2007, remain in effect.

On 31 July 2008, Congress completed reauthorisation of the Higher Education Act (HEA) by passing the Higher Education Opportunity Act (HEOA). The HEOA reauthorises HEA provisions for six years, through September 30, 2014. The main provisions of the HEOA, relevant to the topics of this paper, as summarised by the American Council on Education (ACE, 2008), are outlined below:

Accreditation

- **Student achievement:** The act reflects the essential historic distinction and collaborative relationship between institutional standards and accreditation standards regarding student achievement. An institution sets its own specific standards and measures consistent with its mission and within the larger framework of the accreditation standards. In consultation with institutions, accreditors set common standards that are used to review all of the institutions they accredit. The act forbids ED from establishing criteria that specify, define or prescribe the standards accreditors use in assessing an institution's success with respect to student achievement.
- **Due process:** The act prescribes due process procedures for adverse actions by accreditors. For example, an accreditor's appeal body must be separate from its initial decision-making body and must be subject to a conflict of interest policy. Accreditors must allow institutions to submit new evidence during an appeal process when the accreditor's adverse action is based solely on failure to meet financial standards and new evidence consists of "significant financial information" unavailable before the adverse action.
- **Distance education:** ED shall not require an accreditor to have separate standards, procedures or policies for evaluation of distance education. Accreditors must, however, require institutions that offer distance education to establish that a student registered for a distance education course is the same student who completes and receives credit for it.
- **Respect for mission:** The act requires accreditors to apply standards that respect the stated mission of institutions, including religious missions.
- **Transparency in accreditation:** Accreditors must make publicly available a summary of their actions, including adverse actions such as denial or withdrawal, the reasons for the adverse action and the affected institution's official comments concerning final denial or withdrawal of accreditation.
- **National Committee on Institutional Quality and Integrity (NACIQI):** The act restructures NACIQI, which advises ED on recognition of accreditors and related matters. In the past, the secretary of education has appointed all NACIQI members. Under the act, the secretary and members of the House of Representative and the Senate from both parties will appoint 12 members (six from each body). Membership will expand from 15 to 18 and appointment terms will increase from three to six years. Current members' terms will end on the date of enactment of the act. New members cannot be appointed until January 31, 2009.
- **Diploma mills:** The Act defines "diploma mill" for the first time. ED will maintain information and resources on its web site to help students, families and employers identify and avoid diploma mills, and will continue to participate in interagency efforts to combat them.

The act forbids ED from establishing criteria that specify, define or prescribe the standards accreditors use in assessing an institution's success with respect to student achievement.

President Obama's first speech to a joint session of the Congress on 24 February 2009 addressed "the urgent need to expand the promise of education in America" and raise levels of educational attainment (see Box 23).

Box 23. President Obama's challenge on post-secondary attainment

"In a global economy where the most valuable skill you can sell is your knowledge, a good education is no longer just a pathway to opportunity—it is a prerequisite. Right now, three-quarters of the fastest-growing occupations require more than a high school diploma. And yet, just over half of our citizens have that level of education. We have one of the highest high school dropout rates of any industrialized nation. And half of the students who begin college never finish. This is a prescription for economic decline, because we know the countries that out-teach us today will out-compete us tomorrow.

That is why it will be the goal of this administration to ensure that every child has access to a complete and competitive education—from the day they are born to the day they begin a career. That is a promise we have to make to the children of America. Already, we've made an historic investment in education through the economic recovery plan. We've dramatically expanded early childhood education and will continue to improve its quality, because we know that the most formative learning comes in those first years of life. We've made college affordable for nearly seven million more students—seven million. And we have provided the resources necessary to prevent painful cuts and teacher layoffs that would set back our children's progress.

We know that our schools don't just need more resources. They need more reform. That is why this budget creates new teachers—new incentives for teacher performance; pathways for advancement, and rewards for success. We'll invest in innovative programs that are already helping schools meet high standards and close achievement gaps. And we will expand our commitment to charter schools.

It is our responsibility as lawmakers and as educators to make this system work. But it is the responsibility of every citizen to participate in it. So tonight, I ask every American to commit to at least one year or more of higher education or career training. This can be community college or a four-year school; vocational training or an apprenticeship.

But whatever the training may be, every American will need to get more than a high school diploma. And dropping out of high school is no longer an option. It's not just quitting on yourself, it's quitting on your country—and this country needs and values the talents of every American. That's why we will support—we will provide the support necessary for all young Americans to complete college and meet a new goal: By 2020, America will once again have the highest proportion of college graduates in the world."

President Barak Obama. Address to the Joint Session of Congress, 24 February 2009.

The Bush administration's rationale for performance reporting was largely couched in consumer-economy terms: "potential students and their parents would use outcomes information to help them shop for a college or university, and the effects of their choices on market forces would steer institutional behavior" (Ewell, 2009). One major perceived difference between the Obama and Bush White Houses is that "while the Bush administration often seemed to dislike and disparage higher education, the Obama administration will be tough on colleges because its officials value higher education and believe it needs to perform much better, and successfully educate many more students, to drive the American economy" (Lederman, 2010a). Another difference is that the Obama administration is more interested in the contribution of postsecondary attainment to the competitive capacity of the US. The President's 2009-10 Budget Request includes a new College Access and Completion Fund to build partnerships to improve students' success in and completion of college, particularly students from disadvantaged backgrounds. The Budget Request includes \$500 million in Fiscal Year 2010 and proposes a \$2.5 billion, five-year initiative. Institutions can expect more rigorous reporting requirements relating to student success. However, to date the indications

...the Obama administration will be tough on colleges because its officials value higher education and believe it needs to perform much better...

from the Obama administration are indirect in respect of any intention to revisit the national standards agenda, particularly through standardised testing and related comparative performance reporting, but there are sufficient indications such that “colleges and universities cannot afford to stop their own quest to develop meaningful evidence of student learning” (Lederman, 2010a).

At the beginning of 2010 it was being reported that “State policy makers, parents and others—troubled by continually rising prices and low completion rates, and worried about whether students are being well prepared for work and life—grow less and less willing to accept colleges’ traditional assertions to “trust them” that students are learning” (Lederman, 2010a). For their part, many higher education institutions have been intensifying their assessment of student learning, although their efforts may be seen to be piecemeal and inwardly focused: “assessment activity on campuses can be found in nooks and crannies of the institutions—by individual professors, or in one department—and it is often not tied to goals set broadly at the institutional level” (Lederman, 2010b). Hence, a new imperative is penetrating the contemporary thinking of university and college leaders: on the one hand, institutions must adopt a more integrated approach to assessment linked to the learning goals that students should derive from the curriculum; and on the other hand, they must seriously address the comparability goal on which policy makers insist to hold institutions accountable:

“A legitimate process for evaluating learning outcomes has to...be consistent, it needs to be understandable to someone other than the institution itself, and...it needs to be judged relative to some kind of standard” (Kevin Carey Address to the Council for Higher Education Accreditation (CHEA) meeting, January 2010, reported in Lederman, 2010a).

The Bush administration’s accountability strategy is seen by many current leaders to have been ill-advised because “it emphasized assessment over standards—focusing on getting colleges to use common measurements of learning outcomes and envisioning a federal role in defining what students should know ” (Lederman, 2010a). An alternative approach to the Bush administration’s preference for standardised testing as the best way to persuade the public (and politicians) that meaningful learning is taking place, is under active consideration and, in some areas, piloting. This approach involves “making transparent the professional judgments that instructors make about their students’ work”:

“Given the technology that is available today, it is not difficult to imagine panels of experts reviewing the grades and scores that professors at different institutions have given to their students, with the goal of “anchoring” in the norms of the field the professors’ judgments about how successfully the students have achieved a set of common learning goals. Countries such as Singapore and Ireland have adopted such approaches, getting away from having no standards to having standards that are tracked either by testing or by professional judgment that is transparent. You anchor the judgment by being public with others who share the responsibility for teaching and learning—not the federal government, and not the testing companies” (Peter McWalters, reported in Lederman, 2010a).

“Countries such as Singapore and Ireland have adopted such approaches, getting away from having no standards to having standards that are tracked either by testing or by professional judgment that is transparent.”

The Obama administration is seen to have “quietly endorsed and expanded its predecessor’s push to get states to build student databases that are designed, first and foremost, as accountability tools to produce better data on how students move (or don’t) through the educational pipeline” (Lederman, 2010a). At a national conference of accrediting bodies in January, the Under Secretary of Education, Martha J. Kanter, is reported to have echoed many of the criticisms that her predecessors in the Bush administration made of higher

education's process of self-governance, saying that "accreditation is not transparent enough" and urging higher education to "join us in working toward a modern 'culture of accountability.'" Kanter called for the self-studies that colleges produce in accreditation to be made public (Lederman, 2010a).

The smouldering distrust between the accrediting bodies and the US Department of Education was reignited by the Department issuing in February a 76-page draft "Guide to the Accrediting Agency Recognition Process" which the accreditors regarded as too prescriptive and "a backdoor way to avoid Congressional limitations on the government's ability to regulate accreditors" (Lederman, 2010b).

At the Higher Learning Commission's annual meeting in April, national higher education leaders spoke in unison: "The federal government is dead serious about holding colleges and universities accountable for their performance, and can be counted on to impose undesirable requirements if higher education officials don't make meaningful changes themselves" (Lederman, 2010c). One of the speakers linked the Obama administration's approach to higher education to its approach to financial and environmental policy where previously weak regulation had led to catastrophe:

"...given that the pendulum has swung toward increased regulation in virtually all sectors of our society, and that the Education Department's recent actions have made clear that national and regional accreditors' ability to judge quality is under the microscope, we cannot lay low and hope that the glare of the spotlight will eventually fall on others. If we fail to act, it is likely that change will be imposed upon us, with potentially serious consequences for the governance structure that has allowed the United States to develop the best, most inclusive higher education system in the world" (Molly Broad, President of the American Council on Education, reported in Lederman, 2010c).

The shock to the academic community of the Bush administration's attempt "to remake institutional accreditation as an aggressive federal quality assurance tool" (Ewell, 2009) gave rise to post-Spellings initiatives "designed to re-assume the academy's responsibility for publicly assuring academic quality" (Ewell, 2009), such as the Voluntary System of Accountability, and the New Leadership Alliance for Student Learning and Accountability. These initiatives, designed to position higher education institutions in advance of the next HEA reauthorisation (in 2014) are taking on renewed relevance in the Obama presidency, but the directions for their development are hotly contested.

3.4.3 The Voluntary System of Accountability (VSA)

The Voluntary System of Accountability (VSA) is an initiative by public 4-year universities to supply basic, comparable information on the undergraduate student experience through a common web report—the College Portrait (see Box 24, and **Attachment B**). The VSA was developed in 2007 by a group of university leaders and is sponsored by two higher education associations—the Association of Public and Land-grant Universities (APLU) and the Association of State Colleges and Universities (AASCU). Development and start-up funding was provided by the Lumina Foundation. Beginning in 2010, the VSA is supported by the participating institutions through annual dues ranging from \$500 to \$2500 and based on total student enrolment (http://www.voluntarysystem.org/index.cfm?page=about_vsa).

Box 24. VSA College Portrait

I. Consumer Information

The data elements in the first three pages of the College Portrait template address the question: "What information would be most helpful to prospective students and their families in deciding which college or university best fits their educational wants and needs?" Costs of attendance, degree offerings, living arrangements, student characteristics, graduation rates, transfer rates, and post-graduate plans are included.

There are two innovations of particular note—the student success and progress rate and the college cost calculator. The success and progress rate provides a more complete picture of student progress through the higher education system rather than focusing on the graduation rate from only one institution. Such a measure

is increasingly valuable as the majority of students now attend more than one institution before they graduate. The college cost calculator is a tool for students and their families to more accurately estimate the net cost of attending a particular institution. Studies have demonstrated that many students, particularly low income students, do not consider attending college because they mistakenly believe the cost of attending is much higher than it actually is.

II. Student Experiences and Perceptions

The second section of *College Portrait* provides a snapshot of student experiences and activities and their perceptions of a particular college or university by reporting the results from one of four student engagement surveys. Links to other institutional evaluations of campus life are also provided.

Institutions will select one of four student surveys to conduct at its campus and report results within six specified constructs that academic research has shown to be correlated with greater student learning and development: group learning, active learning, experiences with diverse groups of people and ideas, student satisfaction, institution commitment to student learning and success, and student interaction with faculty and staff. Under each of the six constructs, student responses to specific questions will be reported to maintain rough comparability across survey instruments.

III. Student Learning Outcomes

The third section of the *College Portrait* template reports evidence of student learning in two ways. At the top of the page, institutions provide a description of how they evaluate student learning. This description includes links to institution-specific outcomes data such as program assessments and professional licensure exams.

Source: www.collegeportraits.org.

Note: VSA participants must include a net cost calculator within College Portrait by 31 December 2010.

VSA reflects a self-governing response to the community's need for transparency and accountability:

"State and federal policy makers and student or parent consumers of higher education services are increasingly calling for higher education to demonstrate what it says it delivers. While any long-term professional in higher education concludes, based on her or his experience, that it adds value in terms of student learning and student growth, the academy has not been able to effectively demonstrate and communicate this value added effect in a credible fashion to many in the above audiences"

(The American Association of State Colleges and Universities, 2008).

The objectives of the VSA are to:

- Provide a useful tool for students during the college search process
- Assemble and disseminate information that is transparent, comparable, and understandable
- Demonstrate accountability and stewardship to the public
- Support institutions in the measurement of educational outcomes and
- Facilitate the identification and implementation of effective practices as part of institutional improvement efforts (McPherson & Shulenburg, 2006a).

...a centrally mandated system "could result in inaccurate and unfair comparisons of institutions that serve different students, disciplines, and missions"

The principles underpinning the VSA are markedly different from those reflected in the approach of the Spellings Commission. A federally mandated testing system is seen to be harmful, as it is "is unlikely to recognize the important differences among institutions, be inflexible and cause damage to the vitality and independence of US higher education" (McPherson & Shulenburg, 2006a). Additionally, a centrally mandated system "could

result in inaccurate and unfair comparisons of institutions that serve different students, disciplines, and missions” (McPherson & Shulenburg, 2006a). The VSA allows for differentiation by type or classification of university or college, and for multiple measures to enable comparisons of like with like.

The VSA is experimenting with the use of different instruments for assessing higher education learning outcomes. The three tests chosen are:

- **Collegiate Assessment of Academic Proficiency (CAAP)**, two modules: critical thinking and writing an essay. CAAP is a product of The American College Testing Program, Inc.(ACT).
- **Collegiate Learning Assessment (CLA)**, complete test including a performance task and an analytic writing task (consisting of a make-an-argument and a critique-an-argument prompt). The CLA measures critical thinking, analytic reasoning, problem-solving, and written communication. CLA is a product of the Council for Aid to Education (CAE).
- **Measure of Academic Proficiency and Progress (MAPP)**, two sub scores of the test: critical thinking and written communication. MAPP is a product of Educational Testing Service (ETS).

In the 2007 pilot, 328 VSA participants measured critical thinking, analytic reasoning, and written communication using one of three tests. Reports at institutional level include a value-added calculation, based on a random sample of some 100-200 students. Learning gains or value-added scores reflect the difference between the actual and expected scores of graduating and entering students, taking into account the academic ability of the students. Each of the three testing organisations will use the same method to compute and characterise their learning gains or value-added scores for VSA purposes: *Well Above Expected, Above Expected, At Expected, Below Expected, and Well Below Expected*.

Two types of report are published by each VSA participating institution on College Portrait:

1. Learning Gains Between Freshman Year and Senior Year
2. Learning Gains Between Entering Transfer Students and Senior Transfer Students

The increase in learning on the performance task was what would be expected at an institution with students of similar academic abilities. The increase in learning on the analytic writing was at an institution with students of similar academic abilities.

There has been considerable debate and research into the various conceptual, policy and methodological issues involved, particularly with regard to the contentious matter of assessing value-added (see Box 25).

Box 25. Measuring Institutional Value-Added in Higher Education

“Of course many things happen to a student between the freshman and senior years that are unrelated to the education provided by the university, e.g., travel, development of a wider social network, summer and academic year jobs, and each of these may have an effect on standardized test scores. Nonetheless, it is clear that selecting one of the normalization techniques is required to refine the measurement such that it comes closer to approximating only the value added by the university.

We are aware that controversy surrounds value-added measurements. Measurement difficulties do not diminish our resolve that value added is the appropriate outcome measure upon which to focus. It does mean that the developing science of value-added learning measurement must be sensitive to these relationships and that a value-added measure initially chosen by a university may have to be reconsidered as additional research results are amassed. One therefore must regard value-added measurement as still in the “experimental” stage.

Accordingly, we cannot at this time recommend the selection of a single test for all universities subscribing to a national public university accountability system. Instead, we recommend that a set of three or at most four outcomes tests be selected by the universities participating in VSA and that each university in the interim select the one test from that set that measures best the core educational outcomes goals that the school has designed its curriculum to produce.

Interpreting the meaning of specific test score performance levels may be problematic. Any value-added approach involves generating raw test scores, so the value-added focus we recommend does not preclude the availability of test score data. A serious problem that remains for general education assessment testing is the difficulty of ensuring that the students tested are motivated to perform at their best level while taking the tests. This problem is generally not a matter of concern when students are taking classroom exams or the ACT/ SAT or GRE exams as the test-takers are motivated by self-interest to do well. General education standardized exam performance, by contrast, has no impact on the test taker but may have consequences for the university.

Every campus naturally wants to show its best face and thus there will be the temptation to administer the test to non-random samples of students, e.g., to high-ability individuals. Unless uniform sample selection procedures are agreed to and rigorously observed on every campus, the willingness of campuses to participate in any general education assessment venture and particularly their willingness to make results public will be undermined.

Unfortunately, there are no standardized tests that measure campus-wide the value added for the entire undergraduate educational experience. Constructing such a test is extraordinarily difficult as campuses have diverse sets of majors and degree programs and the likelihood of getting agreement on common educational outcomes is low. In addition, the sheer number of majors at US universities is in the hundreds so the effort to develop a comprehensive suite of major-specific outcomes tests is mammoth.”

McPherson & Shulenburg, 2006a.

Note: The SAT Reasoning Test (formerly Scholastic Aptitude Test and Scholastic Assessment Test) is a standardised test, of critical reading, mathematics and writing skills, for college admissions in the United States. The ACT (American College Test) is a standardised test of English, mathematics, reading and science reasoning. The GRE (Graduate Record Exam) includes the GRE General Test and GRE Subject Tests (Biochemistry, Cell and Molecular Biology; Biology; Chemistry; Computer Science; Literature in English; Mathematics; Physics; Psychology). GRE scores are used for admission to graduate schools along with undergraduate records, letters of recommendation and other testimonials.

3.4.4 Dissent within the VSA ranks: opposition to standardised testing

The University of California was one of a number of institutions to reject standardised testing as the appropriate way to assess learning outcomes within the VSA: “using standardized tests on an institutional level as measures of student learning fails to recognize the diversity, breadth and depth of discipline-specific knowledge and learning that takes place in colleges and universities today” (Dynes, 2007).

The Consortium on Financing Higher Education (COFHE) also rejected standardised testing:

“Based on our experience, we are skeptical about efforts to make this kind of assessment through standardized tests, including those that purport to measure critical reasoning... [A]ssessment experts are far from agreement about whether ‘value added’ can be measured accurately across diverse institutions” (COFHE, 2008 cited in Thomson & Douglass, 2009).

Thomson & Douglass (2009), drawing on Klein, Benjamin & Shavelson (2007) point out the key assumptions underpinning the use of the CLA for comparing value added by higher education institutions:

- *“First, for accountability purposes, valid assessment of learning outcomes for students at an institution is only possible by rigorously controlling for the characteristics of those students at matriculation.*
- *Second, by using SAT scores as the control for initial student characteristics, given how well the CLA tests have been designed and validated as measures of general cognitive skills, it is possible on the basis of surprisingly small samples to calculate the difference between freshman and senior test performance and compare that difference to that predicted or expected on the basis of student characteristics at entry.*

- Third, this relative performance or value-added can in turn be compared to the relative performance or value added achieved at other institutions, hence providing the most valid or fair comparison of how well a college is performing in terms of student learning” (Thomson & Douglass, 2009).

However, testing of these assumptions, led them to conclude that:

“the CLA and the SAT are so highly correlated that the amount of variance in student learning outcomes to be accounted for after controlling for SAT scores is incredibly small and most institutions will simply be in the expected range. The results are also sample-dependent in ways not recognized by CLA (for example, student motivation). Finally, the design that compares the test performance of a sample of freshmen and a sample of seniors cannot isolate institutional value-added from other characteristics of institutions and their students that affect student learning, but have nothing directly to do with the instructional quality and effectiveness of an institution” (Thomson & Douglass, 2009).

...research over a long period “casts serious doubt on the validity of using standardized tests of general intellectual skills for assessing individual students, then aggregating their scores for the purpose of comparing institutions”.

Banta has suggested that research over a long period “casts serious doubt on the validity of using standardized tests of general intellectual skills for assessing individual students, then aggregating their scores for the purpose of comparing institutions” (Banta, 2007). Her findings (see Box 26) have led her to conclude that:

“standardized tests of generic intellectual skills do not provide valid evidence of institutional differences in the quality of education provided to students. Moreover, we see no virtue in attempting to compare institutions, since by design they are pursuing diverse missions and thus attracting students with different interests, abilities, levels of motivation, and career aspirations” (Banta, 2007).

Box 26. A warning on measuring learning outcomes

“Standardized tests of general intellectual skills (writing, critical thinking, etc.):

- test primarily entering ability (e.g., when the institution is the unit of analysis, the correlation between scores on these tests and entering ACT/SAT scores is quite high, ranging from .7 to .9), therefore differences in test scores reflect individual differences among students taking the test more accurately than they illustrate differences in the quality of education offered at different institutions.
- are not content neutral, thus disadvantage students specializing in some disciplines.
- contain questions and problems that do not match the learning experiences of all students at any given institution.
- measure at best 30% of the knowledge and skills faculty want students to develop in the course of their general education experiences.
- cannot be given to samples of volunteers if scores are to be generalized to all students and used in making important decisions such as the ranking of institutions on the basis of presumed quality.
- cannot be required of some students at an institution and not of others-yet making the test a requirement is the only way to ensure participation by a sample over time.”

If standardized tests of general intellectual skills are required of all students,

- and if an institution’s ranking is at stake, faculty may narrow the curriculum to focus on test content.
- student motivation to perform conscientiously becomes a significant concern.
- extrinsic incentives (pizza, stipends) do not ensure conscientious performance over time.

- ultimately, a requirement to achieve a minimum score on the test, with consequences, is needed to ensure conscientious performance. And if a senior achieves less than the minimum score, does that student fail to graduate despite meeting other requirements?

Banta, 2007.

The University of California has developed its own comprehensive Accountability Framework, including students' self-reported measures of learning obtained through the University of California Undergraduate Experience Survey (UCUES). A report on its usefulness for measuring learning outcomes related to the purpose and nature of academic programs and the characteristics of students concludes that institutionally linked measures of student learning can be meaningful for reporting purposes:

"The UCUES's census design, and the array of questions that can then be linked with a great variety of other institutional data (such as grades), may give institutions, such as the University of California, a better tool than standardized tests for gauging learning outcomes, at the campus-wide level, and perhaps most importantly at the level of the major or among specific demographic groups" (Brink et al. 2010).

Thomson and Douglass (2009) note that Margaret Spellings herself has recanted the Spellings Commission's 'one-size-fits-all' approach, asserting that "all colleges should be allowed to describe their own unique missions and be judged against that" (Spellings, 2008).

3.4.5 The new Leadership Alliance for Student Learning and Accountability

The Alliance, which was incorporated in March 2009, arose from a meeting in June 2007 convened by the Teagle Foundation, AAC&U and CHEA, of representative associations, accreditation agencies, researchers, and interested faculty and administrators. The purpose of the meeting was to examine whether the political climate around the Spellings Commission "warranted a more unified response to issues of effectiveness and assessment, transparency and accountability—turn the political pressure into an opportunity to develop more proactive, educationally valid approaches to improving student learning and reporting educational outcomes in ways that would address public concerns" (www.Newleadershipalliance.org, accessed 8 August 2010).

In January 2008, New Leadership for Student Learning and Accountability: A Statement of Principles, Commitments to Action was published. The document described challenges facing higher education, articulated broad principles concerning setting educational goals, gathering evidence, communicating results, and the roles and responsibilities of various stakeholders around these issues. It also suggested a number of broad actions that "to address the vital issues of transparency and accountability through rigorous attention to the performance of our colleges and universities." These included disseminating and promoting the New Leadership document, promoting greater definition and clarity with regard to educational goals, encouraging the continued development of accountability templates, promoting and publicising the range of assessment efforts, working with a variety of constituencies (philanthropy, government, business) on these issues, to "constantly monitor the quality of student learning and development, and use the results both to improve achievement and to demonstrate the value of our work to the public," and to "regularly report to the public on the overall progress made in achieving these actions."

The Alliance is focusing on three primary areas: certification, accountability templates, and network building. The certification initiative will create recognition for institutions that are leading the way on assessment and accountability, will help establish the norms for good practice and offer an incentive for institutions to develop assessment and accountability processes in a more systematic way. The Accountability Templates are designed to add to the reporting framework under the Voluntary System of Accountability and other systems.

3.4.6 Opposition to the VSA: revisiting the Spellings agenda

Referring to President Obama's February 2009 speech to the joint session of Congress, where he set a goal of raising postsecondary attainment to the world's highest level by 2020, Kelly & Aldeman (2010) suggest that American higher education faces a new challenge: "while previous reform efforts have focused on increasing *access* to higher education, increasing postsecondary *attainment* will require higher levels of college retention and completion; colleges and universities will have to do a better job of serving the students they enroll" (Kelly & Aldeman, 2010). They contend, referring to the Spellings' finding of "a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students" that voluntary arrangements for institutional accountability fall short of what the Obama challenge requires. With particular reference to the VSA, they identify three main deficiencies :

"Not all institutions participate, particularly those at the top and bottom of the quality scale. The site does not allow for the easy comparison of institutions, despite the fact that the database was created to facilitate consumer choice. And many of the most crucial VSA data elements are incomplete, non-comparable, or selected in a way that often obscures differences between institutions" (Kelly & Aldeman, 2010).

The first noted deficiency is the crucial one; the others can be addressed through procedural and technical means, if the participating institutions have the will. Kelly & Aldeman identify two basic options in the design of public policy for educational accountability: "a top-down system of government-mandated standards, assessments and rewards; or a more diffuse, market-oriented system where choices made by informed consumers help to regulate providers" (Kelly & Aldeman, 2010). With regard to the former, they contend that "this heavy-handed model is ill-suited to regulate a sector as diverse as higher education." With regard to the latter, they argue that the available information must cover all supply options. If America must lift the performance of its lowest performing institutions the community needs to know how far they fall below the highest performing institutions:

"...if market accountability is to compel low-performing schools to improve, it is important that consumers are able to compare quality and costs across the entire population of institutions, not only those that volunteer to become more transparent" (Kelly & Aldeman, 2010).

From this perspective, the VSA is seen more as a political tactic than a solution to the underlying problem: a "firebreak" designed to slow the momentum for a government-mandated accountability regimen:

"Since institutional interests drive the design and implementation of voluntary systems of accountability, these system are primarily designed to hold back prodding regulators, while consumer interests are likely to be a secondary concern" (Kelly & Aldeman, 2010).

While that may be a true motive, there are some difficulties with the Kelly & Aldeman line of argument. In large and diverse systems there is no straight line from bottom to top, as if the differences in what is being offered are differences only of degree. A linear approach to comparison cannot operate meaningfully because the important differences between institutions and programs in such systems are differences of kind. Consumers exert market pressure on price and service

"Not all institutions participate, particularly those at the top and bottom of the quality scale."

In large and diverse systems there is no straight line from bottom to top, as if the differences in what is being offered are differences only of degree. A linear approach to comparison cannot operate meaningfully because the important differences between institutions and programs in such systems are differences of kind.

primarily when they are shopping to buy within a product class where they can compare like with like. It is not evident in most markets that the competition among prestige goods helps improve the performance of those in the bargain basement.

3.4.7 Tuning USA

A subsequent initiative by Lumina Foundation, titled Tuning USA, is a faculty-led pilot project designed to define what students must know, understand and be able to demonstrate after completing a degree in a specific field. Tuning USA is based on the European Tuning work to increase the transparency around what a degree represents under the Bologna Process. The initiative is linked to the goal of “increasing the share of Americans with high-quality postsecondary degrees and credentials from 39 percent to 60 percent by 2025. Because the nation’s overall degree-attainment rate has not risen in 40 years, Lumina and higher education leaders are focusing on new models that build on existing learning outcomes efforts in the United States and abroad”(Lumina Foundation, 2010).

Tuning USA is focusing on defining expectations of graduate learning outcomes, in terms of subject-area knowledge and generic skills, in six disciplines: biology, chemistry, education, graphic design, history, and physics. With a focus on the employability of graduates, the exercise is being conducted as an educational experiment in Utah, Indiana and Minnesota (see Box 27).

Box 27. Tuning USA

“A general theme of the effort is that degrees will have more meaning if there is a consensus about what they mean, and if that consensus is based on learning objectives and skills, not credits earned or courses completed.

Clifford Adelman, one of the leading American experts on the Bologna Process and the enrollment patterns of American students, is working with Lumina and the state teams on the tuning project. In a statement, Adelman said it was important to shift the way American colleges define degrees.

“When US colleges and universities describe what students must do to earn a degree in a specific field, they list courses, credit requirements and a minimum grade-point average,” Adelman said. “They do not typically state what students with the degree should know and be able to do in ways that employers, policy makers and the public can immediately understand. We need to embrace a more comprehensive approach to defining the learning that degrees represent or risk falling further behind our global counterparts.”

A document from Lumina outlining the advantages of tuning states that the “process makes the value of any degree more clearly visible and more directly comparable by and among students, academics and employers. It also highlights—in real-world terms—the institution’s contribution to the value of that degree. It serves as a starting point for shared definitions of quality and excellence. And it does this without limiting the flexibility and diversity of the individual institutions.”

State study groups—which will include faculty members and students—will focus on the disciplines selected by the states to determine appropriate learning outcomes and competencies. The goal is to relate these goals directly to the employability of graduates.

In making the announcement, Lumina stressed the desirability of having common expectations for programs, but also emphasized that individual colleges would still control their own offerings.

“While the phrasing of these outcome statements can vary among institutions, all must observe the agreed-upon reference points and templates. For each learning outcome, faculty in the discipline can then establish performance criteria, or definitions of what a student must demonstrate to attain that outcome,” the Lumina document states.

“Each school or department in the discipline designs its own curricular program, delivery methods and assessments to help students attain the agreed-upon learning outcomes. The reference points and templates are arrived at in broad consultation through surveys and field testing with faculty members, students, employers, previous graduates, and faculty in other disciplines from the same institution. The product of the Tuning process in each discipline is a public statement of learning outcomes and criteria of attainment.”

The European process of tuning had the challenge of crossing national boundaries. But the references in the Lumina announcement to colleges' ability to construct their own programs reflect what may be a challenge in the United States. While the norm for European higher education is the large state university or the state polytechnic system, American higher education prides itself—to a degree unusual compared to most other countries—in the diversity of institutions.

In an effort to encourage the development of competencies and learning objectives that could apply to different kinds of colleges, the project has recruited state teams that include a range of institutions. So Minnesota's team, for example, includes the flagship University of Minnesota; an elite private liberal arts college, Carleton College; and numerous state colleges and community colleges: Alexandria State College, Bemidji State University, Minnesota State University at Moorhead, North Hennepin Community College, and South Central College."

Jaschik, S. 'Tuning' college degrees. Inside Higher Ed, 8 April 2009.

Additionally, it has been suggested that US education could benefit from adopting other aspects of the Bologna Process, such as a national qualifications framework and a variant of the Diploma Supplement (Adelman, 2009). However, there appears to be little appetite for such a centralised model of government regulation.

3.5 Developments in Australia

3.5.1 Background

In Australia, a formal approach to quality assurance in higher education emerged in 1992, through an initiative of the then Higher Education Council, supported by the Government of the day, which gave rise to three annual rounds of university quality audits and the payment of additional funds for those universities found to be performing at the highest levels. Those quality audits adopted a fitness-for-purpose approach at the whole of institution level, and rewarded relative excellence (relying on broad judgement rather than a systematic basis for comparability) rather than improvement.

Concurrently, the Government was promoting and facilitating trade in education services. Initial problems emerged with the capacity of several providers to deliver the services they had promised. Particular problems arose in respect of the processing of student applications from China. These problems spurred the Australian Government to enact new forms of consumer protection through the Education Services for Overseas Students (Registration Charges) Act 1997 which obliged providers to pay an annual fee to remain registered with a provider number on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). The provisions of that Act tightened provider registration preconditions, and established a tuition assurance scheme for students, in the event that their provider could no longer operate, to continue their studies with another operator or obtain a refund. Public universities were exempted from this requirement.

With growth in the business of international education and the emergence of private providers catering to that market, suspicions were voiced in Senate Estimates hearings about 'diploma mills'. In 1999, an Australian Government review of Greenwich University on Norfolk Island (an external Territory of Australia) developed criteria for contemporary university status which subsequently influenced a set of "National Protocols for Higher Education Approval Processes" adopted by the Australian Federal, State & Territory education ministers in 2000 (Guthrie et al., 2004). That same year, the ministers also agreed to establish the Australian Universities Quality Agency (AUQA) to audit and report on all providers eligible to receive government funding, and the accrediting bodies for all higher education providers. In its first round of audits, AUQA adopted a fitness-for-purpose approach.

In 2002, the Australian Government initiated a review of Higher Education, launching a discussion paper, *Higher Education at the Crossroads* which, inter alia, raised questions about the standards of Australian qualifications:

"Over the years there have been allegations that university standards are falling. Some critics contend that some universities now offer courses lacking intellectual rigour and that there has been a 'dumbing down' of universities. There are also concerns about a deterioration in the calibre of students entering university but the available evidence does not support this. There have been claims that 'softmarking' has become common practice, and the quality of education has generally been compromised" (Nelson, 2002).

In a subsequent discussion paper focusing on teaching and learning, *Striving for Quality*, a gap was identified in the national system for assuring higher education quality, viz. a lack of definition of acceptable standards for Australian qualifications:

"There is currently no public statement of what standards of achievement or performance are accepted by the higher education community to be at the threshold or minimum for particular qualifications. At present such standards are the realm of individual institutions, and no attempt has yet been made to articulate them at a systemic or national level."

If articulated academic standards are to be maintained, academics need to share a common understanding of the standards, and fairly and consistently assess student achievement in terms of the standards. To ensure such a common understanding, some form of moderation of assessment and evaluation is necessary... There is not a strong tradition of systematic moderation of assessment and evaluation of performance within Australian universities at undergraduate or post graduate coursework level either between different markers in the same subject, across subjects, across course or across institutions” (DEST, 2002).

The Australian Government’s response to the *Crossroads* review in 2003 focused on arrangements for financing reform rather than quality. Subsequently, there was a surge in the registration of private providers of higher education services and a dramatic increase in the quantity of international fee-paying students in Australia, driven significantly by immigration policy incentives. Meanwhile, the Australian Government focused on matters of university governance and workplace reform.

With a change of government in 2007, the sustainability of the Australian model of higher education financing and quality was addressed as a matter of concern. The Australian Government established a panel to review the condition of higher education and recommend future policy directions. A number of the submissions made to the 2002 *Crossroads* review were revisited by the 2007 panel, notably suggestions for a process for academic development of national standards networks (James et al., 2002).

The 2008 report of the Review of Australian Higher Education proposed a rigorous system of accreditation and quality assurance, in order to:

- ensure that students receive the best possible education.
- provide reliable comparative information to underpin student choice of courses and institutions.
- ensure that employers can have confidence in the quality of education provided to their current or potential employees.
- enhance Australia’s position in international education.
- assure the Australian community that it is getting value for its contribution.
- ensure that standards are maintained in a demand-driven funding system in which higher education providers have the flexibility to set their own entry criteria for students (Bradley et al., 2008).

A narrower set of purposes was articulated by the Australian Government in its response to the Bradley report. The Government focused on the need to:

- underpin our vision for Australia to be one of the most highly educated and skilled nations in the world.
- in a period of expansion, when higher education institutions are attracting students who have not traditionally considered going to university and student pathways are linked to funding, institutions will be required to demonstrate that their graduates have the capabilities that are required for successful engagement in today’s complex world.
- ensure that domestic and international students have better information about how our higher education institutions are performing.

...there was a surge in the registration of private providers of higher education services and a dramatic increase in the quantity of international fee-paying students in Australia, driven significantly by immigration policy incentives.

- that taxpayers can see whether value for money is being delivered and the national interest is being well served (Australian Government, 2009).

Whereas the Bradley panel envisioned a more student-driven system amid diverse service providers and saw the need for consumer protection through tighter standards maintenance and wider information to guide student choice, the Government emphasised accountability for performance, labour market relevance and value for money.

The Review of Australian Higher Education argued that because “the standards required in universities underpin quality across the rest of the higher education system, it is imperative that the Australian community has confidence in the standards of its universities and that there is a transparent, national system in place to assure the same [sic] standards are required of all providers of higher education” (Bradley et al., 2008).

The ambiguity of the argument raises concerns. Is it intended that all providers should deliver, at a minimum, to (typical?) ‘university standards’; or that all providers, including all universities, should deliver at the same standard?

The policy language is obtuse. In outlining the role envisaged for a Tertiary Education Quality and Standards Agency (TEQSA), the Bradley report appears to suggest that institution-specific standards would function within a national standards-based framework, but it is unclear how an “institution’s academic standards” would fit in the adoption of “outcomes and standards-based arrangements”, whatever such arrangements are meant to be:

[TEQSA would] “carry out quality audits of all providers focused on the institution’s academic standards and the processes for setting, monitoring and maintaining them. This would include auditing the adoption of outcomes and standards-based arrangements for assuring the quality of higher education” (Bradley et al., 2008).

There was some further ambiguity in the ambition to adopt tighter standards, and a “standards-based approach” as distinct from a “fitness-for-purpose approach” to quality assurance. The matter was complicated by AUQA issuing in 2009 a discussion paper on setting and monitoring academic standards, with a narrow emphasis on general cognitive achievement, and a standardised approach to measurement and reporting (Woodhouse & Stella, 2009).

The confusion has been augmented by the closed processes for designing the new arrangements for national accreditation and quality assurance for vocational and higher education, and the function and governance of TEQSA:

“Unfortunately, Gillard has chosen to develop these detailed proposals in private. She has not published a proposals paper, the public has not been invited to submit comments and participants’ detailed criticisms and alternative proposals have not been published. So a member of the public can’t judge the merits of the competing claims” (Moodie, 2010).

The then Education Minister indicated subsequently that the Government’s interest was in “minimum quality benchmarks”, but defined aspirationally and with regard to the educational experience, with no reference to standards, but with a vague notion of common expectations of all institutions (see Box 28). The confusion was not removed in a further indication that TEQSA would adopt a risk-based approach to the regulation of quality:

By that stage, sections of the university sector had run out of patience with the constant content-free spin, given no apparent link between the ‘trust-us, we mean well’ rhetoric and the reality of behind-the-scenes development of prescriptive policy measures.

“Our new student-centred system will give institutions more autonomy but will be underpinned by the Tertiary Education Quality Standards Agency to ensure quality. TEQSA’s approach to regulation is based on risk, leaving high-quality providers to flourish without unnecessary regulation.”¹⁴

By that stage, sections of the university sector had run out of patience with the constant content-free spin, given no apparent link between the ‘trust-us, we mean well’ rhetoric and the reality of behind-the-scenes development of prescriptive policy measures.

*So what is the policy intent? Is it envisaged that TEQSA will focus on minimum acceptable threshold standards, common to all institutions, with diversity envisaged beyond the threshold? Or is there some other model in someone’s mind, perhaps along the lines of the Teaching and Learning Academic Standards Framework of the University of South Australia (see **Attachment C**)? More basically, why has the Government posed the question at Box 28? Why does the Government presume it has to answer it? Why does it ask ‘what should every student expect’ when it is obvious that student expectations vary, and if they did not then there would be a problem? And how can it reconcile raising such a question with the assertion that ‘this does not mean a move to standardization’, when in practice it must? It is understandable that legislators and taxpayers should know that students are actually learning in higher education institutions, but the appropriate question to ask is ‘how does a higher education institution know that the standards and objectives it has set for itself are being met’?*

If the latter question were to be asked then the Government would not take upon itself the assessment function of universities, but rather establish frameworks for institutional assessment to be externally validated in ways that underpin community confidence. Thus TEQSA would function at the level of meta-regulation, verifying the effectiveness of institutional self-regulation of competent institutions in a diverse and dynamic environment, rather than at the level of micro-regulation where all institutions have to comply with central edicts and checklists for “standards-based arrangements” and commonly mandated expectations of outcomes.

Box 28. Australian Government interest in minimum quality benchmarks for higher education

“The question we have to answer as a Government is: what should every university student expect from their studies? This does not mean a move to standardization—we want universities and other higher education providers to continue to diversify and provide potential students with a variety of options for further study.

The answer does lie in establishing minimum quality benchmarks that students and Government should be able to expect of all institutions. This means, at minimum, an experience that is defined by high quality teaching, which challenges students to intellectually engage and develop the skills, and analytic tools, needed for future work and civic participation.

TEQSA will be built around principles that ensure transparency. We want students to make their decisions about where they want to study on the basis of robust information about the quality of education provided at each institution rather than on hearsay, inference from entry requirements or prestige.

In the future Australian universities will be required to publish more information on their courses, campus facilities, support services and, most importantly, the quality of teaching and learning outcomes.”

Deputy Prime Minister and Education Minister, Julia Gillard: Address to the Universities Australia Annual Higher Education Conference, 3 March 2010.

¹⁴ The Hon Julia Gillard, MP, Deputy Prime minister and Minister for Education, quoted in *The Australian*, 4 April, 2010.

3.5.2 Vocational Education and Training Reform

Developments in respect of Higher Education need to be seen alongside concurrent developments in the Schools and Vocational Education and Training (VET) sectors. The Australian and State & Territory governments have signed on to policy goals, attainment targets, and regulatory frameworks that overlap the three sectors. There are also other policy implications flowing from these aspirations, including system steering, financing and structural capacity, although these have not been much discussed.

3.5.2.1 Recent developments

The Council of Australian Governments (COAG) agreed to set the following targets:

- to halve the proportion of Australians aged 20 to 64 years without a certificate level III qualification by 2020;
- to double the number of higher qualification completions (diplomas and advanced diplomas) by 2020;
- to raise the proportion of young people achieving Year 12 or equivalent qualification to 90 per cent by 2015; and
- to halve the gap for indigenous students in Year 12 or equivalent attainment by 2020.

With regard to Higher Education, in 2009 the Australian Government adopted a modification of the targets recommended by the Bradley Review:

- to increase the proportion of 25- to 24- year olds having attained a qualification at bachelor level or above to at least 40% by 2025;
- to have 20% of undergraduate enrolments being people from low socio-economic backgrounds by 2020.

In the light of these goals and other factors, the Bradley panel sensibly saw the need to coordinate policy across the whole of tertiary education and training, improve and share information and research, and “take a long-term and holistic view of the performance of tertiary education and training” (Bradley et al., 2008). However, its own terms of reference required a focus on higher education, such that its consideration of VET was confined mostly to the area of overlapping qualifications at the diploma and advanced levels, and could not be comprehended within a broader view of the changing role of VET.

Subsequently, at its meeting in December 2009, COAG decided to establish a separate national VET regulator and a National Standards Council, and to strengthen licensing arrangements for VET providers serving international students:

“Raising productivity is a key focus of COAG’s agenda, and education and training is critical to increasing the productivity of individual workers and the economy as a whole. Effective regulation of the VET sector acts as a key quality assurance mechanism for the skills base of Australia’s workforce and facilitates labour mobility. COAG today agreed to establish a national regulator for the VET sector. The regulator will be responsible for the registration and audit of registered training providers, and accreditation of courses, and will be established under Commonwealth legislation. A national standards council will also be established to provide advice to the Ministerial Council for Tertiary Education and Employment on national standards for regulation, including registration, quality assurance, performance monitoring, reporting, risk, audit, review and renewal of providers, and accreditation of VET qualifications. COAG also agreed to amend the Australian Quality Training Framework (AQTF) urgently to strengthen the regulatory requirements underpinning the VET sector where weaknesses have become apparent in the international education sector. These amendments

introduce conditions and standards for initial registration of new providers and strengthen the requirements for ongoing registration, including stronger financial viability and fee protection conditions. The revised AQTF will be in place for the re-registration of all international education providers in 2010, and will give greater consumer protection assurance to international students studying in Australia” COAG Communiqué, 7 December 2009.

3.5.2.2 Post-Fordism and the quest for ‘adaptable skills’ and continuous learning

Enlargement and diversification of consumer demand, along with new technological products and processes, particularly from the mid 1960s, gave rise to a shift from the Ford company model of mass production of standardised goods to the niche supply of varied and customised products and services (Scott, 1988). That model of mass production relied on a narrow specialisation of tasks and a strict division of labour, organised along Taylorist principles (Boreham, 2002). In this post-Fordist context, new models of work organisation emerged, involving flatter hierarchies, multi-tasking of multi-skilled teams, and competitive advantage based on flexibility, adaptation and innovation (Boreham, 2002). The need arose for more knowledge-based workers through the flow of new recruits and further skilling of existing workers through continuous learning throughout their working lives (Carter, 1997).

In the mid 1980s, both in Australia and Britain, a competency-based approach to vocational training was brokered between trade union leaders, employer organisations and government. In Australia, as part of an Accord with the trade union movement and the Hawke Labor Government to increase ‘the social wage’ in exchange for money wage restraint, a ‘structural efficiency’ principle of skills-based industrial awards was agreed, viz. that award wage increases should be based on demonstrated improvements in productivity. That agreement gave rise to a ‘national training reform agenda’ for improving Australia’s productivity and international competitiveness, which included the establishment of a more coherent and better articulated national system of vocational education and training (Keating, 2003).

Competency-based training (CBT) in Australia, which had its origins in Victorian and South Australian training improvement initiatives (Guthrie, 2009), was taken up as a major national agenda following the 1987 Australian tripartite mission (ACTU/TDC, 1987) and the Australian Government’s publication of *Industry Training in Australia: The need for change* (Dawkins, 1989a) and *Improving Australia’s Training System* (Dawkins, 1989b). By focusing on what a person can do on the job, CBT was seen to break from previous practices in several respects: moving away from a time-serving approach to a skills demonstration approach; focusing on the results of training rather than inputs to training; training to industry-specific standards rather than an individual’s performance relative to others in a training group (ACCI, 1992); and shifting from a supply-side (provider/educator) approach to an industry-led approach (Misko & Robinson, 2000, cited in Guthrie, 2009).

CBT, within a competence-based approach to qualifications, was seen to provide ‘ladders of opportunity’ for credit accumulation and recognition of informal learning. When skills formation was linked with wage remuneration it was seen as a means of encouraging more employees and job seekers to obtain qualifications as a source of improving productivity—a win-win for employees and employers:

When skills formation was linked with wage remuneration it was seen as a means of encouraging more employees and job seekers to obtain qualifications as a source of improving productivity...

“The testing of a candidate’s knowledge, understanding and performance of workplace competence through practical observation and provision of evidence of prior learning is another particular feature

of the United Kingdom and Australian systems. This allows existing workers and other individuals to acquire national vocational qualifications without having to attend a specific training course. The value of these pathways will depend on the extent to which they are respected by employers through higher levels of pay, regard and employment” (Misko, 2006).

In Australia, the introduction of CBT was seen as enabling a range of micro-economic reform benefits: increased participation in education and training; wider access to education and training for people from disadvantaged backgrounds; the recognition and certification of the skills of existing workers; greater access to on and off the job training for workers; a breaking down of occupational segregation based on gender divisions or outdated craft divisions; increased private and public investment in training; and improved quality and flexibility of the national training system (Goozee, 2001).

A major feature of the national training arrangements agreed in the early 1990s between the federal, state and territory governments and industry were ‘training packages’. They provide national competency-based qualifications by packaging ‘units of competency’ into meaningful groups in accordance with AQF specifications. Australia’s approach to CBT was adopted from the British ‘functional competency’ model, which was workplace-focused and performance-oriented, with little attention to underpinning knowledge, and with less consideration to holistic skills and personal attributes than in the US and German approaches (Brockmann et al., 2008; Guthrie, 2009). The creation of the AQF in 1995 was triggered and shaped by the formation of these national training arrangements, and the schooling and higher education sectors were bookended onto the framework for VET.

The creation of the AQF in 1995 was triggered and shaped by the formation of these national training arrangements, and the schooling and higher education sectors were bookended onto the framework for VET.

A high-level review of training packages in 2004 recommended, inter alia, that they needed to be reconceptualised, with generic skills “at the front and centre of redevelopment”, noting that “competency is a broader concept than the ability to perform workplace tasks”. The review also recommended that the AQF should be reviewed, including the flexibility of its descriptors in “valuing ‘skill sets’: discrete but cohesive components of learning” (but less than complete qualifications), and to take account of national and international developments in matters relating to qualifications frameworks (Schofield & McDonald, 2004); see Box 29).

Box 29. Selected findings & recommendations of the 2004 high-level review of training packages

“The challenge of aligning skill outcomes to the changing world of work, new industry and labour market dynamics, and different social circumstances is now even greater than when Australia first embarked on the path of national training reform.

New skills will be needed, underpinned by new knowledge and learning, and promoted by new pedagogies. Employees will be subject to changing employment patterns and organisational changes. And this will need to be supported by new ways in which training providers engage with their clients.

Our research and consultations re-affirm the labour market and educational value of industry-developed statements describing performance expected in the workplace, and of industry-developed, nationally recognised portable qualifications linked to the Australian Qualifications Framework. They also re-affirm the value of bringing them together. As a result, we are convinced that the Training Package model has the potential, with improvements, to facilitate good labour market and educational outcomes for enterprises, industries, individuals and communities. However, changes will be needed to the ways in which Training

Packages are conceptualised, developed and implemented, or the model will struggle to achieve its purposes, and will ultimately fail.

By this we mean ensuring confidence and trust in the capacity of this model to serve diverse clients and to be relevant in a changing labour market, and we mean rebuilding expectations about what it can, and cannot, deliver. This will involve doing more than re-affirming the existing assumptions about competence—we will have to think our way to conceptual and therefore policy clarity. In particular, there is a need to continue to emphasise that competency is a broader concept than the ability to perform workplace tasks. We also see a need for national leadership to involve all stakeholders in considering how processes could be streamlined to avoid unnecessary disputation between endorsing parties.

We believe that the language associated with Training Packages should shift from discussion about ‘rules’ to discussion around ‘design’, and more emphasis should be placed on improving the design of Training Packages than adjusting the rules. The issue of generic skills needs to be ‘front and centre’ in the redevelopment of Training Packages.

If Training Packages are to continue to serve the needs of both industry and learners, the status of full qualifications must not be eroded. At the same time, employers and individuals are increasingly valuing ‘skill sets’: discrete but cohesive components of learning, and we recommend steps to give them greater recognition. Submissions and consultations also suggested that a review of the adequacy of the AQF and the flexibility of its descriptors is also needed, taking account of national and international efforts to achieve a coherent qualifications framework which works for all sectors.

Schofield & McDonald, 2004.

The issue of generic skills needs to be ‘front and centre’ in the redevelopment of Training Packages.

The high level review may be seen as an attempt to bridge the gap between the interests of the industry skills councils and the importance they attach to workplace learning, on the one hand, and the interests of individual learners and institutional providers, on the other hand.

In 2008, Australia participated in a series of OECD country reviews of vocational education and training. The ensuing report found that:

“Australia has a very well developed VET system, which enjoys a high degree of confidence. In particular: the engagement of employers is strong; the national qualification system is well established and understood, and is clear and consistent across the states and territories; the VET system is flexible and allows for a fair amount of local autonomy and innovation to adapt learning to local circumstances” (Hoeckel et al., 2008).

However, the Review noted a number of deficiencies in funding arrangements, inefficiencies in the development and implementation of training packages, and gaps in information about outcomes from training. It recommended, inter alia, that “training packages should be replaced by simple and much briefer statements of skills standards”, and “consistency in standards throughout Australia should be achieved through a common assessment procedure to determine whether the necessary skills have been acquired” (Hoeckel et al., 2008). It urged Australia to consider introducing “a common national assessment” either along the lines of the national exit examinations in Japan and Korea, or the Dutch model of a quasi-independent agency of the central government that is responsible for examinations in all VET schools, or Germany’s combination of local and national assessment methods:

“[The German approach] makes it possible to take account of local variations of VET programmes while securing minimum standards and comparability of certificates by combining three final certificates obtained from the employer, the VET school, and through external national examinations. The employer certificate is a work reference based on what the individual did in the work situation

measured against the relevant occupational and training standards. The school certificate represents continuous assessment of the student by the local educational institution; each state has its own requirements for this certificate. The external national examination, which counts most of the three, is a uniform test developed by the employer associations of each sector, administered to all applicants and aims to assess minimum competencies” (Hoeckel et al., 2008).

There appears not to have been a formal government response to the OECD Review recommendations about training packages and external exams. The national VET regulator, and national standards council, established by COAG, will presumably advise on such matters in due course.

Meanwhile the Australian Government, in its May 2010 Budget, announced a number of initiatives, including:

- “smarter apprenticeships...to support a fundamental shift from a time-served apprenticeship model to a competency-based system”;
- A national entitlement to a quality training place, expanding VET FEE-HELP (access to income-contingent loans from the Government with repayment liability triggered by a set amount of graduate income) for around half a million VET participants at diploma, advanced diploma, graduate certificate and graduate diploma levels;
- A Quality Skills Incentive to “lift the standard and performance of vocational education” in the larger training organisations; and
- A *MySkills* website providing “information about vocational institutes and colleges including student pathways, satisfaction and competencies; employer satisfaction and engagement; levels of commencements and completions; community and social engagement; and the type of training available (Gillard & Albanese, 2010).

There appears not to have been a formal government response to the OECD Review recommendations about training packages and external exams.

However, a number of underlying policy issues need to be attended to. 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?*

To indicate the policy interactions with the questions being addressed for higher education, a number of these questions are explored briefly below.

3.5.2.3 New questions on the VET policy agenda

i. What is the role of vocational education and training?

Should the function of VET be defined in terms of (a) the nature of its providers, or (b) its participating learner groups, or (c) the sources of its learner groups, or (d) the occupational destinations of its graduates, or (e) its responsiveness to employer requirements on an industry sector basis, or (f) the nature of its approach to learning, or (g) the character of its qualifications, or (h) by some combination of the foregoing?

Can VET be simply defined by the nature of its providers? That is, VET is what TAFE institutions and private VET providers offer. The problem with that approach, apart from its hollowness, is that some VET providers offer secondary schooling and higher education, and higher education providers offer VET programs. It does not necessarily follow that the overlap in offerings constitutes sectoral blurring (a university that offers secondary education does not become a school and cease to be a university) but it does focus the definition of difference on other than provider-type factors.

Can VET be simply defined by the nature of its providers?

A longstanding approach has been to define VET in terms of the learner groups for which it especially caters. One approach focuses on those with practical (as distinct from academic) aptitudes, in several countries, through streaming in secondary schooling, with the functional purpose of specialising in the development of trade, craft, technical and other skills. Australian VET differs from arrangements in most other countries, in that “much initial training of young people (primarily ISCED levels 3 and 4) occurs once they have left school and entered the workforce” (Field et al., 2009).

Another approach focuses on VET as “the right vehicle for upskilling those who would otherwise be unskilled and ensuring a smooth transition into the labour market” (Field et al., 2009). In Australia, a major focus has been on second-chance provision for those who have not succeeded in formal schooling, whether because of its alienating environment or overly-academic orientation.

Perhaps these functional and equity purposes sit together uneasily, blurring the objectives for VET, signalling its low status and reducing its attractiveness to those who want to excel technically.

A third approach relates to a more comprehensive lifelong learning agenda, where VET can be a basis for labour market entry, on-the-job skills formation, practical skills development following or concurrent with study for a higher education qualification, training for change of employment, and broader education for citizenship and development of capacities to pursue personal interests.

If VET can serve diverse clients types, several of which are served by other provider types, is the defining character of VET related to its focus on skills formation? Is the role of VET primarily related to technical skills, or low-end abilities, or capacity for lifelong learning? Is VET more appropriate than higher education to some occupations? Is VET distinctive as a mode of learning, particularly through its emphasis on workplace learning and its assessment of units of competence? Or does VET, like higher education, involve a variety of learning modes? Or is VET defined by the nature of its special relations with employers as clients?

ii. To what extent should VET be industry-led or student-driven?

Hart (2010) has argued that employers have lost out in the struggle over VET: “the three tenets of the training system—training packages, user choice, and the AQF—have been undermined to the point of no return” (Hart, 2010). As Hart sees developments, a first blow was struck when the ‘user choice’ agreement introduced in 1997, which had encouraged a direct market relationship between VET providers and employers as purchasers of training delivery for apprentices and trainees, was wound

back in 2000. Another blow was struck when training packages “morphed into a sort of national curriculum” (Hart, 2010). Yet another blow came in the decision of the AQFC to redesign the AQF as a framework of qualifications based on a taxonomy of learning outcomes and explicit reference levels with a measurement of the volume of learning. The final nail in the coffin of an industry-driven system, is funding on the basis of student demand:

“In the absence of employer influence, the system will move to a ‘voucher’ scheme, where trainees receive a blank cheque. The allocation of funds will flow to where trainees want to go. Wooed by the next ‘cool thing’ or the lure of a free ipad, trainees will enrol in courses of their (and their parents’) choice, whether or not jobs will follow” (Hart, 2020).

However, except for the trades and technicians groups, the occupational destinations of VET graduates do not necessarily align with their fields of learning (Karmel et al., 2008). Hence, a narrowly structured approach to VET is inappropriate for those who will need broader capacity to adapt to different job requirements. Additionally, it is suggested that VET providers should offer qualifications not merely of ‘exchange value’ but also of ‘intrinsic value’ (Keating, 2008) to “meet the personal needs and aspirations of learners and the diverse business needs of enterprises” (Noonan, 2010).

In considering these two perspectives on an international scale, the OECD reviews of VET have suggested the need for overall provision “to balance student preference and employer demand”, but they point to a prior question of ‘who pays’:

“If students pay the full costs of provision they may reasonably expect their preferences to play a dominant role. Conversely where employers fund all the training, they will naturally expect to decide what is taught. Between these two extremes, there are many models of mixed support for training from government, students and employers. Efficiency requires these models to reflect the mix of benefit obtained from the training” (Field et al., 2009).

iii. What role should competency-based training play?

■ Is ‘training’ an intrinsic part of vocational education, an adjunct to it, or separate from it?

The Australian VET sector serves three quite different clientele: those preparing for workforce entry, whose skills formation is primarily institutionally-based; those in the workforce, whose skills formation is primarily workplace-based; and those who seek to develop skills unrelated to their employment. The middle group has more episodic, if any formal relations with VET institutions, and for them the primary purpose of a VET relationship is recognition of their skills formed on the job.

The skills-based industrial awards model of the early 1990s, as outlined earlier, prioritised persons in work, rather than workforce entrants. The competency-based training (CBT) model, carried into training packages, was derived from analysis of employer-specified on-the-job task requirements. Yet the CBT approach is embedded in the philosophy of all VET qualifications, and thereby all its clients, including those obtaining credentials for workforce entry, and those seeking to re-train for change of employment or for personal purposes, whose participation is unrelated to the needs of their current employer. For those whose purpose is workforce entry or job change, the CBT approach of VET may be limiting. Perhaps CBT has most value as an assessment tool for workplace learning?

...OECD reviews of VET have suggested the need for overall provision “to balance student preference and employer demand”, but they point to a prior question of ‘who pays’...

Perhaps CBT has most value as an assessment tool for workplace learning?

iv. How should competence be understood?

The Australian approach to competence follows the English functional skills approach (Guthrie, 2009). In contrast Germany and some other European countries have adopted a knowledge-based approach (Brockmann et al. 2008). Rauner (cited in Brockmann et al., 2008) has distinguished between 'education for an occupation' and 'education for employability'. In education for an occupation, the German approach to capability development integrates theoretical knowledge in institutional settings and workplace learning. In contrast, the English approach involves "a market of qualifications enabling individuals to enhance their employability through certification of competencies acquired either through work experience or courses in a modularised system" (Brockmann et al., 2008).

Just as the English approach is seen to be too narrowly skills-based, so the German approach is coming to be seen as too tightly linked to specific occupations for contemporary labour markets. Employability is now being seen as a multi-dimensional set of competencies—including cognitive, affective, interactive capabilities and values—and not solely focused on the interests of particular employers (Brockmann et al., 2008).

v. Can or should VET be defined as a distinct sector?

What is 'vocational education', as distinct from 'general education', in a context where, in one view, "occupations (are) becoming less, rather than more delineated and less, rather than more, specialised" (Brockmann et al., 2008)? How different is vocational education in the VET sector from vocational education in the higher education sector?

On the one hand, the Bradley Report considered that "It is no longer helpful to see stark contrasts between higher education and VET in the level and types of qualifications they deliver":

"Traditionally higher education has concentrated on delivering longer study programs with a strong element of general education and adaptable skills largely for professional occupations, whereas VET has focused on more immediate vocational outcomes in trades and paraprofessional occupations. However these differences are shifting. The vocational and professional focus of higher education has grown in recent years and VET has responded to the demands of industry for higher level skills by re-focusing on middle-level and advanced training" (Bradley et al., 2008).

On the other hand, the panel noted that submissions to the review from universities and public VET providers "generally supported continued differentiation in the roles of VET and higher education, but recognised that convergence is occurring". State governments too supported "retaining distinct VET and higher education sectors". Employers argued for "an integrated post-secondary skills environment where the differences between the sectors do not restrict the capacity of individuals to move between them". The panel concluded that "although distinct sectors are important, it is also vital that there should be better connections across tertiary education and training to meet economic and social needs which are dynamic and not readily defined by sectoral boundaries". Bradley, et al., 2008, page 180). But the panel did not say why distinct sectors are important (if it was in agreement that they are). Indeed, the panel went on argue for a major realignment of governmental responsibilities for VET:

"Major employers and providers of education and training operate across state and territory boundaries. No longer are education and skills 'state-specific' or 'state-centred'. In an integrated national economy, education and skills are required to be nationally consistent and certified. It appears too, that some states and territories face major fiscal constraints, which may lead them to reduce their investment in the near future, leading to skewed and uneven investment over time if a demand-based model is adopted for higher education. For these reasons, the panel considers that it is now time for the Australian government to take primary responsibility for the broad tertiary education and training system in Australia. What is needed is not two sectors configured as at present, but a continuum of tertiary skills provision primarily funded by a single level of government and nationally regulated,

which delivers skills development in ways that are efficient, fit for purpose and meet the needs of individuals and the economy” (Bradley et al., 2008, page 183).

vi. Is VET moving in a bifurcated direction?

VET can be seen to focus on “mid-level trade, technical and professional skills alongside those high-level skills associated with university education” (Field et al., 2009). However, dual labour market or ‘hollowing-out’ developments are pushing more occupations up the skills hierarchy, leaving VET to cater proportionately more for the lower end, as “the most skilled jobs are falling outside the aspirations of younger diploma holders (who) will have to settle for a less skilled job...as the basic entry-level qualification for the more skilled occupations is going to be a degree” (Karmel, 2010). The contested market for VET and higher education providers is at the diploma level, which represented some 23% of TAFE activity in 2009 (Karmel, 2010).

The contested market for VET and higher education providers is at the diploma level...

In this context, what will define VET in the future? Should it cater for the lower skills end? Or can it offer something different by virtue of its approach to learning and assessment? Are the teaching, learning and assessment styles of workplace learning similar to those needed for institutional delivery (Shreeve, 2010)?

Many of these and other matters are unsettled in policy terms, yet decisions about underpinning frameworks, such as the adoption of a unified AQF, are being made in anticipation of an integrated model of tertiary education steering, alongside decisions to maintain sectoral separation, such as the adoption of different regulators for higher education and VET. Some of the big questions remain on the table: 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; and how should VET quality be assured?

Interestingly, the same problem that worried the UK House of Commons and the Spellings Commission in respect of higher education is being raised in Australia about VET, which is built on a standards-based foundation:

“Quality is the biggest immediate issue for VET. Currently there is little public available data to prove that individual providers—public, private or enterprise-based—achieve quality outcomes for their clients and employees. Until assessments are regularly externally moderated and validated across providers, industry and individuals cannot have real confidence that a certificate III issued by one registered training organisation is to the same standard as a certificate III issued by another” (Shreeve, 2010).

So should responses to this challenge in VET be handled separately from that for higher education, or as part of a broad tertiary approach?

3.5.3 The new Quality and Regulatory Arrangements for Australian Higher Education

On the landscape page below is a depiction by the Department of Education, Employment and Workplace Relations (DEEWR) of its understanding of the Australian Government’s proposed new regulatory and quality arrangements for Higher Education. The proposed new arrangements are presented as comprising four elements:

- i. the Tertiary Education Quality and Standards Agency (TEQSA);
- ii. a new National Register of Higher Education Providers;

- iii. a new Higher Education Standards Framework; and
- iv. the My University website.

No explanation has been given for this categorisation which seems to have been derived from various administrative heads of power and political expediency. For instance, it seems that the new National Register is to be an updated version of the CRICOS register. No information is yet available in the public domain about the role and content of the new register, other than the indications given in the four-column schema above, which include but are not limited to accreditation status and provider type.

Several important matters are not yet clear, at least not to the Higher Education community, even if they have been resolved within the forums of the Australian Government. It is also not yet evident that the various elements, especially the role of TEQSA, have been agreed by State and Territory education ministers. Indeed, some matters of the referral of State powers to the Federal Government remain in dispute, and it is not clear how far the Federal Government will seek to act through its Constitutional powers (such as the Corporations power which the High Court has interpreted widely) to override resistance by State & Territory governments to its preferred actions. Additionally, there are many particular details yet to be finalised relating to the implementation of the proposed arrangements.

What is especially unclear is how the four elements will interact, and how aspects of the regulatory and quality arrangements will affect an institution's course offerings and government funding. It appears to have been decided that TEQSA will "oversee" the "new Higher Education Standards Framework" (Nicoll, 2010). Worryingly, on indications to date, as outlined below, Australia appears to be taking a heavy-handed top-down approach of centrally-mandated prescriptions to higher education standards and quality which contrasts markedly with the more consultative, bottom-up and flexible approaches in Britain, Europe and the US. As discussed below in respect of national qualifications frameworks, the available evidence from international experience suggests that gradual, mutually-developed processes of change yield better and more durable policy results.

Australia appears to be taking a heavy-handed top-down approach of centrally-mandated prescriptions to higher education standards and quality which contrasts markedly with the more consultative, bottom-up and flexible approaches in Britain, Europe and the US.

The four elements of the new quality and regulatory arrangements for Australian Higher Education

Students' education			
Higher Education Providers			
Tertiary Education Quality and Standards Agency	National Register	Higher Education Standards Framework	MyUni website
<p>Governance</p> <p>TEQSA will be established as an independent body with powers to register university and non-university higher education providers, monitor quality and ensure standards. TEQSA will be a Commonwealth statutory authority established under the Financial Management and Accountability Act 1997.</p> <p>Functions of TEQSA</p> <ul style="list-style-type: none"> • Ensure quality of Australian higher education system • Register and deregister university and non-university higher education providers • Accredite and reaccredit programs of study for those higher education providers that do not have authority to accredit their own programs • Undertake evaluations of the quality providers • Collect and analyse data • Exercise best practise regulation • Provide independent advice on standards, quality and regulation • Provide information about the quality of higher education • Provide information about courses, campuses, facilities, support services • Recognition international accreditation bodies <p>Functions of Standards Panel</p> <ul style="list-style-type: none"> • Overall balance of the Standards Framework ensuring consistency and coherence among 5 domains • Advise on Provider Registration Standards and Provider Category Standards • Monitor the effectiveness of the Standards Framework • Consult with stakeholders to ensure the Standards are meeting the needs of students, employers and others 	<p>All higher education providers operating in Australia will be required to be registered on the National Register of Higher Education Providers</p> <p>The Register will include but not be limited to details of:</p> <ul style="list-style-type: none"> • The provider • The accredited programs they can deliver • Authorisation to accredit programs i.e. makes clear if programs are accredited by the provider or by TEQSA • Date of required progress reports • Date of next re-registration • Category of provider: registered higher education provider, university, university of specialisation, university college, Australian campus of overseas provider 	<p>Provider Registration Standards</p> <ul style="list-style-type: none"> • Legal status and standing • Financial viability and safeguards • Governance • Management • Primacy of academic quality and integrity • Responsibilities to students • Human resources and professional development • Physical resources and infrastructure <p>Provider Category Standards</p> <ul style="list-style-type: none"> • Registered higher education provider • University • University of specialisation • University college • Australian campus of overseas provider <p>Qualification Standards</p> <p>The Australian Qualification Framework</p> <p>Information standards</p> <p>Information that providers should make available to TEQSA for regulatory purposes and to the market to support transparency</p> <p>Teaching and Learning</p> <p>Benchmarks for teaching and learning quality assurance</p> <p>Research standards</p> <p>Benchmarks for research</p>	<p>MyUni website</p> <p>A 'My University' website will be established by no later than January 2012 to assist prospective students to make choices about what and where to study. This will be progressed in partnership with the sector but could include:</p> <ul style="list-style-type: none"> • Student to staff ratios • Results of student satisfaction surveys • Measures of graduate skills • Graduate outcomes • Information about fees • Information about access to student services, and most importantly • Quality of teaching and learning outcomes

3.5.4 The Tertiary Education Quality and Standards Agency (TEQSA)

The proposed roles for TEQSA are unprecedented in scope. Its powers would encompass:

- *accrediting providers*
- *evaluating the performance of institutions and programs*
- *encouraging best practice*
- *establishing objective and comparable benchmarks of quality and performance*
- *monitoring performance in areas such as student selection, retention, exit standards, and graduate employment* (Australian Government, 2009).

In the democratic traditions of countries like Australia, Britain and the US, constitutional arrangements conventionally respect a separation of powers between rule making, and rule interpretation and enforcement. Normally, standards are set by one body and are enforced by another body. Typically, compliance with accountability requirements is separated from incentives for performance improvement. The proposed roles and powers of TEQSA transgress these conventions.

The Bradley report recommended, and the Government accepted, that TEQSA would be formed initially to focus on higher education but it would expand over time to encompass vocational education and training. In July 2010, the Government announced the appointment of Denise Bradley as the interim chair of the body she recommended, TEQSA. An interim chair was also appointed for the separate National Vocational Education and Training Regulator. The chair of the AQF Council, John Dawkins, was appointed in June 2010 also to Chair the VET National Quality Council.

Normally, standards are set by one body and are enforced by another body.

3.5.5 Higher Education Standards Framework

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

Apart from the bullet points in the chart above, no information is officially available on the public record 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 and Territories in registration requirements. However, as noted at 4.3.4 below, an early uncirculated draft of the provider registration standards, involving 89 requirements, envisages considerably enlarged and more prescriptive requirements than the national protocols.

Similarly, it is not clear what the *provider category standards* will require. The chart above suggests the categories will include: registered higher education provider; university; university of specialisation; university college; and Australian campus of an overseas provider. It is not clear whether the categories will be limited to those on the chart. The 2008 Review of Higher Education discussed, but did not recommend, “comprehensive universities”, “specialist universities” and “other higher education institutions”, and referred to “university colleges” being established on a pathway to full university status. The Review did recommend (recommendation 22):

“more rigorous criteria for accrediting universities and other higher education providers around strengthening the link between teaching and research as a defining characteristic of university accreditation and reaccreditation. In particular, universities should be required to:

- deliver higher education qualifications including research higher degrees in at least three broad fields of education initially and a larger number over time;

- undertake sufficient research in at least three broad fields initially and over time in all broad fields in which coursework degrees are offered; and
- undertake sufficient research in all narrow fields in which research higher degrees are offered" (Bradley et al, 2008).

Notwithstanding its recommendations for enlarging student participation, the Review gave no serious consideration to structural differentiation in the Australian tertiary education system. In its brief discussion of structural options, it ignored most of the institutional types found elsewhere in the world, such as community colleges, polytechnics, Doctorate-awarding universities, Master's Colleges and Universities, and Baccalaureate Colleges.¹⁵ The Government's response to recommendation 22 was simply "to be progressed through TEQSA" (Australian Government, 2009), with no indication of agreement with the insistence that institutions with the title "university" must deliver research higher degrees.

The Review's recommendation is itself unclear. What is "sufficient" research? Does the research have to be up to any given standard? Would it be sufficient to have one or two people undertaking research in a broad field? How does the 'teaching/research nexus' work in a broad field like 'natural and physical sciences', where research is being undertaken in geophysics but teaching is provided across the biological sciences? How does it make a difference to the student experience in law when research activity at a university in the broad field of 'society and culture' is in sport and recreation? Would a university be registered to offer PhD programs in the fields where it had no research? How is it expected that the 'research standards' of the Higher Education Standards Framework will interact with the other 'standards' and 'standards-based arrangements'? And how will the Excellence in Research for Australia (ERA) research assessment exercise inform judgements related to the various standards and performance assessments?

With regard to the *information standards*, there seems to some overlap with the *MyUni* website, and possibly some interaction with other performance funding programs of the Education Department. What is implied by having institutional offerings "tested and assessed in a consistent and transparent way"? What are 'offerings' in this context? It is not clear how much additional accountability reporting will be imposed, but the Government's expectations are extensive:

"We have to know where we are succeeding and where we are failing if our investments are to be effective. A key task will also be to establish objective and comparative benchmarks of quality and performance. Richer data will be collected. Performance in areas such as retention, selection and exit standards, and graduate outcomes will be important. A priority will be to continue to encourage our academics to value teaching as much as their passion for research. Having a national approach is vital so that students in different states and regions can be assured that the offerings of our institutions have been tested and assessed in a consistent and transparent way" (Gillard, 2009).

There is no obvious practical implication of the different 'domains' of the 'higher education standards framework' being grouped together. For instance, the determination of provider registration standards could be a function of an inter-ministerial council, as at present for the national protocols which they are to replace. Qualifications statements could continue to be developed by the AQF Council, and research standards could be a function of the research funding councils (the Australian Research Council, and the National Health and Medical Research Council). Information standards could continue to be developed by government departments, as for the *MyUni* website, compacts and performance funding reporting requirements. It is good policy practice, consistent with long-standing democratic conventions, to separate standards setting from their enforcement and monitoring.

¹⁵ <http://classifications.carnegiefoundation.org/descriptions/basic/php>.

3.5.6 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 (see Box 30). 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 (Nicoll, 2010). However, the ALTC project goes well beyond both Tuning and Subject Benchmark Statements, which are 'mapping' references (AUQA, 2009), by specifying standards for internal assessment and external audit purposes:

"The Australian Government is funding the Australian Learning and Teaching Council to undertake the Learning and Teaching Academic Standards Project. The Academic Standards will then form one element of the new Higher Education Standards Framework. They will provide the Tertiary Education Quality and Standards Agency with ways of assuring that the discipline-based learning outcomes of Australian higher education students are assessed. Learning and teaching academic standards will be based on the identification of threshold learning outcomes for each degree course in each discipline offered in Australia. They will be publicly defensible statements and achievement of them will be assessable. The Academic Standards will also represent a valuable instrument for self-review by institutions and disciplines and will evolve over time as disciplines change. They will represent threshold standards for student and graduate achievement" (DEEWR, 2010, Higher Education Newsletter).

Box 30. ALTC Principles underlying use of academic standards for quality assurance

To ensure that the process of setting academic standards is accepted and supported by the academic community some principles were developed to safeguard the process. A preliminary list of principles follows but may be revised as the project develops.

The process must be transparent, evidence-based, outcomes-based, responsive and feasible:

1. Academic standards will be expressed as assessable learning outcomes. Descriptors of input and process (eg, student/staff ratios, student entry scores, class sizes, teaching methods) may support but are not acceptable substitutes for evidence of achievement of core learning outcomes.
2. Threshold academic standards, defined as minimum learning outcomes, will be defined by each discipline community for each level of qualification.
3. There must be a regular cycle of review of academic standards to maintain currency with advances in knowledge and practice.
4. Minimum academic standards must be comparable with international standards.
5. Processes for using standards for institutional or disciplinary performance improvement must be efficient, transparent and based on peer review.
6. Processes for auditing academic standards must be developed so as not to give rise to perverse consequences, e.g. standardisation of curricula or standardised tests.
7. Diversity and academic autonomy across the sector must be protected:
 - Individual institutions may set their own learning outcome standards beyond the defined threshold academic standards in any or all disciplines and may also choose to submit them for audit.
 - Individual institutions are free to determine the curriculum, teaching methods, resources and assessment methods leading to the achievement of the defined core learning outcomes.

ALTC, 2010.

The ALTC's working definition, which may be refined as the project proceeds, is:

*"Academic standards are learning outcomes described in terms of discipline-specific knowledge, discipline-specific skills including generic skills as applied in the discipline and discipline-specific capabilities. The standards to be defined are **threshold** standards, expressed as the **minimum learning outcomes** that a graduate of any given discipline must have achieved"* (ALTC, 2010, emphasis in original).

By end 2010, there is to be a report:

"which outlines a broadly based view on how the process of defining discipline-based learning outcomes, assessing them, and using them for quality improvement can be sustained and carried into the future in a close relationship with TEQSA" (ALTC, 2010).

The ALTC approach may be a useful means of enabling a structured contemporary dialogue within the academy around expectations of learning objectives from disciplinary perspectives. However, it can be a time-consuming exercise for people who are already over-stretched, and even after exhaustive considerations it may not result in consensus and certainly not of the type that could form a firm basis for external regulatory purposes:

"The essence of the proposal is that the collegial academic and discipline relevant debate and specification of academic standards pursued within institutions, and which are explicitly acknowledged to be appropriate, be writ large nationally. In our view this is not practically feasible unless the focus is diluted to very broad fields and very high level notions of outcomes, and if done at such a level, will not be useful to any institution or other stakeholder. Putting aside for the moment our significant concerns about standardisation and the stifling of diversity and innovation that would result from the proposal, it may be feasible for academics within a narrow discipline field to agree on 'national statements of desired learning outcomes' for very specific elements of curriculum. For example, the accounting discipline (where professional accreditation places some constraint on diversity) might agree on desired outcomes for introductory financial statement analysis. Even here, however, history and experience would suggest that many academics would disagree on at least some of the expected outcomes, due mainly to disagreement about what should be the education goals of specific course units. Repeating such debate and consideration across even one discipline field for the full curriculum of any degree would be a massive undertaking. Even if it could be accomplished, it would likely be out of date by the time it was completed" (ATN, 2009).

"The essence of the proposal is that the collegial academic and discipline relevant debate and specification of academic standards pursued within institutions, and which are explicitly acknowledged to be appropriate, be writ large nationally."

The most serious concern is that the 'products' of the disciplinary standards networks will be appropriated by TEQSA for external regulatory purposes...

A more streamlined approach will be needed if the model of disciplinary standards networks is to be extended across more fields on a sustainable basis, and its purpose will need to be explicitly defined as providing references for internal institutional assessment and performance improvement rather than for external accountability. As an agency that is government funded and whose agenda in this area is being driven by government, the ALTC ought not to arrogate itself some sort of guardian role in respect of teaching and learning in higher education.

The most serious concern is that the 'products' of the disciplinary standards networks will be appropriated by TEQSA for external regulatory purposes rather than seen as guides for institutions in the design of curriculum, teaching and assessment. It would be an unacceptably retrograde step to have an external regulatory and auditing body determine institutional standards:

"One peril in trying to achieve common standards in a subject area across institutions is that this needs objectivity, which quickly becomes synonymous with quantification, with professional judgement dismissed as impressionistic. However, a disciplinary tradition depends on a community of scholars engaged in a common pursuit. The idea of an academic pursuit is scarcely intelligible without there being some sense of what it is to engage in it well or badly. Standards are therefore inherent in the very notion of a discipline" (Woodhouse, 2010).

3.5.7 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" (Sachs, 2010). A progress report is expected by end November and a redrafted Framework by December 2010, and a final report by 21 February 2011.

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.

There is very little information available other than to the institutions participating in the project, and their impression is that the outcome of the project will be a set of national teaching standards, institutional compliance with which is likely to be audited through TEQSA. That approach would represent an assault on university autonomy as well as being inconsistent with the stated workplace relations policies of the Australian Government.

3.5.8 MyUni website

The *MyUni* website (see Box 31) has been presented as an extension to Higher Education of the *MySchool* website model of providing 'transparent' information to parents about the comparative performance of schools on standardised tests of their students. The governments of Australia have agreed to a national curriculum for schooling, as well as, through the National Assessment Program: Literacy and Numeracy (NAPLAN), common testing of students in reading, mathematics and science, in grades 3, 5, 7 and 9. Notwithstanding the considerable problems associated with the application of that approach to schooling, 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 is ironic that a government which projects itself as committed to 'evidenced-based policy' should commit to such heroic but unsubstantiated claims in such an important area of public policy. It would have been beneficial to have prior market research into what students want to know in making their decisions about study options.

It would have been beneficial to have prior market research into what students want to know in making their decisions about study options.

Given the site is likely to include other higher education providers, Universities Australia has sensibly recommended to the Australian Government the name of the website be changed to *My Degree*.

Box 31. The purpose of *MyUni* website

"Informed student choice is particularly important in the new student centred system—because student choice will impact so much on institutional behaviour. We want students to make their decisions about where they want to study on the basis of robust information about the quality of education provided at each institution rather than on hearsay, inference from entry requirements or prestige. In the future Australian universities will be required to publish more information on their courses, campus facilities, support services and, most importantly, the quality of teaching and learning outcomes.

The My School website, which publishes vital information on school activities and achievement, has proved an enormous initial success and there are early indications that it is influencing parental decisions about enrolment and staffroom decisions about teaching strategies. I believe it's now time for us to consider something similar at the university level.

And so today I announce that the Government will implement a complimentary [sic] measure to the My School website a 'My University' website which will help inform students about institutions, courses and pathways. It will showcase the quality of Australia's higher education providers. It will be developed over time in partnership with the sector and it will commence no later than January 2012.

Information will be provided in an easily accessible form for students and parents, universities will be able to learn from the success of their colleagues and the learning outcomes and the quality of teaching of our universities will become better known in the general community. We know this is a major undertaking and the expertise of the sector will be vital in providing students and the public with the best information we can about institutional quality and learning outcomes."

Gillard, 2010.

The *MyUni* website requirements (see chart above) seem closer to the US College Portrait than to the European U-Map. Regrettably, the Government's focus on accountability for performance and outcomes has overshadowed its transparency objective, of providing information for prospective students to see the differences in the opportunities available to them, along with information about services and accessibility, so that they can select the program in the institution that best suits their needs.

3.5.9 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" (Australian Government, 2009). 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 October 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:

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.

- i. **Student participation:** universities will be required to maintain a base-line number of students for each number of students (based on number of students in 2010), and negotiate a percentage point increase in access share for those groups.
- 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.
- 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.

The concerns noted above (3.4.4) in relation to standardised tests and value added measures in the US context are also relevant in the Australian context.

3.5.10 Strengthening the Australian Qualifications Framework

The Australian Qualifications Framework Council (AQFC), a committee of the inter-governmental Ministerial Council for Tertiary Education and Employment (MCTEE), was formed in May 2008 with the following objective: “to provide strategic and authoritative advice to ministers on the Australian Qualifications Framework (AQF) to ensure it is nationally and internationally robust and supports flexible cross-sectoral linkages and pathways” (AQFC, 2010). With regard to policy advice, its terms of reference include “strategic strengthening of the AQF required to meet identified needs such as improving national consistency and contemporary relevance, including national and international portability”, and “national and international recognition and comparability of qualification standards and alignment of qualifications/standards frameworks” (AQFC, 2010).

The AQF is a tight-loose framework: it is ‘tight’ (prescriptive) for outcomes-based national VET awards and ‘loose’ (descriptive) for process-based awards of educational institutions, and it has been described as ‘weak’ in its capacity to achieve inter-sectoral seamlessness (Keating, 2003), and for its inability to

provide “external referencing for the standards and relativities of qualifications” (Keating, 2008). The “strengthening” purpose involves bringing the AQF within the new “national quality and regulatory framework”, removing distinctions between the (primarily competency-based) Vocational Education and Training (VET) and (primarily curriculum-based) Higher Education sectors’ qualifications models, prescribing levels of learning outcomes on a consistent basis, tightly mapping the levels to qualifications titles, and assigning study time. Rather than seeing the AQF as a reference tool, i.e. a set of qualifications descriptors, the AQFC envisages it as an instrument of reform.

Rather than seeing the AQF as a reference tool, i.e. a set of qualifications descriptors, the AQFC envisages it as an instrument of reform.

Box 32. Declared objectives of the Australian Qualifications Framework

“The objectives of the AQF are to:

- provide nationally consistent recognition of outcomes achieved in post-compulsory education;
- help with developing flexible pathways which assist people to move more easily between education and training sectors and between those sectors and the labour market by providing the basis for recognition of prior learning, including credit transfer and work and life experience;
- integrate and streamline the requirements of participating providers, employers and employees, individuals and interested organisations;
- offer flexibility to suit the diversity of purposes of education and training;
- encourage individuals to progress through education and training by improving access to qualifications, clearly defining avenues for achievement, and generally contributing to lifelong learning;
- encourage the provision of more and higher quality vocational education and training through qualifications that meet workplace requirements and vocational needs, thus contributing to national economic performance;
- promote national and international recognition of qualifications offered in Australia”

AQFC, 2010.

The agenda for reform relates primarily to an industry-driven, competency-based training system, and the facilitation of lifelong learning through pathways and credit transfer (see Box 32). When this agenda was initially mooted in the early 1990s, it was opposed vigorously by the university sector, and aggressively by the then Vice-Chancellor of the University of Melbourne, David Penington (Penington, 2010). It was seen to be inappropriate to apply to higher education the notion of nationally standardised codified knowledge in the form of units of competency (Bowden & Masters, 1993). As a result, higher education sector qualifications were not absorbed into the competency model developed for the training sector.

The first bullet point in Box 32 confuses expectations and performance, and its ambiguity fuels the fires of concern about the policy intent of the entire new quality and regulatory arrangements. In what way can a qualifications framework “provide nationally consistent recognition of outcomes”? Presumably, it is understood that a qualification at a given level testifies to a set of competences which are common and equivalent, and these competencies will be recognised uniformly throughout Australia. The second bullet refers curiously to education and training sectors, but the proposed new AQF removes sectoral distinctions. The third bullet is unclear: what “requirements”, if any, does the AQF generate? The fourth bullet defines a (desirable) characteristic of qualifications and levels descriptors. The fifth bullet is aspirational but the objectives outlined are not a direct consequence of the AQF.

With regard to these five matters, the appropriateness of their assumptions and the practicality of their application are considered in Part 4.4 below. At this point it can be noted that there are major policy purposes, relationship issues, conceptual dilemmas and change management challenges to be

addressed. One set of issues concerns a singularity of purpose or a balance of different purposes for qualifications (Keating, 2008). A second set of issues concerns the centralisation or distribution in the ownership and management of qualifications (Allais, 2007; Keating, 2008). A third set of issues involves the construct of knowledge and learning within qualifications (Young, 2007; Keating, 2008; Wheelahan, 2009). A fourth set of issues concerns the management of change (Raffe, 2009b; Raffe, 2009c).

The sixth bullet in Box 32 encapsulates the primary purpose of the 'strengthened' AQF. It reflects a predominantly Vocational Education and Training (VET) perspective, which is not surprising in view of the (schools and VET) portfolio responsibilities of the majority (State & Territory) members of MCTEE. Missing is any reference to the role of higher education qualifications, such that one would expect a separate framework along the lines of the English approach outlined above (at 3.2.1). The seventh bullet represents normal expectations of national qualifications frameworks around the world.

Interestingly, there is no reference to the AQF as an instrument for consumer protection. Yet in defending its arbitrary and parochial decision to prohibit qualifications types and titles in the AQF that are offered reputedly internationally and for which there is student demand, and in some cases for which the Australian Government has been funding places, the AQFC has justified its stance on grounds of consumer protection (Doolette, 2010).

3.5.10.1 University concerns

In its July 2010 consultation paper, the AQFC proposed several changes of significant concern to universities (see Box 33). No country in the world has a qualifications framework relating to higher education that is so prescriptive and narrow.

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 (Raffe, 2009b), rather than an assumed starting point. As noted above, 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 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.

Box 33. Key proposals for strengthening the AQF

- Replacement of current sectoral divisions (e.g. VET, HE) with a single set of award levels, thereby focusing on the qualification as testimony to skills formation, however and wherever achieved
- 10 levels of increasing complexity against which qualification types are located
- 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"
- Notional duration of student learning for each qualification type
- Tight mapping of qualifications types and titles to levels of learning outcomes
- Restrictions on the use of qualifications titles
- Automatic learner entitlement to a base level of credit transfer for previously completed awards.

AQFC, 2010b.

The latest version of the strengthened AQF reforms (2010a) reflects the earlier draft with one important expectation, credit transfers entitlements are no longer automatic but are to be negotiated between institutions or between students and institutions around sound educational considerations.

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" (Tuck, 2007), that "the most successful NQFs appear to be those with the most modest ambitions for system change" (Raffe, 2009a), and concerns about the narrowing impact on education of competency-based assessment and the consequential adverse effects on those most disadvantaged in terms of educational backgrounds (Allais, 2003; Allais, 2007; Wheelahan, 2009).

Perhaps the AQFC seeks to promote the status of VET through parity of esteem of VET credentials with higher education qualifications, and easier access for people with VET qualifications to higher education programs. However worthy that may be, there are several matters that deserve discussion before it is a taken-for-granted good thing to do.

The AQFC is proposing a 'unified' framework with no tracks and a common taxonomy of learning outcome descriptors mainly related to occupational competences.

Why would this approach not lead to a perceived subordination of VET to higher education? To what extent would such an approach devalue VET credentials as worthwhile for ends other than as pathways to higher education, such as direct employment outcomes? How much additional pressure would the approach put on credential inflation? Would the approach encourage 'academic drift' in vocational education? Presumably the status of VET is important for attracting people to develop the skills for important areas of labour market need, but would changing the qualifications framework in the way proposed be a stronger incentive than improved wages and working conditions in the occupations and industries where VET graduates are employed? And what are the risks for higher education in being regarded no differently than vocational education? Would we see greater numbers of graduates more trained but less educated?

It may be true that graduates of all qualification types need a blend of knowledge, knowledge-related skills and generic skills, in order to perform in non-routine jobs, as discussed at 2.4 above, but the nature of the blend does not necessarily follow only a vertical line of increasing complexity. There are also differences in the nature of knowledge and learning, and the relation of learning with people, place and subject matter. This issue is discussed in Part 4 below, with reference to competency-based training and national qualifications frameworks.

A threshold question for any NQF is how many levels of learning outcomes descriptors it should have. No rationale has been advanced by the AQFC for selecting 10 levels rather than 8 (EQF) or more (Scotland). The proposed dilution of the Level 10 descriptor is symptomatic of a deeper problem. The current AQF makes it clear that expected learning outcomes at Doctoral level (the current highest qualification level) are "assessed externally against international standards and produce an output with a high level of originality and quality". The proposed 'strengthened' AQF deletes these characteristics, but that would be to diminish the international reputation of Australia's highest qualification level.

The AQFC is proposing to remove, and effectively prohibit, a range of qualifications titles including commonly used qualifications currently offered by higher education institutions and funded by the Government in Australia, e.g. Bachelors of Law (LLB), Postgraduate Diploma of X, tagged degrees such as Bachelors of Business (Marketing), or Juris Doctors (JD). Many of these titles have an historical basis and/or are internationally recognised. The proposed issuance policy limiting the use of qualifications

titles is inconsistent with the depiction of the structure of the AQF in the draft Framework policy document:

“The structure of levels enables more than one qualification type of similar complexity but different focus to be accommodated at each level” (AQFC, 2010).

A more coherent approach is to permit institutional discretion over the nomenclature of awards, within the bounds of common practice in Australia or internationally. This approach aligns with the Bologna Process where the various qualifications titles of countries are referenced to 8 levels of expected learning outcomes on the European Qualifications Framework (EQF). In Australian practice, some qualifications with similar titles fall into different levels. For instance a Master’s degree that builds upon previous study in a discipline is different from one that introduces the student to a discipline for the first time. Hence it is appropriate to find the ‘Master’ title in either Level 8 or 9, depending on the level of learning outcomes expected. In the case of the Doctor title, similarly, there are doctorates which are 100% or at least two-thirds research based, whereas others, including some professional doctorates involve less than one third research. Thus the sensible approach is to acknowledge that doctorates can be classified at either level 9 or 10 depending on research intensity. Additionally, there are several qualifications of reputable international currency that represent level 9 rather than level 10 learning outcomes, e.g. MD, DVM or VMD. By what reasoning should Australian universities be prohibited from offering Australian students qualifications that give them international mobility, and forbidden from competing in this segment of the international market?

The AQF Council in its July 2010 consultation paper proposed an extraordinary level of prescription over credit transfer. In that paper it specified “base levels of credit transfer for completed AQF qualifications [which] will be awarded to students” (AQF Council, 2010). For qualifications in the same discipline it is specified, for example, that “completed qualifications at levels 5 and 6 will result in 33% credit towards level 7 qualifications”. For completed qualifications in a different discipline it is specified that completed qualifications at levels 5 and 6 will result in 10% credit towards level 7 qualifications.

Such a credit transfer policy is totally arbitrary, too prescriptive, cuts across university autonomy and undermines academic integrity. It assumes equivalence of programs (which may be structured very differently) and does not allow for qualitative differences. Most importantly, it does not acknowledge a university’s responsibility to assess what is best for the student in obtaining the learning outcomes desired. Where an institution does not think a student will effectively complete the course, given prerequisites and progression requirements, if the student must be granted the stipulated AQF credit, the institution may decide not to admit him/her to avoid any review processes. Thus a ‘reform’ designed to open learning pathways may actually block them.

The AQFC’s final advice paper of October 2010 has softened automatic to ‘negotiated’, referring to its July specifications as guidelines reflecting what would be normally expected while having regard to: learning outcomes; volume of learning; program of study, including content; and learning and assessment approaches.

Nevertheless, the AQFC’s credit transfer policy thinking misunderstands the differences in the nature of knowledge and learning between the cultural and human capital traditions (Keating, 2008) and the structure of learning required for different occupations (Muller, 2009).

3.5.10.2 The intended use of the AQF as a regulatory instrument

The closed nature of the policy development process relating to the accountability for quality agenda is of particular concern to Australian universities. The process does not accord with the Council of Australian Government Best Practice Regulation guide

The question arises as to whether ministers can sign off on arrangements which have not been developed in accordance with COAG’s own principles.

(COAG, 2007). See Box 6. In particular the regulatory impact of the strengthened AQF has not been a matter for public discussion. It needs to be. Indeed COAG's own public policy principles stipulate much fuller consideration of options, benefits and costs of different degrees of interventions, and the effects on stakeholders, including education providers. The question arises as to whether ministers can sign off on arrangements which have not been developed in accordance with COAG's own principles.

Box 34. Principles of Best Practice Regulation

COAG has agreed that all governments will ensure that regulatory processes in their jurisdiction are consistent with the following principles:

1. establishing a case for action before addressing a problem;
2. a range of feasible policy options must be considered, including self regulatory, co regulatory and non-regulatory approaches, and their benefits and costs assessed;
3. adopting the option that generates the greatest net benefit for the community;
4. in accordance with the Competition Principles Agreement, legislation should not restrict competition unless it can be demonstrated that:
 - a. the benefits of the restrictions to the community as a whole outweigh the costs, and
 - b. the objectives of the regulation can only be achieved by restricting competition;
5. providing effective guidance to relevant regulators and regulated parties in order to ensure that the policy intent and expected compliance requirements of the regulation are clear;
6. ensuring that regulation remains relevant and effective over time;
7. consulting effectively with affected key stakeholders at all stages of the regulatory cycle; and
8. government action should be effective and proportional to the issue being addressed.

COAG, 2007.

In the revealed agenda the dots are not seen to be joined, for instance, between the role envisaged for TEQSA and the elements of the Higher Education Standards Framework, including the role of the AQF, and conditions for provider registration and eligibility for government funding. In the unrevealed agenda they seem to be more congruent than most stakeholders would expect, but contentiously so.

The first Draft Higher Education Provider Registration Standards (DEEWR, 2010) were designed in accordance with a number of principles, one of which was stated as "The Standards and Requirements are consistent with (and make reference to) other requirements and standards for higher education providers in Australia, e.g. standards mandated by the Australian Qualifications Framework" (DEEWR, 2010). The associated draft 'standards for programs' outline the following requirements:

1. *"The titles, durations and workloads and characteristics of learning outcomes for all the provider's higher education programs comply with AQF criteria and accurately reflect the nature and level of the programs"*
2. *"The provider has student admission requirements that are consistent with AQF requirements and ensure that students have adequate prior knowledge and language competency to undertake the program successfully"*
3. *"The provider ensures that credit for previous studies or skills (including credit transfer, articulation and recognition of prior learning) meets AQF criteria and that the amount of credit given preserves the integrity of the AQF qualification to which it applies"* (DEEWR, 2010).

This cross-referencing of the registration standards with AQF 'policies' and 'requirements' signals a major shift in national policy. For universities it is a dramatic and disturbing shift. Universities have conventionally been accorded discretion to determine the criteria and processes relating to student admissions, staffing appointments, curriculum, pedagogy and assessment, and the awarding of qualifications.

In the public view, the AQF has been understood to be, what national qualifications frameworks are elsewhere: a set of descriptors designed to outline the structure of qualifications in a national education system in ways that enable equivalences of qualifications from different countries to be compared. However, as noted at 2.7 above, some interest groups attach their political agenda to this pursuit, whether to reform particular educational processes, or to promote learning pathways and credit transfer. Nevertheless, there is no agreement, anywhere, that the AQF descriptors are binding. Indeed, they are merely guidelines, and they are based on advice from universities and other institutions:

"Australian universities are established by or under relevant state, territory and commonwealth legislation and have authority to accredit their own courses. The AQF guidelines for Higher Education qualifications reflect advice from these institutions, as do the AQF qualification titles used widely by the other self-accrediting institutions (together with a small number of local titles)" (AQF Register, 2010).

Legislation for the establishment and governance of individual universities confers very broad autonomy with regard to courses, awards and academic standards. The university establishment acts do not refer to external quality assurance frameworks. The funding agreements (compacts) between the Commonwealth and individual universities make no mention of the AQF. The AQF has no legal status or power in its own right.

However, there are cross-references to the AQF in the Higher Education Support Act, 2003. That Act (HESA) defines an Australian university as "a body corporate: that (a) meets the requirements set out in the National Protocols for entities referred to in the National Protocols as Australian universities; and (b) whose name is included, or who owns or controls a business name that is included, in the Australian Qualifications Framework Register as an Australian university". Additionally, HESA makes specific references to VET courses and the requirement that VET courses are accredited by a VET Course Accrediting Body listed in the AQF Register. Self-accrediting institutions also need to be listed on the AQF Register. Hence, to be eligible for Commonwealth funding a university must be listed on the AQF Register. However, listing on the register involves no obligation.

The *National Protocols for Higher Education Approval Processes* constitute an inter-governmental ministerial agreement. The Protocols specify that: "Any institution that offers Australian higher education awards must comply with AQF higher education titles and descriptors" (*Protocol A 3.7*); "A self-accrediting higher education provider (HEP) must have effective and comprehensive structures and processes to set standards for AQF qualifications equivalent to Australian and, where relevant, international standards" (*Protocol C 3.2*); "An overseas HEP that seeks registration/accreditation to operate in Australia will be assessed on its capacity to offer Australian qualifications that comply with the AQF" (*Protocol C 6.6*). Nevertheless, the National Protocols are not legally binding; they do not override the powers of university governing bodies. Any legal requirements relating to the National Protocols derive from legislation passed through the Commonwealth and/or State & Territory parliaments.

The *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students, 2007* is a set of nationally consistent standards that governs the protection of overseas students and delivery of courses to those students by providers registered on *Commonwealth Register of Institutions and Courses for Overseas Students* (CRICOS). The National Code is established under the *Education Services for Overseas Students Act, 2000*. To become CRICOS-registered a provider

This cross-referencing of the registration standards with AQF 'policies' and 'requirements' signals a major shift in national policy.

The AQF has no legal status or power in its own right.

must demonstrate that it complies with the requirements of the National Code. The National Code complements existing national quality assurance frameworks in education and training including the Australian Quality Training Framework (for registered vocational education and training providers offering these courses) and the *National Protocols for Higher Education Approval Processes* (for institutions offering higher education qualifications).

The National Code is legally enforceable and breaches of it by providers can result in enforcement action under the ESOS Act. This includes conditions being imposed on registration and suspension or cancellation of registration of accredited providers, but this does not apply to self-accrediting institutions. Only CRICOS-registered courses can be offered to international students studying in Australia on a student visa. The Code specifies that “A course cannot be registered on CRICOS unless it meets the relevant Australian Qualifications Framework requirements or those of any other appropriate quality or accreditation framework, if an appropriate framework exists”. (*National Code, C.7.1*). In practice, a university, as a self-accrediting institution, provides information to the state/territory CRICOS registering body, including information about the process by which the university authorised the proposed program (e.g. by attaching the minutes of the Academic Board or Education Committee or equivalent). Such information may make no reference to the AQF, because a university is not constrained by the AQF.

However, there are different practices among the states and territories. To comply with migration laws, international students are required to complete a course within its ‘expected duration’. The normal duration of a course may be established by the appropriate quality assurance framework for that sector (e.g. the Australian Qualifications Framework, relevant state and territory government legislation or guidelines). The *NSW Higher Education Act 2003* stipulates that “A course of study may be accredited in relation to an education institution only if the Director-General or institution, as the case requires, is satisfied that the course complies with the requirements of the Australian Qualifications Framework” (*section 7(2)*). Legislation and regulations appear to be less overtly prescriptive in other states and territories. However, state and territory accreditation authorities publish guidelines on their websites which specify that, in order to be accredited, higher education courses (other than those awarded by universities) must comply with AQF requirements. Tasmania’s guidelines require that, in order to be registered, a (new) university’s qualifications must comply with AQF requirements, and universities must provide “details of how course development, approval and review processes take into account AQF requirements and standards within Australian and international universities”.

If the AQF were to be made part of the regulatory regimen, under the Commonwealth statute establishing TEQSA, universities would effectively forfeit their self-accrediting status in respect of all the programs they offer. Additionally, the states and territories would find that an agency established under Commonwealth statute would have powers overriding state laws relating to the authorising of universities to operate. Such fundamental changes to the status of universities and the powers of the states ought not to be surrendered lightly.

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4. Shifts, supplements, definitions and debates

This part looks at the extent of change envisaged by the proponents of the accountability for quality agenda in higher education, with a particular focus on the implications for universities. It examines the meaning of key terms and important distinctions that have implications for policy. It explores areas of ambiguity and contention with a view to deriving some operating principles for consideration in the following part. The main matters considered are: the respective roles of higher education institutions, governments and markets; the implications of different emphases on accreditation, assessment and quality assurance; the compatibility of accountability and improvement purposes and procedures; the assumptions underpinning national qualifications frameworks and competency-based learning and assessment; the issues of fitness of purpose and fitness for purpose; the intent, scope and feasibility of a standards-based approach; the extent to which 'consistency' rather than 'comparability' is desirable; and the 'transparency' agenda.

4.1. Shifts

The foregoing outlines of drivers and developments go some way to explaining the shift "from a trust-based to a regulatory approach" in respect of higher education quality (Harvey & Williams, 2010). However, there are overlapping motives on the part of various players, and these are potent not only in determining whether a more statist model will prevail but to what ends and how it should function. That outcome will depend in part on the tactical considerations discussed later in Part 5, and an appreciation of the substantive policy issues involved.

The accountability for quality agenda envisages, and to some extent is predicated upon, a number of shifts, conceptual and operational, including some substantive changes to the orientation, character and control of higher education. But just as the drivers discussed in Part 2 above are double-edged, and the developments outlined in Part 3 are ambiguous, so with the destinations; the points of arrival are forked.

One set of shifts is in the relations between governments and higher education institutions, including incursions by government into matters that have traditionally been the preserve of academic judgement. The action in this field may be seen to be contested between autonomous universities and "the evaluative state" (Neave, 1988; Neave, 1998; Dill, 1998; Dill, 2004). It expresses itself, for instance, in government assuming a central role in specifying qualifications and associated expectations of learning outcomes. In effect, the qualifications become "national property" rather than being owned by the educational institutions themselves (Tuck, 2007), but that transfer undermines the foundations that sustain them:

"The governance of qualifications continues to and needs to reside with their owner institutions and user communities. The alternative to these arrangements is to locate their ownership and management in a central agency. The consequences of this approach are likely to be the weakening of the 'communities of trust' (Young, 2008) upon which qualifications depend for their currency" (Keating, 2008).

A related expression of the imposition of the evaluative state is the insistence by governments that institutions provide evidence that learning goals have been met, through direct measures of student abilities. The assessment grades given by teachers, the graduation rates of students, the employment rates of graduates, and other indicators are no longer seen to be sufficient. To obtain hard evidence of student attainment, there is pressure for more systematic application to graduating cohorts of standardised tests, which previously institutions may have used primarily for diagnostic purposes, and mainly for commencing students, with a view to improving performance. The accountability requirements of governments may override institutional improvement efforts.

The accountability requirements of governments may override institutional improvement efforts.

Another set of shifts is from supply to demand drivers. In the VET sector, an 'industry-led' approach privileges enterprise requirements above both education and training provider purposes and interests, and the wider personal interests and development needs of individuals. In the Higher Education sector, a 'student-driven' approach prioritises individual interests above both provider and national development interests. But this is not a coherent set of shifts, within or between sectors (as noted above, in Australia the industry-led approach to VET is being diluted by greater attention to student needs), and its contradictions confound the building of relations across qualifications and learning pathways.

A related set of shifts is that from differences to similarities between vocational and academic qualifications. What were once seen to be distinct abilities (practical v theoretical), and more recently seen to be overlapping or blurred, in terms of provider types and knowledge-related and generic learning goals, are now seen by some to be convergent or even integrated. Differences in the kind of learning have been reduced in policy discourse to differences in the degree of complexity of learning. It is true that higher education graduates need to develop a broader set of generic skills in the contemporary context than traditional disciplinary studies may have enabled, not least given their employment destinations beyond the fields in which they studied. However, several professional fields (e.g. Engineering, Pharmacy) already have broader domain-related competencies embedded in the curriculum of their degree programs for professional accreditation. It is also true that VET graduates should have opportunities to develop broader personal capabilities and knowledge underpinnings than a functionalist approach to competency-based training often allows, even within the trades where graduates are more likely than others to stay within their fields of training, not least because they have a right to develop beyond the confines of their immediate work or social context. This is to recognise the liberating role of education.

However, it is not self-evident that learning in the cultural tradition of higher education and learning in the instrumental tradition of vocational education leads to commensurate achievements and to transferable capacities, nor that it should or can, whether for highly-skilled technical areas or higher levels of disciplinary specialisation. It is not that one set of achievements deserves to be perceived as vertically superior to another. Rather, the different achievements should be seen horizontally as equally deserving but intrinsically different in purpose, nature and outcome. Policy directions which fail to champion the significance of technical and vocational education, but subordinate it to higher education, demean the former and reduce the latter. The fusing of vocational and general education along a continuum of generic cognitive skills may well dilute specialisation of learning, not only for the para-professional occupations but also for the trades and technical and professional occupations for which the supply of talent is most important and least available.

Another set of shifts is that from higher education enmeshed in the nature of the learning experience to outcomes treated independently of the ways and means of achieving them. An expression of this shift is that from institution-based to outcomes-based qualifications; from qualifications that are primarily identified with the institutions that provide the programs to qualifications that are expressed as de-contextualised statements of learning outcomes (Young, Allais & Raffe, 2009).

The learning environment cannot be abstracted away as if it is irrelevant to the nature of learning, which is integrated as well as cumulative. It is an experience, the character of which varies place by place, issue by issue, over time, through error, feedback and reflection. What students learn from a set of structured learning opportunities is basically up to them but it can be infused with a sense of purpose or a desire to discover that permeates the institution or department where they learn; and they may learn significant things inadvertently or incidentally through the unstructured opportunities and the cultural norms that their learning environment provides.

The current focus on 'learning outcomes', conceived of as skills separated from domain knowledge, which can be tested generically, gives emphasis to pedagogy rather than to curriculum. Yet it is the design of curriculum that is fundamental to students being able to access the knowledge that is central to their chosen field of study. And unless there is a national curriculum, the comparison of results from standardised tests will reveal at best only the most superficial aspects of graduate capability. Perhaps some envisage a national curriculum to be just as necessary in undergraduate education as it is in primary and secondary schooling; but that is a debate no one has yet put squarely on the agenda. Such an intention would be difficult to justify. The state may have legitimacy in setting a national curriculum for compulsory education but what is its source of authority in respect of non-compulsory education?

These various shifts, taken together, can be threatening because they affect matters of fundamental importance to higher education and particularly to the university as a social institution of a unique kind. They involve 'homogenising' tendencies, which risk a loss of differentiation among institutions and programs, and 'fractionating' tendencies which risk a loss of the sense of the whole in respect of complex human capacities (Ewell, 2010). And when they are seen as externally-pushed moves, away from valued and professionalised ways of knowing, learning and working in the academy, they may provoke defiance.

Another set of shifts is that from higher education enmeshed in the nature of the learning experience to outcomes treated independently of the ways and means of achieving them.

4.2 Supplements

Another way of viewing the change agenda is to regard the new accountability expectations as a supplement to academic professionalism—a new dimension of transparent reporting responsibility. Rather than regarding the changes in expectations, references, measures and reporting requirements only as a shift from the internal exercise of professional judgement, they can be seen as making the criteria for assessment more transparent to external communities and also for continuous improvement within higher education institutions. Thus it is not necessarily a shift away from the application of tacit knowledge in forming judgements but an opportunity to make the implicit explicit, as far as possible, to students, graduates, prospective students, employers and others who take an interest in the meaning grades awarded through the exercise of professional academic judgement.

A professional approach to improving student assessment for the institutional purpose of improving teaching effectiveness and learner success can lead to the availability of better information about learning and learning outcomes. Conversely, community and government requirements for improved transparency and more comparable reporting of attainment can act as a stimulus to improved assessment. In such a purposeful context, what has been long presented, especially in US debates, as a dichotomy between ‘accountability’ and ‘improvement’ may become reconcilable.

Enlargement of higher education participation increases the diversity of students and the demand for services in terms of curriculum orientation, study modes, places and times for learning, and trade-offs between convenience, quality and price. This more student-driven and competitive context calls for the supplementation of quality assurance mechanisms established in a supply-driven era, such as ‘fitness-for-purpose’ according to institutional mission, with more consumer-oriented information, such as comparability of different institutional offerings.

Additionally, in this more demand-driven environment for higher education, it may be seen that students and other interested parties no longer rely on the authority and claims of providers but seek out authenticity from other sources, including commercial guides, ratings and rankings, and the reported experiences of other students and graduates through social networking and other forms of communication. Thus traditionally self-referenced academic criteria, however necessary they may continue to be, are seen to be no longer sufficient to satisfy the information needs of prospective students and their families.

However, supplementation does not mean replacement; supplementation of quality assurance with stronger standards-based registration of providers and greater transparency in the availability of information for students and other interested parties, can stand alongside quality assurance of the fitness-for-purpose model which reflects the diversity of institutional mission. Neither do demand-driven approaches to higher education financing or consumer-oriented enhancements to the provision of information to guide student choice, supplant provider interests. Indeed demand can be seen to be shaped by the nature of supply to such an extent that the very notion of fitness for purpose, which is based on meeting customer requirements, turns on the position of suppliers in the market, what they offer and how they promote their advantages (Harvey & Green, 1993).

...supplementation of quality assurance with stronger standards-based registration of providers and greater transparency in the availability of information for students and other interested parties, can stand alongside quality assurance of the fitness-for-purpose model which reflects the diversity of institutional mission.

For higher education, which is an ‘experience good’—something whose value cannot be ascertained until after it has been purchased (Nelson, 1970), or even a ‘credence good’—something whose worth is not known even after its consumption (Bonroy & Constantatos, 2008), and a ‘positional good’—something whose value depends largely on its ranked desirability (Hirsch, 1976), the important thing for students to know in advance (at least for those who make considered decisions) is what different opportunities are available to them and the relative advantages of the alternatives. Students do not know before they undertake a course what they are going to learn. It is important for prospective students to understand what distinguishes one learning option from another.

Accountability to clients in competitive markets for higher education services requires that public information to guide choice, on the one hand, and report on effectiveness, on the other hand, reveals what is different rather than what might appear to be the same:

“Programs and institutions should be held accountable for their particular purposes and on the basis of whom they serve. Those who view accountability from a system-level perspective should recognize explicitly how institutional goals differentially contribute to broader societal goals by virtue of the different individuals and objectives the institutions serve. Promulgating common measures or metrics, or at least comparing performance on common measures, does not generally serve this purpose” (Borden 2010).

From these considerations, three imperatives for supplementation emerge. The first is to improve the provision of information to inform student choice, through provider institutions increasing their **transparency** by clarifying their objectives and offerings, as well as the criteria they use when making professional decisions. The second we might designate as the ‘threshold’ or Spellings concern about institutional **effectiveness**: how do we know that students are learning adequately? The third is ‘beyond the threshold’ or the UK House of Commons Select Committee concern about **comparability** of student attainment: how do we know whether there are real differences in the achievement of graduates from different institutions? In exploring the possibilities for operationalising these supplements, while being conscious of the risks associated with the shifts outlined above, and with a view to reconciling varying claims, it is necessary to clarify the meaning of key terms.

4.3 Definitions

The purpose of this section of the paper is not to settle upon specific definitions but rather to elucidate the different emphases associated with the varying use of basic terms, with a view to exploring the prospects for shared understandings of policy intent and possible areas of common ground.

Regrettably, there is little consistency, let alone consensus, over the meaning of even the most commonly used terms. Sometimes, the same term is used in relation to different factors, or different terms are used to describe similar factors; e.g. 'outputs' and 'outcomes' can be used interchangeably. At other times, different meanings derive from different contexts; 'competence' and 'employability' have different meanings in the European context than in the English or Australian contexts (Brockmann et al., 2008). And at times, definitions are constructed with a hint of sophistry and with a view to directing change according to the preferences of the defining agency; e.g. outcomes may be defined as 'direct' measures of achieved learning and contrasted with 'proxy' measures of graduate success such as employment and income consequences (Nusche, 2008), even though the direct measures are themselves proxies, such that we get 'primary' and 'secondary' proxies:

"Outcomes of higher education are not limited to learning outcomes. Students can benefit from their HEI experience in many different ways, such as better social status, higher employment rates, civic engagement, opportunities to pursue further studies, or simply leading a more fulfilled life (Ewell, 2005). While such outcomes are related to learning, they should not be confused with the actual mastery of knowledge, abilities, and skills that result from students' engagement in HEI learning experiences (Ewell, 2005). Such long-term social and economic benefits of the HEI experience can serve as secondary proxies for learning outcomes, but they are not direct outcomes of learning" (Nusche, 2008).

In a similar vein, Shavelson, one of the developers of the Collegiate Learning Assessment instrument, focuses on 'direct' rather than 'indirect' measures of learning, because the former relate to "actual learning as a relatively permanent change in observed behavior over a period of time" (Shavelson, 2010).

Some may regard quibbling over definitions as indulgent. But clarity of policy intent requires clarity of definition. Ambiguity in the use of terms may reflect complexity but it may also permit permissiveness and licence authoritarianism. The ambiguous use of basic terms relating to the accountability for quality agenda in higher education sets off alarm bells, but curiously they are not resonating. One wonders why.

The ambiguous use of basic terms relating to the accountability for quality agenda in higher education sets off alarm bells, but curiously they are not resonating.

4.3.1 Inputs, processes, outputs and outcomes

In a background paper for the OECD's AHELO project, Nusche (2008) offers the following definitions:

Inputs are the financial, human and material resources used, such as funding and endowments, faculty and administration, buildings and equipment.

Processes (or Activities) are actions taken or work performed through which inputs are mobilized to produce specific outputs. Examples of higher education activities include curriculum design and teaching.

Outputs are anything that an institution or system produces, e.g. articles published, classes taught, educational material distributed, and degrees awarded.

Nusche does not include graduates in the category of outputs, although she does include 'degrees awarded' (by implication the people to whom they are awarded). If one regards graduates as outputs then outcomes may be seen as the benefits that graduates obtain from their achievement, whether employment, income, and wellbeing, as well as the contributions that graduates make to society. The question of how to classify graduates in an educational 'system' is complicated by the fact that students are inputs and co-producers, learning is an interactive experience, and graduates are people who, because they learn, cannot be neatly or normatively defined.

Nusche treats outcomes separately, distinguishing between intent and actuality: "Outcomes describe what the student actually achieves as opposed to what the institution intends to teach" (Allan, 1996). She goes further to suggest that "Inputs, activities and outputs have little intrinsic value in terms of student learning. They are only the intermediate steps that may or may not lead to outcomes or benefits" (Nusche, 2008). But what accounts for learning in this view, or doesn't that matter? If learning is understood as an independent variable why bother with teaching? There is a basic flaw in the logic for understanding education. Nusche (2008) appears to confuse differences between actuality and intent, which result from inappropriate or ineffective processes, with differences between cause and effect.

Given Nusche is setting the scene for testing direct learning outcomes across different contexts, it may be understandable that she narrows the scope through definitions in order to focus on student achievement. Thus, borrowing from the pioneers of the controversial model of 'outcomes-based education', and focusing on the summative rather than the formative purposes of assessment, Nusche takes a behaviourist approach, echoing Shavelson (2010): "In behavioural terms, learning outcomes have been defined as something that can be observed, demonstrated and measured" (Nusche, 2008):

"Outcomes are clear, observable demonstrations of student learning that occur after a significant set of learning experiences... Typically, these demonstrations or performances reflect three things: (1) what the student knows; (2) what the student can actually do with what he or she knows; and (3) the student's confidence and motivation in carrying out the demonstration. A well-defined outcome will have clearly defined content or concepts and be demonstrated through a well-defined process beginning with a directive or request such as 'explain', 'organize', or 'produce'" (Spady & Marshall, 1994).

By a different logic, one that acknowledges the complex interactions involved in learning but looks to a measurable end effect, a similarly reductionist approach has been adopted by AUQA in its 2009 discussion paper on measuring and monitoring academic standards. Here the argument is analogous to the cement mixer whose inner working are not readily observable, but the strength of the mix can be tested once poured:

"A large number of important variables influence how well students achieve. These include: student backgrounds; students' knowledge and skills on entry to a course; the design of individual courses and degree programs; how much effort students make; institutional resourcing levels for teaching; and the quality of teaching. Gathering data about and evaluating these types of input and process variables is a very valuable exercise, particularly for each institution's own continuous improvement, but limiting the scope of quality assurance procedures strictly to these cannot substitute for a direct focus on achievement itself. Primarily, this is because the various inputs and processes interact in complex ways, and are not deterministic. An explicit focus on academic achievement, however, examines the net learning effect of all the variables operating together. It thus serves two purposes. It allows the attained level of achievement to be assessed and recorded (as grades on student transcripts, for instance), and it allows evaluation of how well the teaching and learning system is working" (Woodhouse & Stella, 2009).

These approaches of Nusche (2008) and Woodhouse & Stella (2009) can be seen to share a positivist view which (falsely) represents social reality as existing objectively and independently of those whose action and work actually produces the conditions observed (Horkheimer, 1937). Additionally, they reduce the notion of learning to 'academic achievement'. The AUQA approach is particularly narrow, with its focus on cognitive achievement. Nusche takes a wider taxonomical approach, including cognitive and non-cognitive learning outcomes (see Box 35). Of particular note is her exposition of the possibilities for assessing generic skills independently of knowledge and learning contexts. Importantly, domain knowledge and domain-specific skills are not readily transferable.

Box 35. Cognitive and Non-cognitive learning outcomes

Cognitive outcomes

Knowledge outcomes

General content knowledge refers to the knowledge of a certain core curriculum whose content is considered essential learning.

Domain-specific, or subject-specific, knowledge outcomes refer to acquired knowledge in a particular field, such as biology or literature. Assessments focusing on domain-specific knowledge outcomes are particularly useful to compare learning quality in a particular field across different institutions.

Skills outcomes

Cognitive skills are based on complex processes of thinking, such as verbal and quantitative reasoning, information processing, comprehension, analytic operations, critical thinking, problem-solving and evaluation of new ideas. There is some disagreement as to whether such thinking processes are generic (following general patterns) as opposed to being field-specific. Assessments aiming to compare learning outcomes across different courses often focus on generic skills outcomes.

Generic skills. The common characteristic of all generic skills outcomes is that they transcend disciplines. They are transferable between different subject areas and contextual situations. Such skills are not directly tied to particular courses. They relate to any and all disciplines and they allow students to be operational in a number of new contextual situations (Pascarella and Terenzini, 2005). Generic skills outcomes can be assessed using tests that are based on application rather than on knowledge, thus focusing on students' ability to solve intellectual problems. Usually, students are asked to provide constructed answers that also give evidence of writing skills. Focusing on outcomes in terms of skills may allow comparing how well programmes and institutions with diverging missions and ways of teaching achieve to develop certain common skill dimensions in students. Yet, there are some doubts as to whether such outcomes can really be connected to the university experience.

Domain-specific skills are the thinking patterns used within a broad disciplinary domain, such as natural sciences or humanities. They are stated in terms of methods of enquiry, ways of evaluating evidence, and patterns of procedure necessary to confront new contextual situations in specific fields of study. They involve an understanding of how, why, and when certain knowledge applies. Domain-specific skills are not entirely transferable throughout subject areas.

Non-cognitive outcomes

Non-cognitive development refers to changes in beliefs or the development of certain values.

Psychosocial development includes aspects of self-development such as identity development and self-esteem, as well as relational developments such as students' relationships with people, institutions and conditions. Relational outcomes include interpersonal and intercultural skills, as well as autonomy and *Attitudes and values*.
Nusche, 2008.

Outcomes-based education (OBE)

OBE has many variants (e.g. *mastery learning*, *performance-based education*) but generally refers to a student-centred learning philosophy that focuses on measuring student performance (*outcomes*), in contrast with traditional education, which focuses on the resources (*inputs*) available to the student. OBE does not specify or require any particular style of teaching or learning. Instead, it requires that students demonstrate that they have learned the required skills and content. In practice, such as in secondary schools in Western Australia, OBE promotes curricula and assessment based on constructivist methods and discourages approaches based on direct instruction methods and preferencing of classic texts. However, the terminology can be used in a less extensive and prescriptive way. For example, the University of Western Australia has distilled its approach in the following way:

"A Student Learning Outcomes approach focuses on student learning by:

- 1. Using learning outcome statements to make explicit what the student is expected to be able to know, understand or do;*
- 2. Providing learning activities which will help the student to reach these outcomes;*
- 3. Assessing the extent to which the student meets these outcomes through the use of explicit assessment criteria"* (Centre for the Advancement of Teaching and Learning, UWA, 2009).

OBE is directed at improving student achievement and focuses, therefore, on formative assessment. Tensions arise when the approach is adopted for purposes of external accountability with its focus on summative assessment. As the OECD has noted, from the perspective of tertiary education systems as a whole, both the purposes of accountability and improvement are essential; "the difficulty lies in combining them in the design of a quality assurance framework and its implementation" (Santiago et al., 2008). A starting point in reconciling the dual purposes is to recognise that learning outcomes are more than test scores, and that the choice of proxy measures matter:

"Accountability must be inferred from observing outcomes in any system where all actions cannot be observed directly. To do this 'inferencing' the performance measure is an indicator of the desired behavior, not the behavior itself. In business, there is a clear outcome measure (revenue or stock price) to guide business decisions and actions. You can't manage a business if you can't measure its outcome. In education, outcomes are many and debated. The outcome indicator—most often a multiple-choice achievement test, is but a proxy for the desired outcome. When this indicator becomes an end in itself, and it does in education, well-intentioned accountability may very well distort the system it was intended to improve" (Shavelson, 2009).

Thus one can only find empty the approach of Nusche (2008) and Woodhouse & Stella (2009) in seeking to gauge the effectiveness of education only by reference to summative measures.

4.3.2 Quality, quality assurance, quality enhancement and quality evaluation

Quality is a subjective view of the properties that distinguish an object. Harvey & Green (1993) identified five sets of meanings attaching to quality in higher education (see Box 36). Of particular note is that the fitness-for-purpose criterion turns from a demand-side customer requirement to a supply-side provider mission. The key inference is that mission-related criteria for quality remain powerful in a student demand driven system. This point contrasts with the ill-considered view that fitness for purpose is a less relevant criterion in a diverse student driven system.

...mission-related criteria for quality remain powerful in a student demand driven system.

Box 36. Definitions of quality in higher education

"The *exceptional* view [of quality] sees quality as something special. Traditionally, quality refers to something distinctive and élitist, and, in educational terms is linked to notions of excellence, of 'high quality' unattainable by most.

Quality as *perfection* sees quality as a consistent or flawless outcome. In a sense it 'democratises' the notion of quality and if consistency can be achieved then quality can be attained by all.

Quality as *fitness for purpose* sees quality in terms of fulfilling a customer's requirements, needs or desires. Theoretically, the customer specifies requirements. In education, fitness for purpose is usually based on the ability of an institution to fulfil its mission or a programme of study to fulfil its aims.

Quality as *value for money* sees quality in terms of return on investment. If the same outcome can be achieved at a lower cost, or a better outcome can be achieved at the same cost, then the 'customer' has a quality product or service. The growing tendency for governments to require accountability from higher education reflects a value-for-money approach. Increasingly students require value-for-money for the increasing cost to them of higher education.

Quality as *transformation* is a classic notion of quality that sees it in terms of change from one state to another. In educational terms, transformation refers to the enhancement and empowerment of students or the development of new knowledge."

Harvey, 1995.

The following definitions of academic quality, quality assurance in higher education, and quality enhancement, are taken from the UK's Quality Assurance Agency for Higher Education (QAA, 2006):

Academic quality

Academic quality is a way of describing how well the learning opportunities available to students help them to achieve their award. It is about making sure that appropriate and effective teaching, support, assessment and learning opportunities are provided for them.

Quality assurance (QA)

Quality assurance refers to a range of review procedures designed to safeguard academic standards and promote learning opportunities for students of acceptable quality.

There are various interpretations of what exactly constitutes acceptable quality: e.g., an institution's provision should be "fit for purpose"; should make effective use of resources; should offer its stakeholders value for money; etc...but it is increasingly agreed that it is important to promote improvement of quality, not just to ensure that quality is maintained. This shifts the emphasis from quality assurance to quality enhancement.

Quality enhancement (QE)

Quality enhancement is taking deliberate steps to bring about continual improvement in the effectiveness of the learning experience of students.

These are useful working definitions, and the policy intention to emphasise enhancement is compelling.

Educational quality evaluation

A rounded approach to the evaluation of higher education quality has been advanced by Scott (2008) in a research and analysis brief prepared for the 2008 review of Australian higher education (Scott, 2008). He defines quality with reference to judgements which can be made about the design, support, delivery, and impact of a program. Judgements of quality can be about:

1. the relevance and desirability (fitness-of-purpose), feasibility, and fitness-for-purpose of a learning program's design;
2. the support and infrastructure put in place to enable its delivery;
3. the implementation of the program, e.g. evidence that the planned course and its support systems are being put into practice in the way intended and to the satisfaction of both the students and teaching staff involved;
4. the impact of the program, e.g. evidence of high quality performance on valid, reliably marked assessment items; positive performance on proxy measures of impact including employability, graduate salaries, employer satisfaction with graduates, successful further study, etc.

Scott's approach generates the range of information necessary for making balanced judgements. It locates 'impact' (effectiveness and benefit) in the context of program purpose. It contrasts with the view that impact can be meaningfully assessed without reference to the purpose and context of learning.

4.3.3 Qualifications and Qualifications Frameworks

Qualification

A broad descriptive definition of a qualification is offered by the OECD:

"A qualification is achieved when a competent body determines that an individual has learned knowledge, skills and/or wider competences to specified standards. The standard of learning is confirmed by means of an assessment process or the successful completion of a course of study. Learning and assessment for a qualification can take place during a programme of study and/or workplace experience. A qualification confers official recognition of value in the labour market and in further education and training. A qualification can be a legal entitlement to practise a trade" (OECD, 2007).

A narrower description is offered by Tuck (2007):

"A qualification is a package of standards or units judged to be worthy of formal recognition in a certificate":

'Standards' in this context = "a set of information about outcomes of learning against which learners' performance can be judged in an assessment process".

'Units' in this context = "A coherent set of standards which form a short, unified program of learning".

A deeper understanding of the role of qualifications is indicated by Keating (2008):

"Qualifications have been designed to discriminate. They concentrate upon individuals and they testify to knowledge, skills, attributes and experiences that are not shared by all. They do have social attributes. However, the collective attributes are essentially communal where qualifications play the role of gatekeeper for entry into occupations or alumni".

Qualifications thereby function as passports for learner mobility in labour markets and contexts for further learning.

Qualifications Framework

Considerable diversity in qualifications frameworks is reflected in the OECD's definition. It allows for a range of practices, and does not suggest that one form of practice is better or worse than another:

"An instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved. This set of criteria may be implicit in the qualifications descriptors themselves or made explicit in the form of a set of level descriptors. The scope of frameworks may be

comprehensive of all learning achievement and pathways, or may be confined to a particular sector, for example initial education, adult education and training or an occupational area. Some frameworks may have more design elements and a tighter structure than others; some may have a legal basis whereas others represent a consensus of views of social partners. All qualifications frameworks, however, establish a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country and internationally” (OECD, 2006).

This matter is discussed at 4.4 below.

4.3.4 Standards

Of the thirty or so dictionary meanings of a ‘standard’, the following may be pertinent to the current discussion: anything taken by general consent as a basis of comparison; serving as a basis of value, comparison or judgement; an approved model for imitation; a measure to which others conform or by which the accuracy or quality of others is judged; a grade or level of achievement; a level of quality which is regarded as normal, adequate or acceptable; degree of excellence required for a particular purpose; a document specifying (inter)nationally agreed properties for manufactured goods etc.

Thus ‘standard’ can connote ‘normal’ (i.e. undistinguished), ‘acceptable’ (i.e. fit for purpose), ‘model’ (i.e. worthy of imitation) or, more neutrally, an agreed set of properties to be used for making comparisons. In its neutral sense, a standard is a criterion, and a set of standards comprise criteria or benchmarks for making comparative judgements, such as in assessing performance. Higher education standards, then, can be defined simply as ‘criteria for the assessment of capacity and performance’. However, much depends on who sets the standards, the criteria they select and the levels at which they set them (e.g. whether they are ‘minimum acceptable standards’ or ‘threshold standards, or ‘typical standards’ or ‘high standards’ or ‘aspirational standards’). Standards setting is contested ground, and the most contested area is that of academic standards.

...‘standard’ can connote ‘normal’ (i.e. undistinguished), ‘acceptable’ (i.e. fit for purpose), ‘model’ (i.e. worthy of imitation) or, more neutrally, an agreed set of properties to be used for making comparisons.

Academic standards can include curriculum standards, learning resource standards, pedagogical standards, assessment standards, and achievement standards. These different standards need to be integrated within an institutional context and purpose. If they are treated separately they can conflict:

“It needs to be acknowledged that there is an important tension between pedagogical standards and achievement standards. The highest standards of pedagogy hold that the level of expected student academic achievement should be matched to the background and current level of knowledge of the particular students. Expecting an inappropriately high level of academic achievement for a group of students would not be regarded as good teaching practice and would not be judged as meeting a high standard of pedagogy. Thus, if one focused not on student academic achievement but on teaching as the focus of academic standards one would make very different assessment of academic quality” (Dearn, 2009).

In Britain, the focus of higher education quality assurance is on standards of student achievement (learning): “Academic standards are a way of describing the level of achievement that a student has to reach to gain an academic award (for example, a degree)” (QAA, 2006). Key questions, which are under present debate, include: who should set them, in what contexts, at what levels, and to what extent should they be common?

According to one view, standards are purpose-related, and can only be meaningfully set with reference to the nature and purpose of educational provision: standards are “criteria established by an educational institution to determine levels of student achievement” (education.com). This view reflects the necessary integration of student achievement standards and pedagogical standards at the institutional or program level (Dearn, 2009).

According to another view, academic achievement standards are necessarily based in disciplinary contexts and are essentially dynamic, and while they may be set externally to an educational institution they can only be determined by academic communities:

“We use ‘standards’ to refer to the nature and levels of learning outcomes that students are expected to demonstrate in their university studies. This places the onus for setting and monitoring standards squarely with academics and academic communities within fields of study and disciplines. Standards are neither absolute nor timeless; standards are continually being re-defined and created as knowledge grows in existing fields and as new fields emerge” (James, McInnis & Devlin, 2002).

Van Damme (2003) even goes so far as to suggest that there can be no fixed standards, since quality depends on its relationship to the internal purposes of a program or the external expectations of consumers and stakeholders (cited in Hämäläinen, 2003).

Yet another view sees academic achievement standards as fixed, once they have been pre-set by academics and other stakeholders:

*“An **academic achievement standard** is:*

- an agreed specification or other criterion,*
- used as a rule, guideline or definition,*
- of a level of performance or achievement.*

This definition has two key features. First, a standard refers to a level that is preset and fixed. After that, it remains stable under use unless there are good reasons for resetting it. In higher education this would mean that the standards are not reset for each cohort of students, or for each assessment task. An academic standard is therefore a big-picture concept that stands somewhat apart from particular assessment tasks and student responses. Second, agreement on the specification must be by authority, custom, or consensus, as standards are not private matters dependent on individuals but collegial understandings shared among academics and other stakeholders” (Woodhouse & Stella, 2009).

Are these different views reconcilable? Pre-set and ‘fixed’ standards may be applicable in relation to learning generic skills, which as discussed above, are regarded as being knowledge and context independent. They can be seen to be fixed in that they express criteria that need to be satisfied by an individual learner in order to ‘pass’ a course, irrespective of the performance of other students in a class at a particular time.

***...it is not the officials
but the athletes who
achieve the heights of
performance and set the
standards of excellence.***

The concept of ‘standard’ as a pre-determined and fixed basis against which the capacity and performance of institutions, programs or graduates can be judged is useful in appreciating the difference between vernacular claims to ‘slippage in standards’ and demonstrable differences between institutional or individual performances with reference to set standards. But it is a complacent view. Performance may slip from time to time, relative to standards set previously, but new standards can be set by superior performance. To use a sports analogy—high-jumping—a standard will fall only if an official deliberately lowers the bar for some reason. Normally competitor performances keep the bar rising. Importantly, it is not the officials but the athletes who achieve the heights of performance and set the standards of excellence.

A standard set as the basis for a national higher education system can be only the minimal acceptable quality permitted; it is the provider qualifying criterion, the foundation on which institutions can perform at the higher standards they set for themselves. The adjectives 'same' and 'common' can be applied validly with regard to this pre-set and fixed standard because it is prescribed for all as a minimum. An institution cannot be licensed if it cannot meet the prescribed conditions and continue to perform at least at the defined level of acceptability.

However, performance above the pre-set standard is not expected to be the same for all, because some will excel more than others (have a higher degree of quality) and in different ways for different purposes (exhibit different quality characteristics). In the case of individuals, as well as having different prior attainment and background circumstances, students have different purposes, some keen to pursue a special interests, some curious to taste the unfamiliar, some "developmental" and others "instrumental" in their orientation to learning (Brown, 2007). In the case of institutions, as well as having differences in physical and other circumstances, and differences in talent, universities (as one category of institutional types within which there is much diversity) have varying missions, some focused primarily on the preparation of graduates for professional employment, others focused more intensively on knowledge breakthroughs, perhaps with an interest in the development of rounded graduates.

For courses leading to entry to professional occupations, there may well be common areas for learning, and even common expectations of graduate capabilities. Similarities may be evident in the curriculum of cognate fields across different institutions. But common and similar coverage does not equate to sameness of provision, as there can be different orientations and methods chosen by different providers.

If we focus on 'standards-based education' as a derivative of criterion-referenced learning ('mastery learning') and assessment, standards can be understood as references which guide curriculum objectives, the design and organisation of learning experiences, and related forms of assessment. Standards-based education (see Box 37) is an outcome of the failed 'outcomes-based education' approach abandoned in the US in the 1990s and in Australia in the 2000s. It involves clear, measurable standards for all students and usually involves

- the creation of curriculum frameworks which outline specific knowledge or skills which students must acquire,
- an emphasis on criterion-referenced assessments which are aligned to the frameworks, and
- the imposition of some high-stakes tests, such as graduation examinations requiring a high standard of performance to receive a diploma (<http://en.academic.ru>).

Box 37. Standards-based education (SBE) in Colorado

Standards-based education in Colorado is defined as an ongoing teaching/learning cycle that ensures all students learn and can demonstrate proficiency in their district's adopted content standards and associated benchmark concepts and skills. This teaching/learning cycle frequently measures student achievement through a variety of formats and assessments and ensures multiple opportunities for students to learn until they reach a proficient or advanced level of performance. *Regardless of content, course, level, identified outcomes or revisions in standards, this teaching/learning cycle remains constant.*

- A. Standards in all academic disciplines or content areas, along with benchmark information, concepts and skills, are identified and adopted at the district level.
- B. Essential benchmark information, concepts and skills expected for all students are identified and described. (These may also be called essential learnings, learning targets, power standards, objectives or grade-level expectations.)
- C. Essential benchmarks are articulated and aligned within and among grade levels and across the district to ensure there are no gaps or unnecessary overlaps in those expected learnings.

- D. Adopted curricula provide a scope and a sequence of essential benchmarks (sometimes called curriculum objectives or targets) that engage students in learning standards in all content areas.
- E. Curriculum guides (frameworks), maps, pacing guides and other curricular tools are produced at the district level to assist teachers to plan effective instruction that focuses on essential benchmark knowledge, concepts and skills.
- F. Descriptions of proficiency are created to describe the types and levels of performance expected for all essential benchmarks in all content areas and grade levels.
- G. Examples of proficient student work are created and distributed to teachers to provide models of learning and performance expectations for all essential benchmarks.
- H. Adopted or purchased instructional programs and materials are intentionally articulated and aligned with standards-based curricula.
- I. Standards and benchmarks are communicated effectively to students and parents. Students understand and can describe proficient performance for those concepts and skills.

Benson, 2008.

Externally-developed statements of standards can inform institutional decisions about curriculum design, teaching and assessment but they cannot determine them entirely. In criterion-referenced education, standards have to be integrated in the context of learning to fit the needs and abilities of learners. Similarly, the results of collegial discussion in the academy on expectations of learning outcomes in particular disciplines (e.g. Tuning, Subject Benchmark Statements, ALTC Benchmarks for teaching and learning quality assurance), may serve as helpful references for program design but they can be no more than references:

"Collegial processes of debate about academic standards do not necessarily lead to totally common understandings about what the minimum or base expectations are; nor should they. They often quite validly lead to differences which result in innovation and progression for curriculum, assessment and value adding diversity of graduate outcomes" (ATN, 2009).

"Collegial processes of debate about academic standards do not necessarily lead to totally common understandings about what the minimum or base expectations are; nor should they."

On balance, externally-developed standards, beyond the threshold of acceptability for operational licensing, have a limited role, primarily as references against which internal decisions can be made about educational objectives, curriculum design and assessment:

"Quality evaluation should not be exclusively focused on assessing institutions within a standardised and externally defined framework, but should see the capacity of institutions to stand out through innovation and individual and institutional creativity" (Teixeira, 2010).

So what is meant by "outcomes and standards-based arrangements" (Bradley et al., 2008) in respect of higher education in Australia?

A working model of standards-based arrangements can be found in relation to the National Code relating to the provision of education services for international students. Providers must be registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) as a condition of their students being able to get a visa to study in Australia. CRICOS-registered providers must comply with 15 standards that ensure their quality of education and professionalism is of a sufficiently high standard to enrol international students. These education providers must demonstrate their compliance with the standards at the point of CRICOS registration and throughout their CRICOS registration period.

Each Standard in Part D is linked to the National Code 2007 Explanatory Guide. The 15 standards cover the following aspects of delivery of education to international students:

Standard 1	Marketing Information and Practices
Standard 2	Student Engagement Before Enrolment
Standard 3	Formalisation of Enrolment
Standard 4	Education Agents
Standard 5	Younger Overseas Students
Standard 6	Student Support Services
Standard 7	Transfer Between Registered Providers
Standard 8	Complaints and Appeals
Standard 9	Completion Within Expected Duration
Standard 10	Monitoring Course Progress
Standard 11	Monitoring Attendance
Standard 12	Course Credit
Standard 13	Deferment, Suspension or Cancellation of Study During Enrolment
Standard 14	Staff Capability, Educational Resources and Premises
Standard 15	Changes to Registered Providers' Ownership or Management

By way of illustration, Standard 14 ensures providers have suitable staff, educational resources and premises to educate overseas students. The provision of staff and services are to accord with existing quality assurance frameworks that apply to the course or, where none exist, providers must have appropriate policies and procedures of their own.

Key requirements

- The staff of registered providers are suitably qualified or experienced in relation to the functions they perform for students.
- The educational resources of registered providers support the appropriate delivery of courses to students.
- The suitability of staffing, educational resources and provider premises will be determined in accordance with applicable quality assurance frameworks.
- If no quality framework applies to staffing resources, providers must have, and use, documented policies and processes for: recruitment, induction, performance assessment and ongoing development of staff who recruit or work with overseas students.
- If no quality framework applies to education resources, providers must have adequate resources to deliver the registered course to the students enrolled.
- The provider must notify the designated authority and enrolled students of any intention to relocate premises at least 20 working days before the relocation.

The heavy use of qualifiers such as “sufficient”, “appropriate”, “reasonably available” in the statement of standards renders the process vulnerable to inconsistent judgements and reduces procedural fairness.

■ Is the National Code model what we can expect from TEQSA?

As noted above (see 3.5.2), the Australian Government’s “Higher Education Standards Framework” comprises “provider registration standards”, “provider category standards”, “qualifications standards”, “information standards”, “teaching and learning standards” and “research standards”.

Provider registration standards can be expected to take the form of a document specifying properties that a provider must be able to demonstrate as a condition of obtaining a license to operate. The first draft of provider registration standards in 2009 specified 89 requirements under 9 categories (see Box 38). A problem with the draft, apart from its excessive requirements and the extensive reporting they demand, is that whereas some requirements are readily observable, many of them require interpretation, e.g. under 'management': "the provider maintains an internal culture of respect and trust, including respect for all employees, for students, for Indigenous Australians, for multiculturalism and pluralism and for learning". In what sense is that a standard? Whatever it is it is plainly inoperable, not least because a provider cannot know what it takes to comply. The heavy use of qualifiers such as "sufficient", "appropriate", "reasonably available" in the statement of standards renders the process vulnerable to inconsistent judgements and reduces procedural fairness.

Box 38. First Draft Higher Education Provider Registration Standards and Requirements

1. **Legal status and standing:** The higher education [provider is reputable and is legally accountable for the higher education it offers.
2. **Financial viability and safeguards:** The provider has sufficient financial resources and financial management capacity to sustain the operation of the provider's higher education awards at an acceptable standard of quality, including the provider's awards offered through partnerships with other institutions within Australia or overseas.
3. **Primacy of academic quality and integrity:** The provider maintains academic quality and integrity.
4. **Governance:** The provider is well-governed in respect of its higher education activities.
5. **Management:** The provider is well-managed in respect of its higher education activities.
6. **Responsibilities to students:** The provider defines and meets its responsibilities to students, including the provision of information, support and equitable treatment.
7. **Human resources and professional development:** The provider engages and retains sufficient appropriately qualified and skilled personnel to ensure effective student learning and ensures its personnel are able to professionally develop their skills and knowledge.
8. **Physical resources and infrastructure:** The provider makes available sufficient physical and electronic resources and infrastructure to ensure the achievement of its higher education activities, including achievement by students of expected learning outcomes.
9. **Standards for programs:** The provider maintains appropriate academic standards in its higher education programs.

Source: DEEWR, 2010.

There are two projects being funded by the ALTC relating to teaching and learning standards. One is the 'Benchmarks for teaching and learning quality assurance' exercise discussed at 3.5.5 above. The other is the 'Teaching Standards Framework', outlined at 3.5.6 above, the design of which is based on a template developed by Macquarie University.

Macquarie University/ALTC Teaching Standards Framework project

Macquarie University has developed a teaching standards framework based on the view that "effective learning requires teaching built on:

- A university culture that is focused on enhancing the quality of student learning in professional, intellectual, social and ethical terms;

- Universities that are socially dynamic and student-centred (in both administration and teaching), with policies and practices that enhance their social inclusiveness and enrich university study as a total human experience;
- Governance that is transparent, accountable and responsive to student, community and government priorities;
- Policies and practices which facilitate excellence in learning and teaching outcomes through clear academic planning, explicit appointment criteria and career development practices;
- Appropriate resourcing;
- Teachers who are familiar with the latest developments in their disciplines; establish clear learning and teaching strategies and outcomes; are familiar with innovative thinking on learning and teaching, and are accessible and responsive to students, colleagues and the community” (Macquarie University, 2010a).

Macquarie defines teaching standards as “the criteria by which we assess the quality of learning and teaching performance and outcomes” (Macquarie University, 2010b). Its institutional level teaching standards framework considers ‘culture’, ‘governance’ and ‘practices’ along levels of achievement in relation to the criteria:

“In general terms, ‘No’ indicates a failure to address the criterion; at ‘No But’ there is some manifest acknowledgement of the criterion and some intention of meeting it, but so far there has been no substantial progress towards that goal; at ‘Yes, But’, there has been an active attempt to meet the criterion, but without significant innovation or initiative; at ‘Yes’, institutions will be actively re-thinking what they do in light of the criterion, and innovating accordingly. There is provision to exceed ‘Yes’, where an institution will be pioneering new methods of learning and teaching that will contribute to a re-definition of the criterion” (Macquarie University, 2010b).

By way of illustration under ‘practices’, in relation to the criterion “University funding models recognise and reward good teaching”, the following levels are described for self assessment purposes:

‘No’	Funding models do not recognise teaching excellence.
‘No, But’	Funding models recognise the importance of teaching excellence but do not provide adequate funding due to competing priorities
‘Yes, But’	The University allocates resources to support teaching excellence through its funding models, but they are targeted narrowly due to competing priorities
‘Yes’	The University funding model allocates appropriate resources to support teaching excellence across the institution.

■ *Why should Macquarie’s template be replicated across other universities?*

While it may be useful for performance improvement purposes for individual institutions voluntarily to benchmark their policies and practices, it is not self-evident that such an approach should be part of a national standards framework and as part of a regulatory mechanism. Indeed, standard practices in this area are inappropriate, as each institution should gear its teaching strategies to meet its particular objectives in relation to its students. Hence, it is curious that the project is being funded for the purpose of developing a framework which “would then be validated as a tool which could be used by government agencies such as TEQSA and for inter-institutional benchmarking” (Macquarie University, 2010a).

The ATN Academic Indicators

Another guide to the possible evolution of “standards-based arrangements” for academic quality assurance is the suite of indicators being developed by the Australian Technology Network (ATN) group of (formerly capital-city polytechnics) universities. The ATN commissioned ACER (a major vendor of

testing instruments) to develop a draft set of 'academic standards', and the ensuing report offered a model which might "further distinguish ATN institutions as a consolidated network, and provide a foundation for network-wide and evidence-based planning, practice and review" (Coates, 2007a). The initiative is of some note because of the explicit reference to it in the Bradley report (Bradley being of the ATN stable), with the enjoinder that the ATN model should be replicated:

"Work is already under way in the sector to start articulating academic standards in a more sophisticated way. For example, the Australian Technology Network group of universities has commenced a project on academic standards which could be used to benchmark across institutions. While this is an important initiative, what is needed is more rapid and systematic implementation of a coherent national framework that applies to all higher education providers" (Bradley et al., 2008).

The clear inference is that something along the lines of the ATN academic standards framework ought to be applied universally across the Australian higher education sector, and quickly.

The clear inference is that something along the lines of the ATN academic standards framework ought to be applied universally across the Australian higher education sector, and quickly. But why? And why the rush? And why model the Australian higher education sector on the aspirations of the ATN?

It is one thing for a group of institutions to seek to differentiate themselves through a particular model of reporting on their capacity and performance, but it is quite another thing, indeed self-defeating as well as ingratiating, to impose that group's model on everyone else. Importantly, the proposed approach reflects a lack of regard for diversity and a complete lack of understanding of what drives innovation and quality in higher education. The Go8, for instance, would not wish to be limited by the horizons of the ATN. The Teaching and Learning Academic Standards Framework for the University of South Australia is at **Attachment C**. Is this indicative of the operational model to be imposed on all institutions? Why should it be assumed that its particular approach has merit? Or does it reflect the notion of a standard as merely 'acceptably normal'? Indeed its blunt approach to knowledge is well short of cutting edge. In Go8 universities, academic staff are appraised against disciplinary leaders internationally, and learning is informed by discovery well in advance of what appears in textbooks. But the University of South Australia is apparently satisfied with a much lower standard:

"The University encourages academic staff to contribute to their discipline and be in touch with current research and scholarship, integrating into their teaching the knowledge and understanding they and others create through scholarly activity, including the creation of text books and other teaching resources" (University of South Australia, 2009).

In any event, the ATN model is a long way from being operational, as indicated in the recommendations of the commissioned report (Coates, 2007a):

1. ATN institutions should adopt a consistent definition of 'academic standards as being 'levels of performance on key academic indicators of educational quality'.
2. ATN institutions should endorse the proposed ATN Academic Standards Model, which consists of a high-level indicator framework, a suite of measures to support these indicators, an approach for gathering data on each of these measures and a series of standards for identifying performance.
3. ATN institutions should produce a succinct plain language summary that provides information to relevant stakeholder groups on the specification, measurement, monitoring and enhancement of academic standards. This could be prepared by individual institutions, or across the ATN as a whole.

4. ATN institutions should implement the ATN academic Standards model. This would involve operationalising the model, mapping data elements against defined measures and indicators, managing and analysing data, developing performance measures and reports, and establishing routines for benchmarking and improvement.
5. ATN institutions should develop their capacity to measure and hence assure general graduate capabilities including work readiness. To provide a foundation, a comparable set of graduate capabilities should be defined and embedded into learning and teaching. Assessments should be developed to measure graduates' capability, which may include routine assessments, feedback from employers, or an objective test.
6. ATN institutions should undertake a systematic and multifaceted review of student assessment and reporting. Such a review could develop ATN capacity to: monitor student input standards, produce validated assessment tasks, develop moderation processes to ensure the equivalence of learning standards, develop comparable curriculum standards, develop common reporting metrics, develop transparent statements of attainment and conduct routine analyses of student performance data.
7. ATN institutions should develop a systematic approach to monitoring and enhancing industry involvement in learning. Institutions might: highlight the important role that employers, industries and working professionals play in ensuring the quality of higher education; enhance the formative input provided by industry into educational design, delivery, assessment and review; strengthen or build relationships with professional bodies; and obtain more systematic forms of feedback from graduate employers.
8. ATN institutions should further develop their approach to documenting and developing educational resources. They should design and implement a systematic approach to the production of teaching portfolios and initiate the development of course portfolios.

Of particular note is the set of actions at recommendation 6 above, including equivalent learning standards, comparable curriculum standards and common reporting metrics. It is one thing for a group of five like-minded institutions to develop comparable approaches but quite another to require all institutions to comply with a single model.

Indeed it is inconceivable that a government in a contemporary democracy would contemplate such a latter-day Stalinist model. The ATN Academic Standards Model involves sets of measures to support three types of performance indicators: outcomes (see Box 39); process and context (see Box 40); and inputs (see Box 41). The development of data for comparable reporting and benchmarking on these measures can be seen as a significant improvement agenda for the ATN. But what has this to do with the role of a national regulator? As noted at 2.5.3 above, wide adoption of common templates tends to replicate sameness and reduce diversity.

It is one thing for a group of five like-minded institutions to develop comparable approaches but quite another to require all institutions to comply with a single model.

Box 39. Measures to support outcome indicators

Level	Indicator	Measures	
Student	Graduation	Completion rates	Time to completion
	Graduate destinations	Labour-force participation rates	Further study participation rates
	Satisfaction	Graduate satisfaction data Student satisfaction data	Completion rates Student retention rates
	Learning outcomes	Validated assessment results Student engagement data Further study participation rates	Student success rates Numeracy and literacy data
	Graduate qualities	Employer satisfaction data Labour-force participation rates	Graduate attribute assessments Data on generic skills
	Work readiness	Capstone program participation rates	Data on work readiness Data on employability skills
Teacher	Teaching experience	Number of teaching awards Teaching quality data	Teaching staff experience
	Teaching resources	Teaching resource satisfaction data Library satisfaction data	ICT resource satisfaction data Production of teaching resources
Provider	Institutional growth	Number of partnerships and networks	Teaching and learning income
	Institutional reputation	Placement in institutional rankings	Course demand data
		Number of teaching awards International staff exchange rates	International student exchange rates International student numbers
	Community engagement	Size of alumni programs Employer satisfaction data Equity group access and quality data	Data on community engagement programs Service learning participation rates

Box 40. Measures to support process and context indicators

Level	Indicator	Measures	
Student	Student engagement	Student engagement data Completion rates	Retention rates
	Retention and progress	Retention rates Progress rates	Retention programs Learner support services
Teacher	Teaching processes	Teaching quality data Staff/student ratios Staff mentoring programs	Sessional staff support programs Teacher review processes Curriculum management processes Staff development programs
	Course management	Scheduling and timetabling management Industry involvement in course design Course viability and relevance Course development processes	Arrangements for course coordination Course approval processes Staff teaching load
Provider	Academic governance	Education policies	Management policies
	Academic management	Education plans and systems Management plans and systems	Learner support programs Systems for managing student experience
		Staff support services Diversity of academic staff	Education support programs Plagiarism rates
	Staff development	Staff development participation data International staff exchange rates	Teaching development grants Academic staff promotion rates
	Quality systems	Monitoring processes Enhancement activities Examination procedures	Staff mentoring programs Academic appeals processes

Box 41. Measures to support input indicators

Level	Indicator	Measures	
Student	Entry levels	Literacy and numeracy data Academic literacy	Course demand and selectivity
	Entry pathways	Credit transfer arrangements Student selection processes Advanced standing arrangements Extent of financial supports	Demand from qualified regional students Diversity of entrance pathways Transfer and articulation arrangements
	Student diversity	Incoming student characteristics Number of exchange students International student numbers	Equity group access and participation Student exchange supports
Teacher	Staff characteristics	Academic staff in senior positions Staff teaching qualifications Academic staff with doctorates Staff international experience	Academic/administrative staff ratios Sessional teaching staff numbers Teaching staff experience
	University enculturation	University enculturation programs	Retention programs
	Educational resources	Teaching resources Teaching development grants	Library resources and services Learning innovation programs
	Course development	Financial status of courses Course accreditation processes Course development processes Course approval processes Course coordination arrangements	Curriculum relevance Course review processes Industry involvement in course design Teaching development grants
	Support systems	ICT resources and supports Staff mentoring programs Sessional staff support programs Staff development programs	Equity student support programs Student support services Disability support services Induction programs
Provider	Institutional characteristics	Investment in learning infrastructure	Community outreach programs Institutional ranking
	Institutional reputation	Course demand and selectivity Presentation at conferences International student numbers	Alumni programs Partnership and network arrangements Institutional rankings
	Institutional resources	Learning infrastructure Partnerships and networks Educational development programs Teaching staff experience	Library resources and services Teaching and learning income Teaching development grants
	Industry engagement	Course accreditation processes Course relevance Service learning programs Industry involvement in course design	Alumni programs Labour-force participation rates Course-integrated careers advice Industry partnerships and networks

4.3.5 Comparability or consistency?

There are now very wide differences in the input factors to higher education, including students and teachers whose interactions are the critical determinants of learning, and it would be unreasonable to expect flattening of those differences in the characteristics of graduates.

“Any agreement to have a uniform system-wide set of standards for student academic achievement raises the issue of whose standards. It is unlikely that any institution would wish to lower its standards of student academic achievement which immediately raises the issue of the implications of imposing the same unrealistically high levels of academic achievement on all students in the sector in terms of equity and social inclusion” (Dearn, 2009).

The greater diversity of the student mix, provider types and modes of teaching and learning requires more sophistication rather than more simplicity in the representation of the characteristics and contributions of higher education:

"At a time when only a very small proportion of the population went to university, and the student population was broadly equivalent in terms of background and ability—and when degree courses were considerably more uniform in terms of their nature and intended outcomes than they are now—it was undoubtedly a reasonable expectation that the outcomes of degree courses should be broadly comparable, and that there should be mechanisms available to police this (hence, external examiners). Today, the environment is radically different. Nearly half of the young population now participate in higher education, the range of ability of those students is very wide, and the purpose, nature and intended outcomes of programmes all vary considerably. It makes little

"It makes little sense to seek comparability of outcomes, and indeed it would actually be wrong to do so."

sense to seek comparability of outcomes, and indeed it would actually be wrong to do so. Given the extraordinarily high previous educational attainment of students attending, say, Oxford or Cambridge, the substantially greater resources devoted to them, the greater intensity of study that they undergo, and other factors, it would in fact be a surprise if the outcomes of students from those universities were no higher than those of students from other universities who have far lower prior attainment, resources devoted to them, and so on. But, self-evident as this might seem, there are actually no instruments available to demonstrate it." (Brown, 2010a).

As noted at 3.2 above, the question of comparability or consistency of degree standards has been raised in Britain through the House of Commons, motivated primarily by a desire to remove discrimination against graduates of less prestigious institutions and to inform students of the worth of their degrees. A similar debate is in progress in the US (see Box 42), inspired by similar concerns and a need to improve the information available to employers.

Box 42. Making Degrees Easier to Interpret

"Suppose an employer advertises an entry-level position that requires advanced statistical knowledge. The employer narrows down the applicant pool to three finalists for the position: an Ivy League graduate, a graduate from a small public college, and a graduate from a for-profit university. All the candidates have bachelor's degrees in statistics and all have roughly the same GPA's, previous work experiences, and pleasant demeanors.

How can the employer possibly distinguish the values of the three finalists' degrees? There is essentially no method to determine which of the three graduates have the knowledge and skills that match the advertised position. Grades and academic standards often vary so much by institution, department, and instructor that transcripts are written off as arbitrary and meaningless by those making hiring decisions. Outside fields with licensure exams like accounting and nursing, employers often hire workers based on connections, intuition, and the sometimes-misleading reputations of applicants' alma maters. This system doesn't allow labor markets to function efficiently. And it's far from meritocratic for college graduates, especially the talented ones who attended less-selective schools and are disproportionately likely to be first-generation, low-income, or students of color.

To rectify this broken hiring system, academia and industry should form stronger partnerships to better determine which skills and knowledge students in various fields need to master. Some types of common and field-based assessments are needed to help employers match their jobs to graduates with complementary skills, even if the assessments are entirely voluntary for students. The traditional college transcript is simply too impenetrable for anyone outside—or inside—academia to comprehend."

Hinton, F. (2010).

By what means could qualitative differences in student learning be demonstrated amid great diversity?

It has been suggested that the very quest for consistency in higher education standards is quixotic and fails to appreciate the diversity and dynamism of the field. A more customised approach is seen to be appropriate, where a higher education institution puts forward the objectives, learning opportunities and assessment strategies for its programs, reflecting its mission and validated by the relevant field and professional communities (see Box 43). One option for implementing a more customised approach is to develop the 'diploma supplement' as a fuller record of the learning experiences of students.

One option for implementing a more customised approach is to develop the 'diploma supplement' as a fuller record of the learning experiences of students.

Box 43. Comparability and consistency in British Higher Education

"There is no mechanism to ensure consistent and meaningful comparability among institutions and subjects, and no mechanism I can envisage that could make it so. National examinations, which some have suggested, or individual degree standards overseen by a body such as QAA, would create a vast industry and an attendant bureaucracy and its inevitable failure would make the annual row over GCSEs and A Levels look very tame indeed. It would be much simpler to stop using these out of date classifications designed to meet the needs of another century, and provide individually focused information which actually tells the user something about the student and what he or she has learned. The 'one size fits all' scheme we now use is a travesty of fairness and consistency.

We seem in this country to have no capacity to think beyond monolithic hierarchies and, in trying to shoehorn very different purposes, clienteles, structures and people into a single narrow boot marked 'The only acceptable HE standards for the UK', we perhaps reduce our opportunities to innovate, develop and recognise a much more useful set of standards based on the particular characteristics of the students and programmes being offered.

Provided the standards are clearly stated and readily available, validated by the relevant subject and professional community as useful, valuable and appropriate, and form the basis for the assessment of students, then the variations between subjects and institutions should become a reason for celebration, not the sort of angst about irreconcilable differences."

Williams, P. (2010).

Even the search for threshold standards is seen to be a formidable challenge in a sector which continues to diversify:

"I'd like to refer to what I've called Brown's Paradox (but I don't claim originality for it) which is that, as the system expands, the pressures of comparability increase but, by the same token, the ability to ensure it reduces. Indeed the major changes that have taken place over the last decade have produced an incredibly heterogeneous sector with far more types and structure of degree than in the past. And this looks set to continue. They make such threshold standards increasingly impossible to implement, at the same time as creating a situation which makes their absence felt, and I think that is the nub of the problem" (Brown, 2010b)

Similarly, in the US there is a troubled view about the penchant of governments to seek simple comparisons of higher education outcomes based on scores on standardised tests, and the damage that approach can do to diversity:

"Using common measures and standards to compare institutions that serve markedly different student populations (e.g., a highly selective, residential liberal arts college compared to an open-access

community college with predominantly part-time students, or a comprehensive public university serving a heterogeneous mix of students) results in lowered expectations for some types of institutions and unreasonable demands for others. If similar measures are used but “acceptable standards” are allowed to vary, an inherent message is conveyed that one type of mission is inherently superior to the other. The diversity of the US higher education landscape is often cited as one of its key strengths. Homogenous approaches to quality assessment and accountability work against that strength and create perverse incentives that undermine important societal goals” (Borden, 2010).

The challenge of comparability is complicated by the range of expectations for it, and the associated confusion of policy intent:

“Comparability means that the standards of learning aimed at and achieved by students in any two programmes leading to the same or a cognate award are genuinely equivalent. So it could mean, for example, that all students in one institution obtaining a bachelors degree in any subject are achieving the same standard, all students from several institutions obtaining a bachelors degree in any subject are achieving the same standard, and it could mean all students from several institutions obtaining a bachelors degree in the same subject are achieving the same standard. It could also refer to common standards in all elements of a programme, options as well as core, and it could mean common standards over time in different cohorts of a programme” (Brown, 2010a).

In principle, consistency of degree standards would require commonality in each of following conditions:

- within all the components of a degree program (including options) within an institution;
- in the degree program followed over several years;
- in the standards aimed at and achieved in similar programs in the same subject in different institutions;
- in the standards aimed at and achieved in different subjects both within an institution and across the sector (Brown, 2010a).

To provide valid and reliable information about the comparative quality of programs and awards it would be necessary that:

- the programs would have to be comparable in terms of aims, structure, content, learning outcomes, delivery and support;
- similarly, the awards would have to involve comparable assessment methods, criteria and outcomes (marks or grades);
- the assessment judgements would have to be valid, reliable and consistent; and
- students pursuing the programs (and/or interested in pursuing the programs) would have to have comparable starting attainments, aspirations, motivations and learning objectives (Brown, 2007).

“I believe that any real comparability now is infeasible, at least without a national curriculum and national examiners answerable to a national standards agency.”

These conditions are neither likely nor desirable in a diverse and responsive system. Not only is the feasibility of consistency (‘strong comparability’ in British usage) dependent on a Napoleonic approach, of a national curriculum delivered regimentally, but it could also produce perverse outcomes:

“...is strong comparability really desirable? Should a demonstrable persistently significant lack of comparability mean some exam boards, departments or even possibly institutions giving larger numbers of highly rated awards and others fewer? Would some courses have to teach less or to a

lower standard and vice versa? Should there be changes in resourcing levels and policies in ambitions, criteria, etc? A combination of some or all of these might put certain programmes, departments or even, dare I say, institutions, out of business. Who would decide these things assuming we were to get that far? I believe that any real comparability now is infeasible, at least without a national curriculum and national examiners answerable to a national standards agency” (Brown, 2010b).

Curiously, in the British context, ‘comparability’ has come to have the peculiar meaning of ‘same’, ‘common’, ‘consistent’ and ‘equivalent’. Additionally, the terms are applied interchangeably to standards and performance. Such confusing use of terms is unhelpful for international discourse. It would better to distinguish between key terms, and to be clear about the policy purposes attached to each. Various definitions of the concepts being used in policy discussions, including for ‘learning outcomes’, have been explored. A set of working definitions for the wandering adjectives is offered in Box 44, with the underlined phrase being the preferred meaning for each adjective.

Box 44. Working definitions of key qualifiers

Same	<u>identical</u> ; uniform; unvarying;
Common	typical; occurring often; <u>shared by many</u> ; of the most familiar type;
Similar	<u>alike</u> ; resembling the same kind ;
Equivalent	equal in value, or importance or utility; <u>of commensurable worth</u> ;
Consistent	not contradictory; <u>constant to same principles</u> ; compatible;
Comparable	capable of being compared; <u>enabling estimated similarity or dissimilarity</u>

Sources: Australian Oxford and Macquarie dictionaries.

These adjectives may be qualifiers for either standards or performances, but they have very different implications according to what is being qualified. For instance, consistency is not sameness. Rather, it is constant adherence to a set of principles, on the part of a particular higher education provider. Thus, consistency cannot be norm referenced. Equivalence is about social value and recognition, despite difference. Comparable differs from same and common, in that it relates to dissimilarities as well as similarities.

These are not trivial nuances. They go to the heart of appreciating what is worthwhile and what can be demeaned by lack of that appreciation. They expose as vacuous any notion of consistent standards across a national system of higher education.

4.3.6 Fitness for purpose, fitness of purpose, and a standards-based approach

“fitness for purpose” is a definition of quality that allows institutions to define their purpose in their mission and objectives, so “quality” is demonstrated by achieving these. This definition allows variability in institutions, rather than forcing them to be clones of one another” (Woodhouse, 1999).

“Fitness for purpose approaches explicitly acknowledge diverse institutional missions and the differences in what they achieve. Standards-based approaches emphasise what institutions should have in common, especially in terms of the nature and level of learning outcomes that students are expected to demonstrate in their university studies” (James, McInnis & Devlin, 2002).

The concept of quality as fitness for purpose differs from other notions of quality in fundamental ways, for it is based on the premise that if something does the job for which it is designed, then it is a quality product or service. That is, every product or service has the potential to fit its purpose and thus be a quality product or service:

"The ultimate measure of perfection, 'zero defects,' may be excellent as a definition of quality but runs the fatal risk of being perfectly useless. If the product does not fit its purpose then its perfection is irrelevant" (Harvey & Green, 1993).

As one of the five definitions of quality identified by Harvey and Green (1993), fitness for purpose is the most deceptive, "for it raises the issue of whose purpose and how is fitness assessed?" Fitness for purpose offers two alternative priorities for specifying purpose. The first puts the onus on the customer, while the second locates it on the provider:

"Fitness for purpose sees quality as fulfilling a customer's requirements, needs or desires. Theoretically, the customer specifies requirements. In education, fitness for purpose is usually based on the ability of an institution to fulfil its mission or a programme of study to fulfil its aims" (Harvey & Green, 1993).

Harvey & Green elaborate on the extent to which fitness for purpose is customer-specified, in the sense that a customer has requirements that become the specifications for the product, and the outcome meets those requirements:

"Thus a quality product is one that conforms to customer determined specifications.

This approach provides a model for determining what the specification for a quality product or service should be. It is also developmental as it recognises that purposes may change over times thus requiring constant re-evaluation of the appropriateness of the specification" (Harvey & Green, 1993).

However, they note that customer specification is an idealisation, and that in practice, customers rarely specify their individual requirements. In the general production of goods and services in mass markets, providers anticipate and assess what the customer is prepared to buy. In education there is the added complication of multiple customers and consumers who may not know what they want:

...customers rarely specify their individual requirements.

"First, the notion of 'customer' is itself a tricky, indeed contentious, concept in education. Is the customer the service user (the students) or those who pay for the service (the government, the employers, parents)? Second, the customer, the student for example, is not always able, nor necessarily in a position to, specify what is required. Fitness for purpose, therefore, leaves open the question of who should define quality in education and how it should be assessed" (Harvey & Green, 1993).

So with some circularity, 'fitness for purpose' in education moves from being driven by student requirement to being driven by institutional mission. The important corollary is that quality is a function of how well an educational institution fulfils its mission:

"The tricky issue of determining who are the customers of higher education and what their requirements are can be avoided, to some extent, by returning the emphasis to the institution. Quality can be then be defined in terms of the institution fulfilling stated objectives or mission" (Harvey & Green, 1993).

However, there remains another problem. Defining quality only in terms of fitness for purpose has no referent other than what an institution claims to stand for: "a major weakness of the fitness for purpose concept is that it may seem to imply that "anything goes" in higher education so long as a purpose can be formulated for it" (Campbell and Rozsnyai, 2002). This tension can be addressed by locating fitness for purpose in the context of shared understandings (see Box 45). In this understanding of the complexities, fitness for purpose approaches to quality assurance can be complemented by references to external expectations, such as in the form of criteria for employability and indicative standards. The issue, as always, is the balance between similarity and dissimilarity of expectations, and the degree of discretion that providers are allowed in serving different needs as best they can.

Box 45. Fitness for purpose and fitness of purpose

"Among the various criteria used in judging quality, we find the terms 'fitness for purpose' and 'fitness of purpose'. The former, often used in quality assurance activities, means determining whether the academic strategies are suitable for achieving the declared aims of a programme. The latter means determining whether the aims of the programme are suitable or not. In the Tuning view, to develop true quality, 'fitness for purpose' has meaning only when the fitness of purpose itself is thoroughly established and demonstrated. As a consequence Tuning holds that quality in programme design and delivery means guaranteeing both "fitness for purpose" (i.e. suitability for achieving the declared aims of each programme), and "fitness of purpose" (i.e. suitability of the aims of each programme: these should meet the expectations of students, academic staff, employers and the broader ones foreseen in the Bologna Process). Guaranteeing "fitness of purpose" requires a strong connection with research and academic standards as well as a consideration of employability which is only implicit in the "fitness for purpose" definition".

Source: Quality enhancement at programme level: The Tuning approach. Tuning Educational Structures in Europe. <http://www.tuning.unideusto.org/tuningeu/index.php?option=content&task=view&id=176>.

Thus we return yet again to the basic question; whose standards? The major policy issues arising from this question are: Who should set standards for higher education? Should externally-set standards serve as references or guidelines for higher education institutions to use, inter alia, in setting their own standards? Or should the institutions focus on ways and means of meeting the externally-set standards?

It may be argued that external standards leave institutions free to determine the ways and means of achieving desired outcomes. That is, the setting of standards as criteria for the assessment of effectiveness does not necessarily mean standardisation of what is taught and how it is taught, nor does it diminish institutional autonomy in respect of curriculum and pedagogy. However, the setting of academic standards is the fundamental expression of what a university stands for. To take away from a university the function of setting its educational goals is to deprive it of its reason for being. The university has its own standards of excellence to live up to. It also needs to be responsive to the expectations of others. In a plural system the university's own expectations and those of the community it serves may not always align with standards set by a national regulator.

4.4 National Qualifications Frameworks

This section looks at the underpinning principles of national qualifications frameworks (NQFs): their purposes, and the purposes of qualifications; the recognition of knowledge and skills in their structure; and the process of their development.

4.4.1 The role of NQFs

National Qualifications Frameworks (NQFs) are broad and abstract descriptive maps of the structure of qualifications within national education systems designed to enable national level comparisons to be made about the equivalence of different qualifications.

However, two different approaches to the construction of qualification maps may be discerned: one (mainly Euro) prefers a register approach (a descriptive model) of ‘frameworks of communication’; the other (mainly Anglo) is outcomes-based and favours regulatory frameworks (a prescriptive model) (Young, 2007).

A finer distinction may be made between the orientations of qualifications frameworks (Raffe, 2009a):

- a communications framework takes the existing education and training system as its starting point and aims to make it more transparent and easier to understand, typically in order to rationalise it, improve its coherence, to encourage access and to highlight opportunities for transfer and progression between programs.
- a reforming framework takes the existing system as its starting point but aims to improve it in specific ways, for example, by enhancing quality, increasing consistency, filling gaps in provision or increasing accountability. It is typically statutory and has a regulatory role.
- A transformational framework takes a proposed future system as its starting point and defines the qualifications it would like to see in a transformed system, without explicit reference to existing provision. It typically uses learning outcomes for this purpose because they allow qualifications to be specified independently of existing standards, institutions and programs.

The experience of early NQFs (e.g. New Zealand, South Africa) has been that ‘transformational frameworks’ have been the least successful...

The experience of early NQFs (e.g. New Zealand, South Africa) has been that ‘transformational frameworks’ have been the least successful, if success is assessed as those frameworks which “include most of their target qualifications, retain broad-based stakeholder support, avoid major changes in strategy and achieve at least their shorter-term objectives (Raffe, 2009a).

4.4.2 Assumptions about knowledge in NQFs

Young (2003) has identified six main assumptions underpinning the development of NQFs:

- i. it is possible to describe all qualifications in terms of a single set of criteria;
- ii. all qualifications can be ranked on a single hierarchy, and it is possible to develop a single set of levels—each with its distinct level descriptor—which apply equally to all of the types of accredited learning and all qualifications;
- iii. all qualifications can be described and assessed in terms of learning outcomes that are independent of the site, the form of provision and the type of pedagogy and curriculum through which they are achieved;

- iv. all qualifications can, at least in principle, be divided into elements which can (a) be located on levels using the same descriptors and (b) ascribed a volume of learning in terms of notional learning hours (or the equivalent) and therefore assigned a 'credit rating';
- v. such a framework provides a set of benchmarks against which learning can be assessed and accredited;
- vi. such a framework provides the basis of a learner-centred system of qualifications in which only the learner's own performance would inhibit his or her progress.

These assumptions are radical, but perhaps also illusory in "attempting to classify the unclassifiable" (Blackmur, 2004). Many of the key decisions (e.g. how many levels) are arbitrary (Blackmur, 2004). When outcome statements are not linked to the activities that learners have engaged in, they need to be highly specified, and the need for specificity leads to a narrowing of outcomes and a trivialisation of assessment (Young, Allais & Raffe 2009).

As noted earlier, qualifications discriminate among individuals (Keating, 2008) and play a gatekeeper role in legitimating practice in the professions (Menand, 2010). With a focus on the purposes of qualifications, Keating (2008) distinguishes between the two main traditions underpinning 'academic qualifications' on the one hand and 'vocational qualifications' on the other hand, and identifies the emergence of a third. He suggests that "a robust national qualifications system would be one that maximised and achieved an appropriate balance between these purposes" (Keating, 2008).

The mainly "cultural" purposes of academic qualifications, which are closely attached to the institutions that award them, and are "based upon recognised disciplines in their construct" are seen to be "located dually in the passing on and development of the disciplines, and in broader social purpose associated with social structures and interactions, and beliefs and understandings including citizenship" (Keating, 2008).

In contrast, the human capital development purpose of vocational qualifications gives them a different character, in that they are standards-based testifiers to competence:

"Qualifications that meet this purpose have occupational and industry foci and are designed to control occupational entry and standards and to support industry productivity. Typically their currency is in the form of standards-based knowledge and skills. They may or may not be expressed as competencies. The currency is derived from occupational and industrial recognition, trust and use. Recognition can be localised geographically or more widely distributed. A qualification can have a monopoly of this recognition or share it with other qualifications" (Keating, 2008).

Similarly, Muller (2009) distinguishes between "conceptual coherence" and "contextual coherence" in curriculum. The former is the epistemological core of a discipline, with a hierarchy of abstraction and conceptual difficulty, and involves sequential learning, where higher order understandings depend on prerequisite knowledge underpinnings. The latter is "segmentally connected, where each segment is adequate to a context, sufficient to a purpose" (Muller, 2009). Muller explores the relative mix of conceptual and contextual coherence features for different professional fields, and notes that there are differences within as well as between each kind.

Keating (2008) observes a third purpose for qualifications emerging from the lifelong learning agenda. This purpose he sees as requiring "generalist or platform qualities of qualifications as well as linkages between qualifications"

"Qualifications that meet this purpose need to have broad recognition and links with other qualifications at the entry levels and as a bonus through credit. They gain their currency through their platform of general learning or through their capacity to discriminate or create hierarchies, depending upon the nature of and their relationship with their users. There is an obvious tension here" (Keating, 2008).

Additionally, the increasing atomisation of learning through modularised bite-size-bits, and just-in-time units, has provided “a more conducive platform for recognition of learning outside the formal processes that are typically defined by qualifications” (Keating, 2008). Consequently, contemporary designers of qualifications frameworks are having to wrestle with enigmatic relationships. A particular impetus is being given by governments, for economic purposes, and backed by employer groups and unions, to the development of arrangements that focus on the human capital and lifelong learning purposes, typically to the neglect of, or even disdain for, cultural purposes. And when the cultural ingredients of sequential learning in discipline frameworks are poured into the stew of segmented bits they can lose their shape and flavour.

One might argue with Muller’s assumption of tight sequentiality, or with Keating’s distinction between academic and vocational qualifications; learning is not always linear, and many higher education qualifications are, and have long been, vocational in purpose, whether in the fields of theology, medicine, engineering, law or accounting. Moreover, disciplinary cores fracture or even disintegrate periodically (Lazerson, 2010) and also reconstitute themselves over time (Menand, 2010). The important difference is what defines learning. The premise is that qualifications for professional practice obtained in academic environments are different in kind, by virtue of the disciplinary framework for learning and the cultural context of learning, than qualifications obtained in other ways.

A further difference is important; learning in universities, particularly where research is an integral part of the culture, is defined by an understanding of provisional knowledge. University learning is not merely about mastering what is known, but about developing the ability to create intellectual maps for dealing with the unknown and unpredictable, and for discerning falsity.

In the narrow discourse of ‘relevance’ these values and perspectives may be dismissed as unfashionable if not elitist or self-indulgent. However, the massification of higher education in itself does not diminish their importance, even though it may make their advocacy less popular.

Noting that “all qualifications carry value—for the graduates and for the users”, Keating has distinguished between ‘intrinsic’ and ‘exchange’ value (Keating, 2008):

“The intrinsic value is the personal benefit and status that a qualification gives to the learner, the platform and motivation it gives for further learning, and the wider social value of an educated citizenry. The exchange value is realised in the employment market and in access to further formal learning. Both intrinsic and exchange value need to have a base in knowledge” (Keating, 2008).

Keating argues that “qualifications must have relational qualities, and it is the nature of the relational aspects of the knowledge that is central to the intrinsic and the exchange value of the knowledge and the qualification (and) “the relational aspects of qualifications are drawn from their purposes and constructs” (Keating, 2008). Academic qualifications are seen to have a relational quality drawn from the disciplinary structures of knowledge, whereas the relational quality of vocational qualifications is drawn from work practices, and “the value of the recognition is its exchange capacity in the workplace or labour market” (Keating, 2008). From this perspective he argues that NQFs cannot by central mandate fuse fundamental differences in the nature of the knowledge (including skills) that qualifications represent, and the nature of the learning that has led to the knowledge:

University learning is not merely about mastering what is known, but about developing the ability to create intellectual maps for dealing with the unknown and unpredictable, and for discerning falsity.

...NQFs cannot by central mandate fuse fundamental differences in the nature of the knowledge (including skills) that qualifications represent...

"It seems unlikely, if not impossible, that they can be imposed from above. In one sense this is possible through a mix and match of different 'chunks' of learning. However, such processes would deny the historical and social processes of the formation of qualifications. As the paper has attempted to outline these processes and as a consequence the relational aspects are different—and this needs to be so. This is the rub—and the central problem for an NQF—and especially a single NQF" (Keating, 2008).

Reflecting on the failure of the South African Qualifications Framework to achieve its aspirations, including its aims for upward social mobility through articulation, Muller (2009) notes that general rules are not appropriate; rather different qualification pathways require different arrangements:

"For each qualification pathway, the following must, from a knowledge perspective, be determined: What is the degree of specialisation required? What are the conceptual demands of the knowledge to be acquired? The greater the degree of specialisation, the more sequence matters, the more specific will the entry levels of competence have to be. If these are not in place, then bridging courses may be needed to supply them" Muller, 2009).

Wheelahan (2007) points to the hollowness of learning that deprives learners of the opportunity to develop a capacity to reason and imagine:

"A focus on specific content for a specific context means that the meaning of that content is exhausted by the context. Unless students have access to the generative principles of disciplinary knowledge, they are not able to transcend the particular context. Students need to know how these complex bodies of knowledge fit together if they are to decide what knowledge is relevant for a particular purpose, and if they are to have the capacity to transcend the present to imagine the future. Knowledge is not under their control. This simultaneously denies them epistemic access to the structures of knowledge relevant in their field and social access to the 'unthinkable'" (Wheelahan, 2007).

A major concern is the over-generalisation of competency-based training (CBT) assumptions in the construction of expectations of qualifications by focusing on the knowledge and skills that people need to 'do' their job, and by insisting that assessment be directly aligned with these outcomes (Wheelahan, 2007). This approach does most damage to those most socially disadvantaged (Allais, 2003).

4.4.3 Learning about change management in the development of NQFs

Notwithstanding the conceptual and technical difficulties with the proposed 'strengthening' of the AQF, a serious problem with the approach of the AQFC is its management of the process of change. It seems more focused on 'borrowing' from overseas frameworks than 'learning' from their experiences of success and failure (Chakroun, 2010). Despite all of the rhetorical claims about the virtues and benefits of national qualifications frameworks (NQFs), there is very little empirical support for their realisation (Tuck, 2007; Keating, 2008), and only limited evaluative knowledge to draw upon. The main evaluations relate to the Scottish, Irish and South African NQFs (Raffe, 2009b; Raffe, 2009c; Allais, 2003; Allais, 2007).

The experience of first-generation NQFs suggests that effective implementation requires long time scales, institutional embedding, stakeholder involvement, an iterative process of development, a loose design, and complementary policy measures (Raffe, 2009b). NQFs need to develop incrementally in relation to existing institutions and practices, even though this reduces their transformational potential (Raffe, 2009c). The starting point is that the introduction of an effective NQF has to be understood as a dynamic process, and that it is a social and political process as much as (or more than) a technical process, in that it involves:

- maintaining and/or building trust in qualifications and confidence in their underpinning standards and processes;
- aligning the 'intrinsic logic' of an NQF with the 'institutional logics' of the education and training system;
- a similar alignment with the institutional logic of the labour market: the ways in which employers use qualifications should correspond to the NQF rationale;
- widespread understanding and fluent use of the 'language' of learning represented by an NQF;
- cultural change, for example in basing pedagogies around learning outcomes;

- accommodating the interests of stakeholders, including education and training providers, and reconciling differences among them (Raffe, 2009c).

One of the few evaluative studies of NQF implementation is the Framework Implementation and Impact Study of the Irish NFQ in 2008-09 (Collins et al. 2009). Features of the Irish NQF are outlined in Box 46. The Irish NFQ can properly be seen as a reforming framework; an attempt to achieve substantial change through an evolutionary process.

Box 46. The Irish National Qualifications Framework (NQF)

“The Irish NQF was launched in 2003 under the terms of an Act of 1999. Its broad aims include supporting lifelong learning and cultural change, promoting access, transfer and progression, promoting quality and standards, rationalising existing provision and extending this provision where necessary. It is led by the National Qualifications Authority of Ireland (NQAI), which oversees the Higher Education and Training Awards Council (HETAC) and the Further Education and Training Awards Council (FETAC) which award qualifications in non-university higher education and in other post-school education and training (ET) respectively. It builds on, and extends, earlier measures to reform and rationalise qualifications in these two sectors. It is a comprehensive, outcomes-based, qualifications-based framework, with ten levels and a number of ‘award types’. The NFQ is a relatively loose framework, in the sense that it does not impose tightly prescriptive conditions for the qualifications within it, although it contains tighter sub-frameworks such as the Common Awards System being introduced by FETAC. However, guidelines for quality assurance and for access, transfer and progression are intended to cover all programmes and qualifications in the framework. The approach to implementation has varied across sectors, although the NQAI, HETAC and FETAC are to be amalgamated and the emphasis may shift from development within sectors to integration across them. The impact of the NFQ has also varied across sectors. It is greatest in the sector led by FETAC, which is re-modelling qualifications through its Common Awards System, filling gaps in provision and creating new pathways and progression routes. The framework also has a regulatory role in the HETAC sector, where more powers are delegated to ET institutions. The NFQ has no regulatory role with respect to schools or universities. It has had least impact in the school sector, but its close alignment with the Bologna framework has helped it to become established in universities.”

Raffe (2009c).

There is a tension between the radical aims of many NQFs and their need for a process of implementation that is the opposite of radical: that starts from the existing education and training system and proceeds incrementally, relying on the engagement of institutions with a stake in that system.

An imposed top-down approach to qualifications prescription and alignment risks breaking the communities of trust that underpin the integrity of qualifications (Young, 2007), privileging one set of purposes for learning (Wheelahan, 2009), and ignoring the distributed nature of ownership of qualifications (Keating, 2008), thereby constraining the quality of higher education.

In line with the experiences in Scotland and Ireland, the South African NQF has been modified to be more modest in its ambitions (Keevy, 2010), taking note of the caution that NQFs designed to achieve the most change will be the least successful:

“The experience of these (Scottish and Irish) frameworks points to a paradox. On the one hand, many countries introduce NQFs in order to transform aspects of their education and training system, their society or their economy. On the other hand, the most successful NQFs appear to be those with the most modest ambitions for system change” (Raffe, 2009a).

“...the most successful NQFs appear to be those with the most modest ambitions for system change.”

5. Possible ways forward

This part outlines the main implications for governments and universities of the issues discussed in the preceding parts. It explores the options available for addressing the areas of concern to governments and universities. It attempts to identify areas of potential agreement in respect of the problems to be addressed and the ways and means of addressing them. A number of principles are suggested for developing a mutual responsibility agenda. In relation to contested proposals for Australia, a set of counter-proposals is outlined.

5.1 Far-reaching changes in higher education fundamentals

The preceding parts described a number of changes in the nature and purpose of higher education, and in social expectations of and governmental relations with higher education institutions. Several of these changes are multi-dimensional and multi-directional. There are contested areas, and in some cases it is not clear how change will unfold. For instance, there are different trends as well as differing views, regarding labour market changes, and the implications for higher education and training. In these circumstances it is not possible to be conclusive about the problem definition let alone about emerging or converging policy solutions. And, it is prudent to exercise some caution in reading apparent international convergence in policy ideas, as much of it may be more about shared means than agreed ends.

Nevertheless, we can observe fundamental changes underway in ten broad areas:

- i. **The scale and diversity of students:** Enlarged student participation in higher education is moving beyond the 'elite to mass transition' to a post-mass or near-universal level, and involves a very diverse mix of students with varying backgrounds, aptitudes and motivations. The scale and the diversity, taken together, raise new challenges in (a) cost-effectively accommodating the learner demand, and (b) envisaging and accepting the diversity of outputs and outcomes.
- ii. **The number and types of providers, and variety in modes of higher education supply:** There are now many more providers of higher education, including private and public universities and other institutional types, comprehensive and specialised, campus-based and workplace-based, distance and open learning providers, and mixed mode providers. Consumer protection necessitates regulation of provider market entry. The great number and diversity of providers makes informed decision-making more difficult for consumers, employers of graduates and industry regulators. Internally-constructed representations of quality no longer suffice, and simple metrics and simplified comparisons cannot cope with the great choices available.
- iii. **Ways of learning:** People can learn in different places, in educational institutions or virtually, and in workplaces, and by different modes, in varying knowledge and cultural contexts. As less can be compared about the ways and means of learning, more attention is given to what learners have experienced and achieved and are able to do. However, as diversity increases—in student characteristics, provider characteristics and ways of learning—common bases of comparison become increasingly difficult and redundant.

- iv. **International mobility of students and graduates:** As learners come from different places and graduates go in many directions, educational credentials need to be useful for work and further learning anywhere. Students and graduates seek information about the distinctiveness of their study options, and educational institutions and employers seek information about the comparability of different qualifications and institutional standards.
- v. **Graduates as sources of productivity and innovation:** As advanced human capital has become an essential ingredient of a high-performance economy, governments take a stronger interest in higher education effectiveness as a means of improving the national skills base.
- vi. **Higher education as a passport:** As degrees have become the entry ticket to rewarding jobs, and a means of personal wellbeing and social inclusion, there is a stronger public policy interest in improving access, facilitating pathways and enabling success of people from disadvantaged backgrounds.
- vii. **An increasingly competitive environment:** Higher education institutions are operating in an international context of intensifying competition for funds and intellectual talent. They must have operational flexibility to be competitive.
- viii. **Changes in the nature of academic work:** Higher student teacher ratios, new teaching and learning technologies, greater use of casual teachers, preferencing of research over teaching, and loss of shared norms relating to assessment have acted together to reduce the intensity of teaching and learning, and the reliability of assessment.
- ix. **Concerns about quality:** Incidents of fraud, plagiarism, soft marking, reduced student time at study, and reduced academic staff time at teaching, alongside a long decline in the funding rate per student, give rise to worries about the quality of higher education. Governments feel obliged to address community concerns.
- x. **Erosion of trust:** The nine factors above have conspired to undermine public confidence in the integrity and quality of higher education. Governments are putting greater reliance on specification than judgement in accounting for quality.

5.2 Compelling grounds for government concern

In view of the changes noted above, there are compelling grounds for governments to be concerned to ensure that the community can have confidence in their higher education institutions, and the programs and qualifications they provide. The four main grounds are: probity; effectiveness; transparency; and comparability.

The probity threshold

In the interests of students and graduates and their employers, it is important that governments take appropriate action to weed out rogue providers, and expose fraudulent qualifications on offer within their jurisdictions. Accordingly, for the purpose of consumer protection, governments around the world are tightening provider licensing criteria, both for initial entry and subsequent compliance with entry registration conditions.

The effectiveness imperative

Modern economies must have more highly educated and skilled workforces to be competitive in high-end markets for goods and services. This requires effective action not only to ensure the availability of top-flight expertise but also to raise human capital capacity across a wider base.

The education and training system must actually produce the output quality that is required. If it fails to do so the economy will be less productive than it needs to be and an unacceptable number of people will fail to find rewarding work.

It will not be sufficient merely to produce more people with higher qualifications on paper. The qualifications must have meaning in testifying to the possession of understandings and skills.

A major challenge is to achieve better learning outcomes for groups of people who have not been and are not being well served by education and training systems.

The transparency requirement

The criteria for decisions need to be open for those outside the academy to see and understand. There is a call to make more explicit the implicit judgements which have been made traditionally within the confines of universities, for instance, about assessment grades and credit for prior learning.

The comparability challenge

The increasing international mobility of higher education students and graduates, and the proliferation of providers of higher education services and qualifications, challenge governments to find new ways and means of safeguarding credential integrity, and improving the authentication and comparability of educational qualifications.

...there are compelling grounds for governments to be concerned to ensure that the community can have confidence in their higher education institutions, and the programs and qualifications they provide.

5.3 New imperatives for universities alongside the need to safeguard important values

Universities have the dual challenges, on the one hand, of responding to change and generating new ideas and, on the other hand, of managing the continuation of their conservative function of critically preserving knowledge and discerning truth. Contemporary universities are expected to contribute in deep and diverse ways to multiple economic and social demands, including economic development through the production of advanced human capital, research breakthroughs and scholarly insights into complex issues, and social and environmental problem solving. They can only do so by drawing upon their traditional roles as unique learning organisations, and there are important values for universities to safeguard to that end.

There are also imperatives for universities which are operating in a fiercely competitive and dynamic international environment. They need to be able to secure the resources necessary to sustain their capacity and performance. They must have operational flexibility to adapt to change. And they need to be able to develop their distinctive strengths and forge alliances with others, not least on the world stage.

Contemporary universities, especially those heavily involved in research, need some predictability in government policy and financing through 'patient capital', recognising the long lead times often required for fundamental inquiry, and an appreciation, even amid the pressures for immediate relevance, of the intrinsic value of knowledge.

There is a lot at stake for universities, and for the communities they serve, if governments fail to achieve a proper balance in their responses to the new concerns outlined above. In Australia's case, proposals to have standards set externally by a body established under federal government legislation will, if adopted, constrain universities' self-accrediting powers, for all the awards they offer whether government funded or not, and erode their substantive autonomy—that is, their self-regulation of curriculum and assessment—as well as their operational autonomy—the flexibility they need to be responsive and innovative.

There are also imperatives for universities which are operating in a fiercely competitive and dynamic international environment.

5.4 Areas of agreement and disagreement

There are some shared concerns and areas of agreement about new forms of action on the part of governments and higher education institutions. There are also differences of view. The differences relate to the understanding of the problems to be addressed as well as the solutions proposed.

5.4.1 Perspectives on the nature of the problems

The main area of agreement relates to the necessity to tighten up loose arrangements for the registration of higher education providers, at least for purposes of consumer protection. 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. If there is to be expanded entry of new providers, including more private providers (although there is no indication yet of government intentions in this regard), then it is prudent now to begin to strengthen the policy architecture for provider market entry. Thus the agreed priority is to focus on the threshold standards for provider registration.

From a competitive neutrality perspective, it is necessary that the regulatory framework for provider registration applies to all players, including public universities, but on a risk-proportionate basis. A broader sense of perspective is required in appreciating the role of universities as special institutions in the society. It is not necessary to adopt a tail-wagging-the-dog approach indiscriminately across the board, and fetter established universities when there is no cause to do so.

Beyond the threshold there is greater disagreement. In Australia, there is no evident crisis of confidence in universities, courses or graduates. There are no major labour market clearance problems for graduates. There are no public campaigns by students, employers or others enjoining politicians to 'fix the university problem' (regrettably not even to fix up the funding inadequacies and anomalies). There are no signs that Australian graduates are being systematically rejected by international universities or employers, and no indications that international students are turned away from study in Australia by concerns about educational quality. To the contrary, all of the available evidence of 'outcomes' are positive, whether graduate satisfaction, graduate acceptance for further study, and graduate employment, income and private rates of return to human capital investment. So what justifies the intrusive approach being proposed? It seems we have a set of politically-preferred solutions looking for a problem. Hence, as discussed below, there is fundamental disagreement about the disproportionate means being adopted to address emerging issues resulting from a policy (however misguided) to enlarge student participation by lowering entry standards.

It seems we have a set of politically-preferred solutions looking for a problem.

Additionally, there are two contested assumptions: one concerns the myth of 'parity of esteem' of higher education awards; the other concerns the inappropriateness of 'consistency' as a beyond-the-threshold principle.

The view that all degrees (in a given field at a given level) are the same is an implicit judgement on the part of policy makers. It underpins common funding rates and common expectations of graduate capabilities. As discussed at 4.3.5 above, there are now very wide differences in the input factors to higher education, including students and teachers whose interactions are the critical determinants of learning, and it is a pretence to expect that those differences would cease to be evident among graduates. Parity would require those less prepared and resourced to make great leaps forward while those better prepared and resourced slipped back. There is little chance of such a systemic coincidence:

“Nearly half of the young population now participate in higher education, the range of ability of those students is very wide, and the purpose, nature and intended outcomes of programmes all vary considerably. It makes little sense to seek comparability of outcomes, and indeed it would actually be wrong to do so” (Brown, 2010a).

The parity myth diminishes the importance of place to learning. In particular it reduces the importance of universities as special places for learning, as well as denying differences among universities, such as those that offer education in the context of intensive research and those that don't. Hence it functions as a pillar for an undifferentiated higher education system, regardless of the tendency in higher education for quality to find quality. In like manner the 'consistency' principle applied to curriculum and learning outcomes stands in antagonism to diversity in national higher education systems. The conceptual flaw of regarding consistency as a normative factor has been discussed at 4.3.5 above. The preconditions for consistency of higher education qualifications and learning outcomes include (a) tight prescription of qualifications titles consistently assigned by explicit and sound criteria to meaningful levels of expected graduate capabilities, and (b) a national curriculum and the use of common standardised tests across all graduating classes of all nationally accredited higher education providers. With regard to (a) any prescription of qualifications by levels is arbitrary rather than scientific (Blackmur, 2004). With regard to (b) clearly this is not going to happen. It would not work, because it cannot be practically implemented, even if it were to be imposed.

The parity myth and the inappropriate consistency principle are being carried into contemporary policy through the AQFC and TEQSA, in ways strangely reminiscent of soviet-era conformity to sameness, and blind to the obvious diversity and dynamism all around. As noted earlier, a broader outlook is necessary, as is being called for in Britain:

The parity myth and the inappropriate consistency principle are being carried into contemporary policy through the AQFC and TEQSA, in ways strangely reminiscent of soviet-era conformity to sameness, and blind to the obvious diversity and dynamism all around.

“There is no mechanism to ensure consistent and meaningful comparability among institutions and subjects, and no mechanism I can envisage that could make it so... We seem in this country to have no capacity to think beyond monolithic hierarchies and, in trying to shoehorn very different purposes, clienteles, structures and people into a single narrow boot marked ‘The only acceptable HE standards for the UK’, we perhaps reduce our opportunities to innovate, develop and recognise a much more useful set of standards based on the particular characteristics of the students and programmes being offered. Provided the standards are clearly stated and readily available, validated by the relevant subject and professional community as useful, valuable and appropriate, and form the basis for the assessment of students, then the variations between subjects and institutions should become a reason for celebration, not the sort of angst about irreconcilable differences” (Williams, 2010).

5.4.2 Perspectives on solutions to the problems

The two main world trends in higher education quality assurance are:

- i. the strengthening of standards-based provider licensing conditions, in terms of (a) threshold conditions for initial registration; (b) closer monitoring of provider compliance with registration conditions; and (c) regular rather than ad hoc re-registration procedures, especially for private providers but encompassing all providers (Martin & Stella, 2007).

- ii. a shift away from external control and regulation to greater responsibility by higher education institutions for their own quality monitoring, thereby leaving greater scope for internal mechanisms geared towards improvement (Santiago et al, 2008).

As noted above, the first is an agreed priority for Australia, but the second remains a matter of contention. In Australia the proposed approach to higher education standards and quality is more prescriptive than elsewhere, and there is less open discussion and consideration of the rationale and implications of the approach than in the US, Britain and continental Europe.

The process of policy development is itself problematic. There is an absence of policy coherence for system stability, institutional performance and consumer protection. Issues relating to standards for provider registration and learning outcomes are being conflated rather than separated. A common and process-oriented approach across all higher education providers is continuing to be advanced regardless of advice to the contrary from advisory groups and consultation processes.

The AQF Council is assuming ownership of qualifications (referring to 'AQF qualifications' rather than 'AQF-recognised qualifications'), persisting with an over-specified and de-contextualised model for higher education qualifications, restricting types of qualifications rigidly to single levels of learning outcomes descriptors, and prohibiting qualifications titles long offered by universities and funded by the Australian Government, and qualifications that have international reputability for which there is student demand. The proposed solutions are actually a cause of new problems.

In Australia the proposed approach to higher education standards and quality is more prescriptive than elsewhere, and there is less open discussion and consideration of the rationale and implications of the approach than in the US, Britain and continental Europe.

5.4.2.1 Retreat from meta-regulation

'Meta-regulation' may be understood as the "regulation of self-regulation" (Parker, 2002), whereby regulatees are required to "evaluate and report on their own self-regulation strategies so that regulatory agencies can determine whether the ultimate substantive objectives of regulation are being met" (Parker, 2002). In Australia, a meta-regulation approach has been adopted through the external quality auditing practices of AUQA (Scott, C., 2003). The advantages of the AUQA model in respect of universities are (a) that it recognises that universities have governing bodies with statutory powers and responsibilities for the effective conduct of the university's affairs, and associated internal policies and processes for monitoring their performance, and (b) that the external audit processes "stimulate auditees to take greater responsibility for devising and monitoring compliance with their own self-regulatory standards" (Scott, C., 2003).

Unhappily, the TEQSA model involves a departure from meta-regulation, of checking and steering the self-regulatory mechanisms that universities have established, to regulatory control through external prescription of standards, compliance monitoring of performance in relation to those standards, and associated sanctions, such as loss of registration or ineligibility for funding. This is a step too far backwards, and is disproportionate to the problems being addressed. Universities have long-been self-regulating institutions and it is no small concession to yield that prerogative, given there is no evident need for them to do so.

5.4.2.2 Tendency to sameness

A common rather than customised approach to standards and quality is being adopted. This reflects, in part, the carry-over myth of parity of degrees and the inappropriate consistency principle discussed earlier. It also reflects a logical leap from (a) the need for standards-referenced performance assessment to (b) the need for common standards—the same performance measures for all universities irrespective of differences in institutional circumstances, student mix and purposes. Whereas it has been suggested (Findlay, 2005) that the new accountability for quality agenda represents a shift from ‘fitness for purpose’ (mission-related) towards ‘fitness of purpose’ (commonly shared standards and benchmarks), it is equally open to portray the development as a supplementation rather than a shift. To that extent it is reasonable to seek to accommodate both common and customised approaches in order to avoid a tendency to homogeneity. A standards-based approach can function with reference to different institutional standards rather than requiring a single standard or common set of standards for all institutions. A single standards model may well be the easy approach for the regulators because it avoids the need to exercise judgement, but it denies diversity. If diversity is to be denied or constrained, there will be a consequential reduction of learner choice, a lessening of competitive pressure to innovate, and an overall tendency to mediocrity:

A single standards model may well be the easy approach for the regulators because it avoids the need to exercise judgement, but it denies diversity.

“Standards can stifle diversity and innovation and convey a false positivist assurance that we know what quality is and how to identify it” (Sursock, 2007).

5.4.2.3 Intrusiveness

The overly prescriptive approach being adopted will both intrude on professional judgement and reduce institutional operating flexibility. Over-codification of tacit knowledge will induce non-discretionary assessments, and tend to reinforce a tendency to uniformity. The extent of intrusiveness into university affairs that is envisaged is unprecedented in the democratic Anglo world. Various aspects of the “higher education standards framework”, as outlined at 3.5.5 to 3.5.7 above, potentially intrude into matters of curriculum, pedagogy, assessment, and the hiring, development and management of academic and professional staff. Additionally, narrow and common performance indicators relating to funding agreements are limiting in this context. The pursuit of simple metrics and simplistic comparisons for the most complex and least directly measurable aspects of higher education—the quality of learning—is not only a folly but a danger. It is a folly because it is an attempt to capture the elusive. It is a danger because it trivialises learning.

5.5 Tactical considerations for universities

If a government were to persist with its intention to achieve 'reform' through coercion, despite the resistance of established institutions which are portrayed as being self-serving and unresponsive, how might the institutions themselves respond? Should they merely comply with the dictates of the authorities or challenge their assumptions, evidence and solutions? Or might they play along with the new game rules in ways that render the rules ineffective? Can one institution, or one group of institutions, afford to go up against the authorities? What do they have to lose by so challenging, and what might they gain? If one or more institutions refused to consent to the directives of government, what could actually happen? Would a government be able to act in a politically defensible way, even if it had legal authority, to deny or cut funding, or threaten de-registration in respect of an otherwise reputable university which offended, for instance, by offering degree programs not listed on the national qualifications framework but which responded to student demand and had valuable international currency?

Whereas, by virtue of an electoral mandate, governments may claim to set the agenda from the top down, in the academic arena authority is conferred from the bottom up. Legitimacy cannot be merely asserted; it must be won—and in the academy what matters more than position power is the power of argument and evidence. Governments may want to mandate, whether through legislation or punitive incentives, but their power to do so in democratic societies is only as strong as the willingness of the community (in this case at least the academy and its leadership) to comply.

Oliver (1991) analysed how organisational behaviour may vary from 'passive conformity' to 'active resistance' in response to external pressures, depending on the nature and context of the pressures themselves (see Figure 2):

"When an organisation anticipates that conformity will enhance social and economic fitness, acquiescence will be the most probable response to pressure... When anticipated legitimacy or gain is low, organisations will attempt to compromise on the requirements for conformity, avoid the conditions that make conformity necessary, defy the institutional requirements to which they are advised to conform, or manipulate the criteria or conditions of conformity" (Oliver, 1991).

Oliver also suggests that organisations are more likely to acquiesce when they have high levels of dependency on those who exert the pressure, and when the consequences of non-conformity are highly punitive and strictly enforced. Partial conformity can be expected when the organisation seeks to protect its own interests. Organisations can be expected to attempt avoidance strategies in the face of multiple conflicting pressures. Organisations can be expected to compromise or negotiate when the pressures constrain organisational autonomy. Organisations may also work to influence or attempt to control standards or demands that they perceive to inhibit discretion, and may be willing to trade off autonomy or discretion in return for greater legitimacy or economic viability. A defiant strategy is likely to be pursued only when an organisation believes the costs of compliance are too great and it has little to lose from non-compliance.

Figure 2. Organisational responses to external pressures

Strategies	Tactics	Examples
Acquiesce	<i>Habit</i>	Unconscious adherence to taken-for-granted norms
	<i>Imitate</i>	Mimicking successful models, accepting advice of consulting firms
	<i>Comply</i>	Conscious obedience of rules and acceptance of norms
Compromise	<i>Balance</i>	Balancing multiple constituencies, playing off one funder against another
	<i>Pacify</i>	Placating constituents through partial conformity
	<i>Bargain</i>	Negotiating with stakeholders
Avoid	<i>Conceal</i>	Disguising nonconformity behind a facade of acquiescence
	<i>Buffer</i>	Decoupling attachments among activities to reduce external scrutiny
	<i>Escape</i>	Changing goals, activities or domains
Defy	<i>Dismiss</i>	Ignoring rules and requirements
	<i>Challenge</i>	Contesting rules and requirements
	<i>Attack</i>	Assaulting the sources of pressure
Manipulate	<i>Co-opt</i>	Importing influential constituents, building coalitions
	<i>Influence</i>	Shaping values, criteria and procedures
	<i>Control</i>	Dominating constituents and processes

Source: Oliver, C. (1991).

The preferred tactics for universities are likely to be those of ‘bargaining’, ‘influencing’, and co-opting (especially through coalition building). Arguably, these are the most active and honourable of the available tactics (given that some of the other tactics may involve an element of deceit or gaming). The tactic of ‘compliance’ is appropriate in cases where the pressure is exerted widely and has a public good purpose. The option of ‘challenge’ is also available in cases where the pressures exerted can be shown to be unreasonable, disproportionate or harmful. In this regard there is a tradition, gained through struggles against state or church coercion, of university autonomy and academic freedom which should not be lightly dismissed.

Given the disproportionate regulation and intrusiveness into matters of traditional university autonomy involved in the accountability for quality agenda in Australia, university leaders have no conscionable option but to challenge the Government’s agenda with a view to rectifying its flaws.

5.6 What are the prospects for reducing the confusion and conflict?

Even at this stage, universities should be constructive rather than passive or resistant in helping to shape a public policy agenda to address the challenges outlined above, so that the resulting policy settings are well balanced. For that to be possible, government policy formation needs to be open to dialogue rather than closed and imposing, and policy intent and meaning needs to be clarified. As noted at 4.3 above, there is great confusion about the meaning of even basic terms. An initial requirement of constructive consultation is a set of agreed definitions along with a clear statement of government policy intent. The secretive and rushed but apparently uncoordinated nature of policy development to date has generated disquiet in the university community. Little will be achieved without a period of stock-take, reflection and re-engagement with proper processes of consultation.

Trust needs to be built on both sides. On the one hand, those proposing and developing the new intrusive standards and quality regimens for higher education appear to be operating from the premise that the community and governments have lost or reduced their trust in universities and other higher education institutions. On the other hand, the university community and others are distrustful of the intentions of governments and advisers in the pursuit of this agenda. There is sufficient material in the public domain to indicate serious consideration of policy interventions that go well beyond the rhetoric of government. Even if there was to be some softening of approach, there will be residual difficulties; however well-intentioned or benign initially in their design and intent, broad-ranging regulatory frameworks pose the real danger that once established they will be applied ever more prescriptively.

A remorseless tendency over the last few decades is for government agencies and policy advisers to believe not only that universities are effectively agents of the state but that they, the government bodies, are the drivers of improvement without whose guidance the system would degenerate. The fact is that most universities are well ahead of government bodies in asking the hard questions about their performance and trying ways to improve; universities are 'always-questioning' organisations. However, much of that effort is not visible to outsiders. A more transparent approach to internal criteria and procedures may help to bridge the knowledge gap and improve understanding.

There is in-principle agreement about the need to strengthen provider registration requirements. The arguments are not about whether that should happen but how: what is to be regulated and how it is regulated. The principal contention is about the principle of regulation proportional to risk, as discussed later. The major disagreements are to do with the assertion by government of a determining role in the internal affairs of self-regulating universities, beyond the threshold of provider registration, whether through external standards setting that limits the discretion of universities, or through conditionality in funding arrangements that require compliance with government mandates, or a combination of both.

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The major disagreements are to do with the assertion by government of a determining role in the internal affairs of self-regulating universities, beyond the threshold of provider registration, whether through external standards setting that limits the discretion of universities, or through conditionality in funding arrangements that require compliance with government mandates, or a combination of both.

In seeking to reconcile the legitimate needs and interests of both governments and higher education institutions, there are four basic policy options: a voluntary system; a market-based system; a centrally mandated system; a mutual responsibility agreement.

A voluntary model of response to government and community concerns, such as the US Voluntary System of Accountability will not suffice, if it does not provide a comprehensive framework for increased transparency and include all manner of educational offerings and provider types. Prospective students should have access to information about the full range of learning options. They should be able to see how offerings differ, and be able to make meaningful comparisons in their areas of interest, to inform their study choices. Similarly governments, want to be able to assure the community that cost-effectiveness is being achieved across the totality of the higher education system within their jurisdictions. They need to be able to see where there might be gaps and deficiencies in the supply of graduates so that they can take action where necessary.

Market process for self-regulation may generate information guides for consumers but reliance on competition would not satisfy the need to address those problems for which market operations themselves are responsible, such as rogue providers, bogus qualifications, short-cut methods that short-change students, and poor quality of education.

A centrally-mandated prescriptive approach would be too inflexible and stifling. It would render Australia's higher education institutions internationally uncompetitive.

What might work is an agreed mechanism for higher education providers to describe their distinctive offerings against a common reporting template of descriptors for the range of programs for which they award qualifications. This information could be provided on the *MyUni* website along the lines of the US College Portrait, but with performance information related to institutional mission and objectives, and validated by independent external review, along the lines of the UK external examining model, for similar institutional classes. This information could be augmented by institution-level descriptors, perhaps along the lines of the U-Map model. A variant of the European Diploma Supplement (AHEGS) could provide additional information, including equivalence of a particular qualification with international descriptors of 'levels' of attainment. Such an approach would enhance transparency and comparability without diminishing diversity.

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5.7 Agreement on respective roles and responsibilities

The selection and design of policy instruments depends primarily on the challenges to be addressed, the goals to be achieved, and the agent most able to take the action required. If the primary purpose is compliance then government control models will be the most effective. If the primary purpose is improvement then academic control models are the most appropriate.

Box 47 provides a categorisation of policy instruments for “the regulation of academic quality” (Dill 2003). The columns represent differences of control: with regard to teaching and learning, the professional or self-regulation column reflects producer sovereignty; the middle column reflects state sovereignty; and the market column reflects consumer sovereignty (Dill 2003). An alternative portrayal of these differences is that self-regulation reflects a view of the university as an autonomous cultural institution, state regulation reflects a view of the university as part of the nation’s civil service implementing public policy, and market regulation reflects a view of the university as a competitive enterprise in the knowledge business (Findlay, 2005).

In determining the most appropriate mix and balance of policy instruments, it is necessary to be clear about the reasons for their application. That necessarily requires a consideration of respective roles and responsibilities.

Box 47. Alternative Policy Instruments for Assuring Academic Standards			
	Locus of Influence		
Focus	Professionals (Self) Regulation	State Regulation	Market Regulation
Research	<ul style="list-style-type: none"> Professional Peer Judgments 	<ul style="list-style-type: none"> Research Assessments (RAE) 	<ul style="list-style-type: none"> Competitive Allocation of Research Funds by State
Teaching/Learning	<ul style="list-style-type: none"> Professional Disciplines/ Organisations External Examining Systems Voluntary Accreditation 	<ul style="list-style-type: none"> “Assessment Regulations” (US) Academic Audits Subject Assessments Performance-based Funding National Examinations State Accreditation 	<ul style="list-style-type: none"> Student-based Funding and Tuition Fees Information Provision
Dill, D. (2003).			

5.7.1 Responsibilities of government

Governments are responsible for responding in a timely, coherent and cost-effective manner to matters of concern to their communities. In broad terms, the community looks to central governments primarily to tackle the big picture issues rather than become involved in micro-level matters that can be devolved to other levels of government or undertaken by specialist service providers whether public or private. In respect of higher education the roles of central government include providing policy direction, incentives and regulatory frameworks for structuring the supply of education services to accommodate student demand and producing an educated citizenry and workforce to meet community needs. Particular initiatives may include adequate funding for

...the community looks to central governments primarily to tackle the big picture issues rather than become involved in micro-level matters that can be devolved...

institutions, the provision of financial assistance to students, and incentives to promote equity of access and ease transitions across education, training and work.

Understandably, governments have an interest in ensuring that the goals of universities and other institutions align with their wider social and economic goals. However, they normally 'steer from a distance' (Marceau, 1993) rather than engage regularly in direct monitoring of institutional effectiveness, which is properly the responsibility of university governing bodies. It is proper not only because it reflects an appropriate separation of accountabilities but also because it is most practical, given that central government policymakers and administrators have little capacity to review and act on the kinds of qualitative outcomes assessment data that are collected and reviewed on an ongoing basis within universities. It is best that governments focus on the areas where they can best add value and be least distracted:

"An accountability system focused on state-level concerns is designed to answer questions to inform state policy decisions about system design, governance, articulation, and finance. It asks how are we, collectively as a state, doing in achieving our goals. An accountability system designed principally to collect and review data on institutional performance asks a totally different question: how well is an individual college or university accomplishing its unique mission? This institutional focus has several problems: it diverts state policymakers from the issues that they can influence through their responsibility to make public policy; it leads to micromanagement over institutions, whose own governing boards are responsible to monitor and manage institutional effectiveness; and it overloads state accountability systems with far more data than users can possibly digest and use. Finally, by reflecting a top-down "we (policymakers) are holding you (college) accountable for your performance" approach, it invites arguments about the adequacy of funding, factors outside the college's control, and the overall fairness of the top-down assessment" (Shulock, 2003).

5.7.2 Responsibilities of universities

Universities as self-governing institutions are responsible for achieving the goals they set consistent with their missions. They respond to policy, administrative and market signals, and they account to the communities that support them for the stewardship of their resources.

They have particular responsibilities regarding the selection and admission of students, curriculum, pedagogy, assessment, and the provision of student services and alumni services, alongside the professional development of academic and administrative staff. They also have responsibilities for the ethical conduct of research, the preservation of knowledge and the publication of scholarly outputs, and contributions to national, regional and community development. And they have responsibilities for continuous improvement in all that they do.

As discussed at 4.3.2 above, with regard to the accountabilities of universities to the students they admit, Scott (2008) has suggested four foci: design; support; delivery; and effect. The first of these (design) requires a university to make clear what it stands for (mission and values), what it seeks to achieve (fitness of purpose) and how it structures the learning experiences it offers (fitness for purpose). The second (support) and third (delivery) areas are to do with how well the designed approach is implemented. The fourth dimension (impact) is where the rubber hits the road: how well do students learn, and how useful is their learning to their life prospects?

It is reasonable to expect that each university will have in place processes to validate its mission, review the fitness of its program design, verify that its delivery meets the standards it has set, and know how well its students and graduates perform.

It is reasonable to expect that each university will have in place processes to validate its mission, review the fitness of its program design, verify that its delivery meets the standards it has set, and know how well its students and graduates perform. These processes as well as the results they achieve should normally be subject to systematic internal review and independent external review.

5.7.3 Mutual responsibility rather than principal-agent relationship

Governments have two main policy options in the design of their relations with universities: a principal-agent model of accountability, or a mutual responsibility model of shared development. The latter is the more likely to lead to performance improvement, and to do so in ways that enable broader service delivery effectiveness.

Accountability involves rendering an account about what one is doing in relation to the goals and expectations of others (Santiago et al., 2008). Accountability obligations are established when an agent accepts resources and responsibilities from a principal (Barton, 2006). The principal/agent model of contractual relationships prioritises the agent's compliance with the purposes and performance and information requirements of the principal (Broadbent & Loughlin, 2003) over their wider stewardship responsibilities for serving broader public needs (Kluvers & Tippett, 2010).

The emphasis on reporting the measurable aspects of performance can reduce service delivery effectiveness (Funnell, 2003). The principal/agent model of accountability contrasts with the mutual accountability model, wherein goals are shared and there is 'buy-in' to responsibilities through "developing shared understanding, respect, trust and mutual influence" (Brown, L. 2007).

A principal-agent approach would work from the premise of an expectation that a university ought to comply with standards set by others. In contrast, a mutual responsibility approach would start from an acceptance by others of a university's self-set standards. Only if a review of the self-set standards (fitness of purpose) were to find deficiencies would it be reasonable for government to require adherence to an externally-determined set of standards.

Within a mutual responsibility agreement, in relation to the agenda compelling governments, as outlined at 5.2 above, the following expectations of higher education institutions may be proposed:

The probity threshold: Higher education institutions should be able to demonstrate that they have adequate capacity and integrity to deliver what they undertake to deliver.

The effectiveness imperative: Higher education Institutions should have verifiable means for knowing how well students are acquiring the knowledge, understandings and abilities expected.

The transparency requirement: Higher education institutions should publish information about their distinctive offerings and requirements, along with clear criteria and codified procedures for judgements relating to admission, credit, and assessment grades.

The comparability challenge: Higher education institutions should make available reliable information to enable students and employers to see similarities and dissimilarities between different programs, learning opportunities, expected standards, and graduate attainment and outcomes.

Only if a review of the self-set standards (fitness of purpose) were to find deficiencies would it be reasonable for government to require adherence to an externally-determined set of standards.

5.7.4 Common and customised institutional accountabilities

For the accountability and improvement purposes of higher education quality assurance to be reconciled in the contemporary circumstances of post-mass participation and diversity of provision, it may be useful also to distinguish between 'normative' or 'common accountability' and 'customised accountability'.

Normative accountability seeks to ensure that higher education institutions conform to a set of basic requirements. It involves the use of common benchmarks for comparing the capacity and performance of institutions. The common benchmarks may include prescribed minimum standards in respect of inputs, processes or outputs, and they may include prescribed measures and instruments for reporting.

Customised accountability seeks to ensure that a higher education institution delivers to its promises. It involves the use of selective indicators designed to measure how well each institution performs relative to its own goals and expectations:

"Locally developed measures have the potential to represent accurately the specific institutional outcomes of higher education given their proximity to what is assessed, rather than standardised assessments, which are distant from the missions and objectives of individual institutions" (Allen & Bresciani, 2003).

It should be possible to agree on a framework that provides for both common and customised accountability and transparency. This suggestion is an extension of a proposal by Grant 2006. In discussing the application of competence frameworks, Grant has noted the coexistence of compelling cases for both common and specific frameworks (Grant, 2006). On the one hand, different companies have specific sets of competences, along with generic skills, for performing the activities of their business, and educational institutions may be motivated to emphasise the particular competences that distinguish their graduates from those of other institutions. On the other hand, labour mobility requires that individuals educated or trained in one place should be able to find work elsewhere, and employers and professional bodies need to know that graduates meet required standards of competence. Grant suggests the need for a judicious blend of common and specific approaches:

It should be possible to agree on a framework that provides for both common and customised accountability and transparency.

"An insistence on a completely common framework would deny the freedom to experiment, and the freedom for views to differ about which competences are necessary for which roles. But a fragmented approach, where every organisation has its own competence framework, would make life very difficult for self-directed lifelong learners with multiple, diverse and complex career paths" (Grant, 2006).

Grant suggests a meta-framework that allows for two interrelated kinds of competence frameworks: one that is relatively loose and amenable to agreement among different stakeholders, for generic shared competency definitions in particular domains; and the other that is more specifically designed to suit the requirements of a particular body.

Thus, in respect of universities, the Government's standards-based agenda could constructively accommodate a judicious blend of (a) a menu of common indicators from which universities select those that are most appropriate to their circumstances, and (b) a set of customised indicators that reflect the objectives and standards that each university has determined.

The questions subsequently to be addressed are (a) which common standards, in terms of their (i) range and (ii) composition, (b) the balance between common and customised standards, (c) the

balance between whole-of-institution and program-specific standards, and (d) the means by which performance standards are verified. These are significant questions. They are matters for judgement rather than technical considerations. They are so fundamentally important that they need to be referred to public consultation and dealt with openly and systematically, not settled in-house or merely by conference with a limited group or by otherwise cosy agreements. Given the recent opacity of considerations about these matters, any attempt to arrive at apparent consensus through closed dealings will lack legitimacy.

5.8 Threshold Requirements for Licensing Higher Education Providers

To be licensed to commence operating as a higher education provider in Australia it should be necessary to meet specified minimum standards of inputs and processes, such as those relating to staffing, facilities, finance, and governance. Requirements would vary according to the scale and scope of proposed provision, and should have regard to already existing requirements arising from university establishment acts and other legal obligations, such as those deriving from corporations law.

5.8.1 Standards for initial provider registration

A standards-based approach to provider licensing (accreditation or registration) relates to the threshold criteria for bona fide operation. The standards need to be set and applied on a nationally consistent basis, given that providers can and do operate across the jurisdictional boundaries of the states and territories. The standards cannot be lowered for any provider.

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. It is also an approach that reflects the prudent practice of keeping separate the powers of standards setting from standards monitoring and enforcement.

Higher education provider registration standards should continue to be set by the inter-ministerial council of the Commonwealth, states and territories.

5.8.2 Monitoring of provider compliance with registration conditions

TEQSA should function as the national regulator of provider conformity with threshold standards of operation. It would be important to monitor regularly the compliance of new providers with their registration requirements, including their student enrolments and staffing provision, as the recently exposed problems with private providers in the international student market resulted from unchecked expansion beyond their registration limits.

5.8.3 Re-registration of providers

With regard to initial registration, the approach necessarily focuses on inputs (e.g. teaching capacity) and processes (e.g. governance arrangements). With regard to periodic re-registration, the question arises as to whether it is sufficient to continue to focus on compliance with the capacity-related conditions of initial registration (inputs and processes) or whether it is necessary to consider aspects of performance, and have regard also to outputs and outcomes. A subsequent question is whether the quality of performance should be referenced to a common set of standards, or to standards relating to the specific purposes of particular providers, or to a combination of common and customised standards, as discussed above.

If performance quality for this purpose is a criterion of acceptability of a provider's continuing operation, then it is appropriate to require performance against some common standards. If diversity is to be valued, then it is also appropriate to evaluate performance against customised standards

reflecting the distinctive purposes of different providers, the more so if one adopts a dynamic view of quality as continuous improvement. Hence, a model akin to the US Accreditation and Quality Assurance System has its attractions (see 1.1 above).

A fundamental question is whether re-registration is to be based on (a) a comprehensive review of a provider's operations; or (b) periodic thematic reviews of all providers whether by function (e.g. assessment) or field (e.g. law); or (c) specific investigations of signals of operational deficiency affecting educational effectiveness whether on a just-in-time or just-in-case basis?

Option (a) would be the most appropriate approach for the purpose of provider re-registration. Option (b) is more suited to a different purpose—that of identifying areas for performance improvement. Option (c) could be a complement to option (a), where specific signals were sufficiently strong to warrant review ahead of scheduled arrangements.

5.8.4 Re-regulation proportional to risk

Given the rate of change and the need for competitive neutrality, it is necessary for periodic processes of re-registration for all higher education institutions, including all universities, through procedures that are proportional to risk. If re-registration is to be focused on eradicating deficiencies then it should be based on an assessment of risks to the sustainability of quality.

A self-assessment report would be the obvious initial reference for a re-registration review. TEQSA could issue guidelines for provider self-assessment.

For public universities, there are particular information sources that could be drawn upon in adopting a risk-based approach to re-registration, including independently audited annual reports, and performance information relating to student progress, graduate destinations and student satisfaction.

These reports should be the basis of risk assessment that may give rise to second-order investigation by TEQSA where there are signals of concern. More intensive investigations and possible sanctions would be warranted where a university was unable to satisfy TEQSA that it could sustain an acceptable level of performance. Otherwise, where a university is operating effectively the re-registration process would be light-touch.

Matters arising in this context that require particular consultation include:

Is the re-registration bar to be at a whole-of-institution level, or at program (award) level or at some other level (e.g. disciplinary units of study), or at some combination of the foregoing? How are academic programs within institutions to be assessed, and over what periods of time? What constitutes risk? Will there be risk gradients (e.g. high, medium, low)? What would constitute a light-touch audit as distinct from a moderate or intensive audit? By which criteria would an institution qualify for light-touch treatment? What risk indicators are to be used? How much of the risk assessment will be related to quality factors (e.g. curriculum substance, assessment validity and reliability) as distinct from vulnerability factors (e.g. financial risk exposure, dependency on volatile markets, competitive strength)? What weight, if any, would be given to organisational, cultural or process factors (e.g. staff development, internal review mechanisms, student engagement indicators)? How would deficiency in one program affect registration status or funding? How much time would an institution have to rectify deficiencies? To what extent would an institution be permitted to open new program offerings while attending to problems in another program area?

5.9 Beyond the Threshold: Enhancing Student Learning and Graduate Attainment

Beyond the threshold of acceptable capacity and performance for initial licensing and re-registration, a standards-based approach to higher education quality necessarily relates to the criteria that higher education institutions themselves set in respect of their provision (e.g. standards of teaching, standards for resourcing teaching and learning, standards for availability of learning materials, standards for student support services), and the assessment of their effectiveness.

5.9.1 Setting expectations

Universities determine their standards of education having regard to a range of expectations, including the capabilities they seek in their graduates, and their own professional academic expectations and understandings of good quality. They make reference to external standards as guides to their decision making. These references may include: the national qualifications framework and descriptors of learning outcomes; statements issued by professional bodies relating to program requirements for graduates preparing to practise in registered professional occupations; statements issued by disciplinary communities; standards set by similar universities elsewhere; findings from surveys of students, graduates and employers; and innovative approaches being undertaken elsewhere:

In relation to the exploration of 'learning and teaching academic standards' in the Australian context, Nicoll (2010) has suggested, that while defined minimum academic standards will be used by TEQSA for regulatory purposes, they should still allow for diverse approaches to curriculum and teaching, and permit institutions to demonstrate their distinctiveness beyond the minimum threshold:

"Threshold learning outcomes are the defined minimum that graduates are expected to achieve but we would expect that most will achieve more. By defining minimum national standards for learning outcomes we protect the reputation of Australian education. By exceeding and customising the minimum national standards we can demonstrate the distinctiveness of individual institutions" (Nicoll, 2010).

This approach has risen from action taken by DEEWR and the ALTC, in the aftermath of the Bradley report, to explore the option of defining quality in terms of the expectations of graduate qualifications by discipline. The Bradley panel's recommendations in this respect reflected a response to concerns raised in a submission to a prior review of higher education:

"there are presently few objective reference points for knowing the intellectual standards of Australian degrees. At state forums and in case studies we talked with staff about assessment practices and standards. Staff often have difficulty explaining how they know about the standards of their degrees and are unable to point with confidence to formal processes for monitoring standards, particularly against external reference points" (James, McInnis, Devlin, 2002).

It was suggested in that submission that groups of academics formed around common field of study interests should be encouraged and supported to take responsibility for setting and monitoring broad standards at a national level (James, 2003). However, what may appear to be a simple idea could lead, after many torturous hours, to three possible outcomes: (i) agreement; (ii) compromise; (iii) disagreement. It is likely that any agreed statements would be so broad as to be useless, or so minimal as to be embarrassing. A compromised outcome is likely to be so detailed and conditional that it would be unworkable. Disagreement may not be the worst result.

It is entirely reasonable for universities to be expected to describe clearly, in their own terms, the aims and outcomes of their courses and programmes, what it is that students need to do to be

able to obtain degrees, and how the institution will provide them with the necessary facilities and opportunities to succeed. And it is appropriate that universities demonstrate their distinctiveness in doing so. External references can be helpful to universities in that activity so long as they are envisaged as guides for local adaptation:

"It is possible to agree on a range of standards as long as two main conditions are met:

- Define standards as principles or reference points, i.e as guides that require local interpretation and adaptation*
- See any set of standards (or principles) as an evolutionary framework that requires adaptation to a changing environment."* (Sursock, 2007).

5.9.2 Clarifying missions and goals

The May 2008 Budget Paper on the 'education revolution' included the following indication of intent:

"To build productive partnerships with universities, the Government has committed to the introduction of a new funding framework from 2010, using mission based compacts. The compacts are agreements between public universities and the Australian Government detailing public funding commitments and university obligations. They will be developed collaboratively with each university to recognise their individual missions and their multiple roles in modern societies, and will include appropriate accountability mechanisms." (Gillard, 2008).

The Government's approach to mission-based funding compacts with universities presents a curious mix of the principal-agent model and the mutual responsibility model of government-university relations discussed earlier. Nevertheless it offers an opportunity for the validation of fitness of purpose: the appropriateness and relevance of what a university seeks to achieve; alignment of offerings with strengths; consistency of effort with purpose; and the criteria for assessing effective delivery.

Clarification of institutional mission enables educational quality to be judged in terms of fitness to deliver stated program aims and objectives, rather than against notional quantitative norms.

5.9.3 Professionalising educational assessment

"if the learning outcomes of higher education are narrowly measured, as cost, capacity and convenience dictate, we risk narrowing the missions, subject matter taught, and diversity of the American system of higher education" (Shavelson, 2007).

As well as the challenges relating to the comparability of higher education qualifications, as discussed earlier, there are new challenges to the integrity of internal assessment of learning in higher education institutions. Assumptions underpinning previous assessment practices need to be revisited in view of the fragmentation of processes for the cultural induction of academic assessors, and multiple paths of student entry to higher education. Hence the need is seen to arise for a more explicit standards-based approach to institutional assessment; one that focuses on learning outcomes and not only inputs and processes:

"In circumstances, in which university entry pathways and the modes of student participation and engagement with learning resources diversify, student learning outcomes might come to provide the ultimate test and safeguard for standards" (James, 2003).

In Part 1 we encountered the OECD's 'Logic 1' line of argument: i. effectiveness needs to be measured in order to inform government decisions about funding and governance of higher education providers; ii. for effectiveness to be measured the purposes of higher education need to be made more explicit; iii. provider performance in relation to purposes needs to be based on student learning outcomes; iv.

learner performance in relation to outcomes needs to be standards-referenced v. learning outcomes need to be economy-relevant and competency-based; and vi. the main challenge is to work out how to measure the competencies properly. By this logic it becomes appropriate and theoretically feasible to compare the performance of different providers against a standard set of competencies expected of graduates for a given level of qualification.

Here we consider an alternative 'Logic 2' line of argument: i. diversity of students, modes of delivery and ways of learning put sharper focus on the assessment of learning outcomes; ii. assessment is a function of the academy; iii. but there has been a breakdown in academic norms for induction about assessment; iv. assessment needs to be professionalised; v. professional dialogue across the academy is a means of clarifying expectations of broad standards for assessment; vi. external references to standards exemplars can be helpful for the professional development of assessors; vii. but standards should be set by each institution according to its mission and goals, not by an external body; viii. external validation of internal assessments can be a helpful check that can add to community confidence and comparability. By this logic it is important to make assessment criteria and processes more robust and transparent, to professionalise the assessment function, and to improve assessment moderation and reporting.

The ultimate purpose of assessment is to validate learning outcomes, whether for diagnostic, formative or summative purposes (Malan, 2000). Improving the quality and consistency of assessment practice has become a priority for universities, given the changes to the nature of higher education discussed earlier. Indeed it is timely to consider a thorough review of assessment practices "supported by developmental activities aimed at improving the robustness and consistency of assessment and classification practices within and between institutions", together with clarification and explanation of the reasons for, and meaning of, variation in particular approaches to assessment (Brown, 2010a).

In addition to defining expectations of graduate capabilities, and improving student assessment, attention also needs to be given to the external verification of assessed student work and assessment tasks. Go8 universities are developing a modified form of the British external examining system, through partnering with like institutions nationally and internationally, and encompassing peer appraisals of curriculum design and assessment strategies as well as review of assessment tasks and student work. Greater attention is also being given to obtaining structured feedback from graduate employers and professional bodies about the performance of graduates.

Making professional judgement more transparent is more consistent with university responsiveness than replacing judgement with highly specified common standards.

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5.9.4 Reporting performance

It is evident that the community expects more comprehensive, reliable and comparable reporting by higher education institutions of the results they achieve. A combination of reporting against common and customised indicators is the most sensible approach, as it allows people to see similarities and dissimilarities in institutional orientations, offerings and outcomes. The US College Portrait and

the European U-Map reporting frameworks allow institutional differences to be portrayed alongside reporting of institutional characteristics and performance against common measures. The necessary subtlety is to differentiate between a standard set of measures and a set of measures of standards. The latter can distinguish differences in the standards that institutions set for themselves, whereas the former extinguishes distinctiveness. Hence it is necessary to contextualise performance indicators, with reference to institutional purposes, student characteristics and social circumstances, so that indicators such as student progression, degree attainment, and employment can be appreciated.

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5.10 Conclusions

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.

However, the Australian Government's proposed approach to higher education standards-setting, quality assessment and performance reporting 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.

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.

National 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.

Given the growing complexity and diversity of higher education, and the varying information needs of students, let alone the needs of other stakeholders, 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.

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 and 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. It is good policy practice, consistent with long-standing democratic conventions, to separate standards setting from their enforcement and monitoring

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. Information standards could continue to be developed by government departments, as for the *MyUni* website, compacts and performance funding reporting requirements. 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, and introduce more comprehensive re-registration requirements, according to the principle of regulation proportional to risk.

A standards-based approach to provider registration and re-registration is essential. The standards need to be set and applied on a nationally consistent basis. Higher education provider registration standards should continue to be set by the inter-ministerial council of the Commonwealth, states and territories. TEQSA should function as the national regulator of provider conformity with threshold standards of operation. It will be important for TEQSA to monitor regularly the compliance of new providers with their registration requirements.

Clear definitions of standards and standards-based arrangements, along with answers to the specific questions raised at 5.8.4 above, must be provided before the TEQSA legislation is finalised.

3. Re-open the revision of the Australian Qualifications Framework (AQF):

The revised AQF as proposed by the AQFC in October 2010 is too narrow, parochial and prescriptive (AQFC, 2010b). The AQFC is proposing a unified model that exists nowhere else and runs contrary to best practice principles, as noted at 4.4 above. Imposing from above an ambitious reform model flies in the face of all the available evidence regarding change management in respect of NQFs.

The proposed new level 10 descriptor represents a weakening of the current Doctoral level descriptor (the current highest level qualification) through the removal of reference to demonstrating deep research skills which are assessed against international standards.

The overly-tight limiting of qualifications types and titles to single levels reduces the usefulness and credibility of the AQF. Flexibility in relation to titling of awards is necessary to allow internationally recognised qualifications to be offered in response to student demand, both domestic and international.

Prohibiting various qualifications titles, long offered by universities and funded by the Australian Government, reduces the choices and pathways available to students.

If the AQF were to be included within the statute defining TEQSA's regulatory powers, such that the AQF became a regulatory instrument rather than a descriptive reference, it would represent an unacceptable step backwards in eroding the self-accrediting status of Australian universities.

These issues could be overcome by maintaining a focus on the learning outcomes at each level while allowing more flexibility for qualification types to span across two adjacent levels. Bachelor degrees should be able to be offered at both levels 7 and 8, Master degrees at levels 8 and 9 and Doctor degrees at levels 9 and 10. This approach will more accurately reflect current practices and allow for future developments.

Information about the alignment of qualifications types and titles with AQF levels can be documented in course and marketing materials, graduation statements and transcripts.

If this approach is not accepted, then the basic proposal to move from a sectoral to a unified AQF should be rejected. 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 (VET) qualifications. It is premature to combine higher education within a unified framework when the policy framework for VET is itself unsettled.

4. Customise performance-related funding:

Performance funding should be related to the circumstances and goals of each university. Standardised tests and value added measures are invalid and inappropriate for performance improvement purposes. There has been 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. The most sensible future course is to allow universities to (a) select from a menu of common indicators those which best suit their purposes and circumstances, and (b) identify customised indicators more tightly related to their specific objectives.

5. Improve transparency about institutional differences:

Whereas some advisers suggest that students need to know what is common in higher education performance, it is probable that most students want to know how various learning opportunities differ. Government should require all higher education institutions to publish profiles on the *MyUni* website 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.

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.

6. 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.

7. 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, while all the available evidence suggests the Government favours a formulaic and uniform policy approach.

Astonishingly, the TEQSA Interim Chair is proposing to proceed with the accountability for quality agenda in a closed rather than open manner, as indicated in correspondence to the Go8 on 11 October 2010:

"The legislation to establish TEQSA is on the program for introduction to the parliament before the end of 2010 and the Department of Education, Employment and Workplace Relations (DEEWR) is responsible for its drafting. There will be an opportunity for select stakeholders to provide feedback on the legislation through a closed consultation process before it is introduced into Parliament".

The matters at stake are too significant and controversial for such a myopic and potentially manipulable approach. The tightly balanced federal parliament also has a right to expect a better policy process; otherwise it may refer the TEQSA Bill to scrutiny through its own procedures. If trust is to be rebuilt, and sustainable reform is to be achieved, there is no viable option other than a fully open dialogue. That means, at the very least, the issuing of a comprehensive discussion paper ahead of any draft legislation.

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Attachment A.

Australian Higher Education Graduate Statement (Sample)

The Australian Higher Education Graduation Statement is provided by Australian higher education institutions to graduating students on completion of the requirements for a particular higher education award. It provides a description of the nature, level, context and status of studies that were pursued by the individual named. Its purpose is to assist in both national and international recognition of Australian qualifications and to promote international mobility and professional recognition of graduates.

1. the graduate

Name

Student number

2. the award

Name of award

Doctor of Philosophy

The field of study being

Clinical Psychology

Detail

The completion of a Doctor of Philosophy award normally takes between three and four years of full-time study or part-time equivalent and is conducted in English. This award is made principally on the basis of a research thesis comprising original written work, normally of up to 100,000 words, that is independently assessed by no fewer than two examiners where at least one examiner is external to the University. In some disciplines an alternative to a written thesis may be submitted and assessed. Admission to a Doctor of Philosophy program is normally granted to applicants holding a Master by research degree or a Bachelor degree with First Class Honours or Second Class Honours Division A. Admission can be granted to applicants who demonstrate a background equivalent to these qualifications.

Features

The Doctor of Philosophy program at ANU consists primarily of research which is supervised by a panel of researchers. The program contains a number of key research milestones including a research proposal, annual reports, an oral presentation and research integrity training in addition to the main thesis. Significant fieldwork and some coursework is a common component of a Doctor of Philosophy. Doctor of Philosophy students may be given the opportunity to attend or present at relevant national/international conferences or to publish articles based on their research. They may also be offered teaching opportunities such as lecturing and/or tutoring.

3. awarding institution

The Australian National University is a research intensive education institute established by an Act of the Australian Parliament on 1 August 1946. For more information about The Australian National University visit www.anu.edu.au

certification

4. graduate's academic achievements

Doctor of Philosophy awarded 10 December 2009

Clinical Psychology

Course Code	Course Title	Units	Mark	Grade
2005	FIRST SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	0	RC	RC
PSYC8101	Clinical Coursework I	12	CRS	CRS
PSYC8201	Clinical Field Placement I	6	CRS	CRS
PSYC8301	Clinical Research I	6	CRS	CRS
2005	SECOND SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	0	RC	RC
PSYC8102	Clinical Coursework II	12	CRS	CRS
PSYC8202	Clinical Field Placement II	6	CRS	CRS
PSYC8302	Clinical Research II	6	CRS	CRS
2006	FIRST SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	0	RC	RC
PSYC8103	Clinical Coursework III	12	CRS	CRS
PSYC8203	Clinical Field Placement III	6	CRS	CRS
PSYC8303	Clinical Research III	6	CRS	CRS
2006	SECOND SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	0	RC	RC
PSYC8104	Clinical Coursework IV	12	CRS	CRS
PSYC8204	Clinical Field Placement IV	6	CRS	CRS
PSYC8304	Clinical Research IV	6	CRS	CRS
2007	FIRST SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	24	RC	RC
2007	SECOND SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	24	RC	RC
2008	FIRST SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	24	RC	RC
2008	SECOND SEMESTER			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	24	RC	RC
2009	QUARTER 1			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	12	RC	RC
2009	QUARTER 2			
HLTH9550F	PhD - Research Course Centre for Mental Health Research	5	CRS	CRS

Thesis

The University of Canberra has received a copy of the thesis submitted by the candidate. The thesis is available for review at the University of Canberra Library.

Special achievements, recognition and prizes

Scholarships

2005

2005

National Health and Medical Research Council Fellowship

5. description of the **australian higher education system**

Introduction

The Australian higher education system consists of independent, self-governing public and private universities and higher education institutions that award higher education qualifications. All higher education providers must be listed on the Australian Qualifications Framework Register of Recognised Education Institutions and Authorised Accreditation Authorities in Australia. This register is developed under instructions from Commonwealth, State and Territory Education and Training Ministers (See: <http://www.aqf.edu.au>).

Qualifications

The Australian Qualifications Framework (AQF) is a single national and comprehensive system of qualifications offered by higher education, vocational education and training, and secondary schools. The AQF comprises a set of national qualifications (ie awards), titles and qualification descriptors (See accompanying diagram). The AQF specifies the main criteria for defining qualifications based on the general characteristics of learning outcomes at each qualification level. The main qualifications awarded by higher education institutions are bachelors, masters and doctoral degrees, and graduate certificates and graduate diplomas. Research higher degrees at masters and doctoral level are normally assessed by external examiners. The higher education qualifications descriptors are periodically reviewed against best national and international practice. Guidelines for each qualification title are published in the Australian Qualifications Framework Implementation Handbook (<http://www.aqf.edu.au>).

Admission

Requirements for admission to particular programmes are set by individual universities and colleges that generally provide a range of routes for entry and admit those students considered to have potential to successfully complete programmes of study. Admission of school leavers to undergraduate programmes typically is on the basis of the level of achievement in Year 12 secondary education, although some institutions and programmes also use interviews, portfolios or demonstrated interest or aptitude. Most institutions also provide alternative entry provisions via bridging or foundation programs for mature age students or other special provisions. Admission to postgraduate programmes is generally based on the level of achievement in previous higher education studies; in most cases, admission to PhD programmes is based on high achievement in a research masters degree or in a bachelors degree with first class honours or second class honours division A.

Quality

Australia has an international reputation for high quality education that is built on best practice in accreditation, quality recognition, quality assurance, and student consumer protection. All higher education institutions must be accredited by State and Territory Governments in accordance with strict criteria detailed in the National Protocols for Higher Education Approval Processes. These Protocols are nationally agreed principles that ensure consistent criteria and standards across Australia in such matters as the recognition of new universities, the operation of overseas higher education institutions in Australia, and the accreditation of higher education courses offered by institutions other than universities (See: <http://www.deewr.gov.au/HigherEducation/Pages/default.aspx>).

All institutions receiving Australian Government financial support must meet quality and accountability requirements that are set out in the Higher Education Support Act 2003. The Australian Government also uses a range of tools to measure and monitor the quality of outcomes, while the interests of international students are protected by the Education Service for Overseas Students Act 2000 and its National Code, providing tuition and financial assurance and a consistent approach to institution registration.

Australian Universities are autonomous bodies that are responsible for managing quality through internal accreditation processes and commitment to codes of practice. Universities and other higher education providers are required by legislation to have in place appropriate quality assurance processes. These processes are periodically audited by the Australian Universities Quality Agency (AUQA).

AUQA is Australia's principal national quality agency for higher education. It is an independent body that undertakes quality audits of higher education institutions and accreditation authorities (See: <http://www.auqa.edu.au>). AUQA publicly reports on performance and outcomes, assists in quality enhancement and advises on quality assurance.

Australian Qualifications Framework

Schools Sector Qualifications	Vocational Education and Training Sector Qualifications	Higher Education Sector Qualifications
		Doctoral Degree
		Masters Degree
	Vocational Graduate Diploma	Graduate Diploma
	Vocational Graduate Certificate	Graduate Certificate
		Bachelor Degree
	Advanced Diploma	Associate Degree, Advanced Diploma
	Diploma	Diploma
Senior Secondary Certificate of Education (SSCE)	Certificate IV	
	Certificate III	
	Certificate II	
	Certificate I	

THE AUSTRALIAN NATIONAL UNIVERSITY

AUSTRALIAN HIGHER EDUCATION GRADUATION STATEMENT

EXPLANATION OF GRADES AND CODES

KEY TO GRADES AND CODES					
HD	High Distinction	80 - 100	H1	First Class Honours	80 - 100
D	Distinction	70 - 79	H2A	Second Class Honours Division A	70 - 79
CR	Credit	60 - 69	H2B	Second Class Honours Division B	60 - 69
P	Pass	50 - 59	H3	Third Class Honours	50 - 59
CRS	Course Requirements Satisfied	ungraded pass	IP	In progress (continuing course)	
PS	Pass at supplementary exam	50	KU	Continuing course	
HLP	Higher Level Performance	high level pass	EE	Enrolled elsewhere	
N	Fail	0 - 49	EXE	Exemption external (no unit value)	
NCN	Not complete/Fail	not graded	EXI	Exemption internal (no unit value)	
WD	Withdrawn without failure	not graded	RC	Research continuing	
WN	Withdrawn with failure	not graded	STE	Status external (external credit)*	
WL	Withdrawn late without failure	not graded	STI	Status internal (internal credit)*	

This explanation is current at 1 July 2009. Subsequent amendments and further details of assessment notations are available at <http://rss.anu.edu.au>

*Results for internal status credited to the specified award are not recorded on this Graduation Statement. Please see the graduate's Transcript of Academic Record for these results. Results for any external status credited cannot be provided by ANU.

UNIT VALUES AND EQUIVALENCIES

The majority of courses offered at ANU are valued at 6 units. The normal maximum load in a semester or half-year is 24 units (normally 4 courses). Undertaking 18-24 units per semester is considered a full-time study load.

ANU considers 30 European Credit Transfer System (ECTS) credits as equivalent to 24 ANU units.

COURSE INFORMATION

Details of the syllabus for individual courses listed on this Australian Higher Education Graduation Statement may be found in the relevant University Handbook for the year indicated. Alternatively, course information may be obtained from the relevant academic area.

SEMESTERS AND SESSIONS

COURSEWORK PROGRAMS		RESEARCH PROGRAMS	
First Semester	February - June	First Semester	1 January - 30 June
Second Semester	July - November	Second Semester	1 July - 31 December
Summer Session	January - March	Quarter 1	January - March
Autumn Session	April - June	Quarter 2	April - June
Winter Session	July - September	Quarter 3	July - September
Spring Session	October - December	Quarter 4	October - December

TRANSCRIPT OF ACADEMIC RECORD

The information contained within this Australian Higher Education Graduation Statement pertains to the specified award only. For a complete history of academic results achieved at ANU, or results for courses granted as internal status, please see the graduate's Transcript of Academic Record.

GLOSSARY OF TERMS

TERMINOLOGY	EXPLANATION
Award	A certificate, diploma, degree, graduate certificate or graduate diploma, conferred by the University to a person upon the completion of an academic program leading to an award, for example a Bachelor of Arts. The award is represented by a testamur and is presented to a graduate upon graduating.
Course	A classification of achievement based on the final mark. For example, High Distinction (HD) indicates a final mark between 80 and 100.
Grade	A certificate, diploma, degree, graduate certificate or graduate diploma, conferred by the University to a person upon the completion of an academic program leading to an award, for example a Bachelor of Arts. The award is represented by a testamur and is presented to a graduate upon graduating.
Mark	A number indicating a student's performance in an assessment activity or a course. Raw marks, which may be scaled, become final marks after approval by the Delegated Authority. Marks range from 0 - 100.
Program	A structured sequence of study, undertaken in one or more colleges of the University, normally leading to the awarding of a degree, diploma or certificate. Programs are controlled by one or, in the case of combined programs, two academic authorities.
Status	Students admitted to a program at the University, or transferring between programs in the University, on application, may be granted status (credit) in the new program on the basis of previous tertiary studies.
Unit	This is an indicator of the value of a course within the total program. Most courses are valued at 6 units.

DOCUMENT SECURITY

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Attachment B.

US College Portrait (Example)

The Ohio State University

Columbus, OH • 614-292-1311

<http://www.osu.edu>



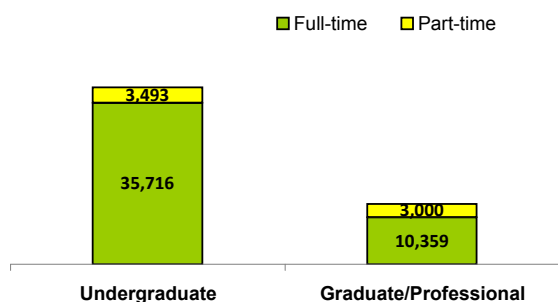
Founded in 1870, The Ohio State University is a world-class public research university and the leading comprehensive teaching and research institution in the state of Ohio. With more than 52,000 students enrolled at its main Columbus campus, 18 colleges and 170 majors, the university offers its students exceptional breadth and depth of opportunity in the liberal arts, the sciences and the professions. A national research powerhouse, the university ranks seventh among all public universities in research expenditures and a remarkable second place when it comes to industry-sponsored research.

Student Characteristics (Fall 2007)

TOTAL NUMBER OF STUDENTS

52,568

Student Level and Enrollment Status



UNDERGRADUATE PROFILE

Total 39,209

Gender

Women	18,291	47%
Men	20,918	53%

Race/Ethnicity

African American / Black	2,742	7%
American Indian / Alaskan Native	152	0%
Asian / Pacific Islander	2,031	5%
Hispanic	1,032	3%
International	1,065	3%
White	31,341	80%
Race/Ethnicity Unknown	846	2%

Geographic Distribution (Degree-Seeking)

Ohio	89%
Other US States & Territories	9%
Other Countries	2%

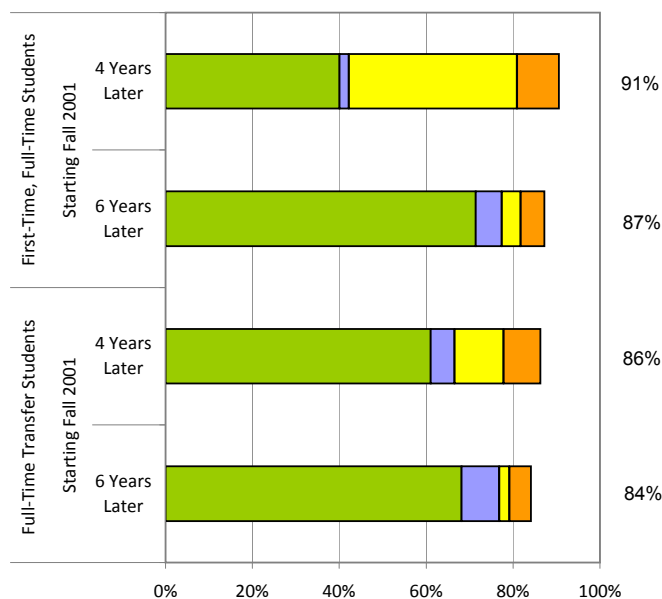
Age (Degree-Seeking)

Average Age	21
Percent of Undergraduates Age 25 or Older	8%

Undergraduate Success and Progress Rate

[More](#)

■ Graduated from OSU
■ Graduated from other Institution
■ Still Enrolled at OSU
■ Still Enrolled at other Institution



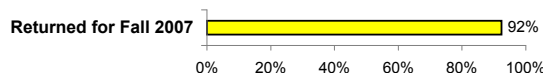
A 91% four-year success and progress rate means that 91% of students starting in Fall 2001 either graduated or are still enrolled at a higher education institution four years later.

Counts for the Fall 2001 entering class shown in the graph above.

- 5,964 First-Time, Full-Time Students
- 1,604 Full-Time Transfer Students

[CLICK HERE](#) for Detailed Success & Progress Rate Tables

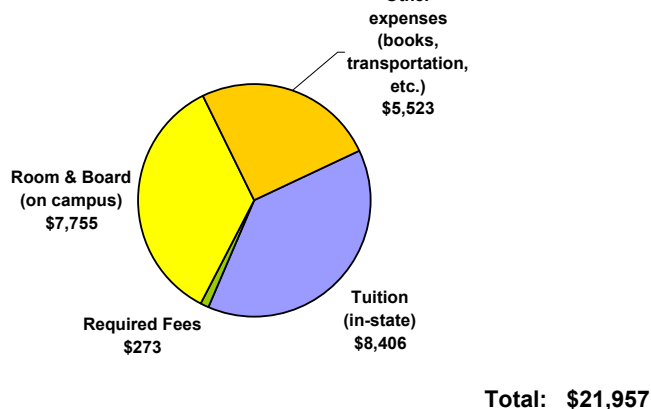
Retention of Fall 2006 First-Time, Full-time Students



College Portrait
of Undergraduate Education

Voluntary System of Accountability

One of the strengths of U.S. higher education is the broad range of diverse institutions, each with its own distinctive mission. We encourage you to check out college web sites and visit campuses to get a more complete picture of the opportunities available to you!

Costs of Attendance and Financial Aid[More](#)**Typical Undergraduate Costs per Year Without Financial Aid for Full-Time, In-State Students (2007-08)**[CLICK HERE](#) for typical out-of-state costs and any discipline-specific tuition

The cost to attend varies based on the individual circumstances of students and may be reduced through grants and scholarships.

[CLICK HERE](#)
To get a cost estimate for
students like you!

Financial Aid Awarded to Undergraduates (Fall 2007)**Overall Financial Aid**

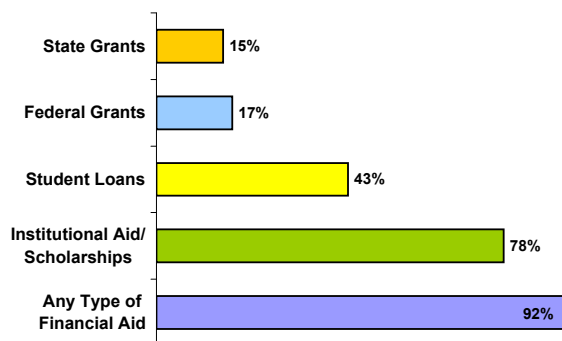
- 73% of Fall 2007 full-time undergraduates received financial aid of some type including need-based loans, work study, and non need-based scholarships.

Annual Need-Based Scholarships & Grants

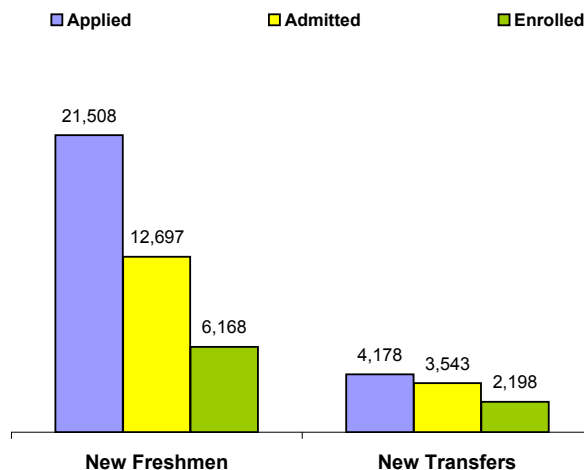
- 39% of Fall 2007 full-time undergraduates received need-based grants or scholarships; the average award for the year was \$6,480.

Annual Need-Based Loans

- 50% of Fall 2007 full-time undergraduates received need-based work-study and/or loans (not including parent loans); the average loan for the year was \$5,530.

Percent of Fall 2006 First-Time Students Receiving Each Type of Financial Aid

NOTE: Student may receive aid from more than one source.

Undergraduate Admissions[More](#)**Academic Preparation of New Freshman****Test(s) Required for Admission:**

Middle 50% of Test Score Range	ACT	SAT
Composite	25-29	
Math	25-30	580-680
English	24-30	
Critical Reading		550-650

50% of admitted students have test scores within the ranges listed, 25% have scores above, and 25% have scores below.

Percent in top 25% of High School Graduating Class:	89%
Percent in top 50% of High School Graduating Class:	99%
Average High School GPA (4-point scale)	-

Degrees and Areas of Study[More](#)**Degrees Awarded at OSU in 2006-07**

Bachelor's	9,067
Master's	2,635
Doctoral	667
Professional (e.g., Law, Medicine)	834
Total	13,203

Areas of Study with the Largest Number of Undergraduate Degrees Awarded in 2006-07

Business	16%
Social sciences	15%
Family and consumer sciences	8%
Engineering	7%
Health professions and related sciences	7%
All other degree areas	47%
Total	100%

[CLICK HERE](#) for a list of undergraduate and graduate programs

The Buckeyes Community

A big university means a big opportunity, and Ohio State prides itself on offering about any academic or extracurricular opportunity a student could dream of: 170 majors, 800+ student organizations; 120 study abroad programs internship and research opportunities in every college; 60+ service-learning courses; multiple Honors and Scholars programs, and 40+ learning communities.

To help new students successfully navigate these opportunities, Ohio State designed great support services and a First Year Experience (FYE) program rated by US News as one of the best.



Study at OSU

Classroom Environment

Students per Faculty	13 to 1
Undergraduate classes with fewer than 30 students	62%
Undergraduate classes with fewer than 50 students	81%

Full-Time Instructional Faculty

Total Faculty	3,118
% Women	31%
% from Minority Groups	19%
% with Highest Degree in Field	99%

Carnegie Classification of Institutional Characteristics

Basic Type

Research Universities (very high research activity)

Size and Setting

Large four-year, primarily residential

Enrollment Profile

High undergraduate

Undergraduate Profile

Full-time four-year, more selective, higher transfer-in

Undergraduate Instructional Program

Balanced arts & sciences/professions, high graduate coexistence

Graduate Instructional Program

Comprehensive doctoral with medical/veterinary

NOTE: Institutional classifications based on the Carnegie 2005 edition.

[CLICK HERE](#) for more information on Carnegie Classifications.

Student Housing

[More](#)

92% of new freshmen live on campus

24% of all undergraduates live on campus

Campus Safety

[More](#)

Ohio State's commitment to safety and security throughout the university community is well documented and exhibited every day by our professional public safety personnel, our use of security related technology, and overt support by the university's senior administrators. Our Department of Public Safety proudly traces its history to the first Night Watchman appointed in 1890 and the first Day Watchman hired in 1909.

OSU students and their parents can rest assured that the foundations for a free and open academic setting in which students can learn, live, and grow are being safeguarded.

[CLICK HERE](#) for Campus Crime Statistics report.

Future Plans of Bachelor's Degree Recipients

Data used to build graph are not yet available

[CLICK HERE](#) for information on survey administration, sample, and response rate.

Student Experiences and Perceptions

Students who are actively involved in their own learning and development are more likely to be successful in college. Colleges and universities offer students a wide variety of opportunities both inside and outside the classroom to become engaged with new ideas, people, and experiences. Institutions measure the effectiveness of these opportunities in a variety of ways to better understand what types of activities and programs students find the most helpful.

[CLICK HERE](#) for examples of how OSU evaluates the experiences of its students.

In addition, institutions participating in the VSA program measure student involvement on campus using one of four national surveys. Results from the one survey are reported for a common set of questions selected as part of VSA. Following are the selected results from the 2006-07 National Survey of Student Engagement (NSSE). The questions have been grouped together in categories that are known to contribute to student learning and development. The results reported below are based on the responses of seniors who participated in the survey.

[CLICK HERE](#) for information on the NSSE survey.

Group Learning Experiences

94% percent of seniors worked with classmates on assignments outside of class.

55% of seniors tutored or taught other students

32% of seniors spent at least 6 hours per week participating in co-curricular activities such as student organizations and intramural sports

Active Learning Experiences

81% of seniors spent at least 6 hours per week preparing for class

17% of seniors worked on a research project with a faculty member

57% of seniors participated in an internship, practicum, or field experience

57% of seniors participated in community service or volunteer work

13% of seniors participated in study abroad

95% of seniors made at least one class presentation last year

Institutional Commitment to Student Learning and Success

94% of seniors believe this institution provides support for student success

69% of seniors rated the quality of academic advising at this institution as good or excellent

60% of seniors reported that this institution provided help in coping with work, family and other non-academic responsibilities

93% of seniors reported working harder than they thought they could to meet an instructor's standards or expectations

Student Satisfaction

84% of seniors would attend this institution if they started over again

87% of seniors rated their entire educational experience as good or excellent

82% of seniors reported that other students were friendly or supportive

Student Interaction with Campus Faculty and Staff

52% of seniors believed that the campus staff were helpful, considerate, or flexible

72% of seniors believed that faculty are available, helpful, or sympathetic

92% of seniors reported that faculty members provided prompt feedback on their academic performance

66% of seniors discussed readings or ideas with faculty members outside of class

Experiences with Diverse Groups of People and Ideas

62% of seniors reported that they often tried to understand someone else's point of view

89% of seniors reported their experience at this institution contributed to their understanding people of other racial and ethnic backgrounds

57% of seniors often had serious conversations with students of a different race or ethnicity

Student Learning Outcomes

All colleges and universities use multiple approaches to measure student learning. Many of these are specific to particular disciplines, many are coordinated with accrediting agencies, and many are based on outcomes after students have graduated. In addition, those institutions participating in the VSA measure increases in critical thinking, analytic reasoning, and written communication using one of three tests.

Student Learning Assessment at OSU

Ohio State is committed to effective assessment of student learning consistent with the Higher Learning Commission's 2003 Statement on Assessment of Student Learning. Assessment is a broad-based activity that occurs at a number of levels across the university. Some assessment activities are carried out at the institutional level, others are specific to the success of our general education curriculum (GEC), and still others are specific to major program goals. Regardless of the level, assessment is viewed as an ongoing process whereby outcomes and core values are identified, evidence is collected and evaluated, and modifications are made to improve student learning.

[CLICK HERE](#) for examples of student learning assessment and outcomes at OSU

Pilot Project to Measure Core Learning Outcomes

Results from the pilot project using one of the three learning outcomes tests are not yet available.

Attachment C.

University of South Australia Teaching and Learning Academic Standards Framework 2009

University of South Australia
Teaching and Learning Academic Standards Framework
March 2009

Preamble

This paper describes a UniSA Teaching and Learning Academic Standards Framework that explicates standards from existing policies, procedures, guidelines and codes of good practice and establishes a Framework of relevant internal and external performance benchmarks. The Framework acts as a nexus between the University's *Vision, Mission and Values*, our aspirations in teaching and learning as articulated in the *Strategic Plan* and the *Teaching and Learning Framework*.

Academic Policy and Program Review Committee and academic policy writers in the University will be guided by the academic standards when drafting new and reviewing existing academic policies. The Framework provides a deeper level of analysis of teaching and learning performance cascading from the Corporate Key Performance Indicators. The Teaching and Learning Committee will be guided by the Framework and the related scorecard of performance when identifying teaching and learning priorities which flow into the Divisions' and Learning and Teaching Unit's teaching and learning planning activities.

UniSA's distinctive learning environment

The University's Act requires it to provide tertiary education for the benefit of industry, commerce, the professions and the wider community and specifically to meet the needs of Indigenous people and others who have faced educational disadvantage.

The University's *Strategic Plan* describes the University's aspirations for teaching and learning as follows:

The University will flexibly provide student-centred learning experiences that educate professionals and develop Graduate Qualities, embracing excellence, equity and diversity as core values.

The Teaching and Learning Framework is centred on a commitment to the development of graduate qualities and provides the concept of *student engagement* as an indication to staff of how to approach *student centredness*. Engagement is to be delivered through experiential learning and this has been defined at UniSA as:

- Practice based learning – authentic and active learning in workplaces and in the classroom
- Teaching-research nexus - the linking of teaching and research in programs and courses
- Service learning – volunteer work as a community service, with opportunities to reflect and develop key Graduate Qualities.

These combinations of requirements, aspirations and commitments have driven the development of the UniSA Teaching and Learning Academic Standards Framework.

UniSA involvement in national academic standards projects

UniSA was an active participant in two major national projects to develop frameworks for identifying academic standards for teaching and learning which could be benchmarked across institutions; the ATN Academic Standards project and the ALTC's Teaching Quality Indicators project.

The first project involved the ATN universities and the Australian Council for Education Research (ACER) was retained to develop a framework that could be potentially applied across the ATN. The ATN project focused solely on teaching and learning rather than, for example, research, human resources or financial variables. The ACER framework (ATN '*Academic Standards Model*' report, July 2007) consists of the following dimensions:

- An indicator framework, which identifies indicators at input, process and output phases, and across diverse contexts (e.g. individual, School/Department/Faculty, Portfolio; institutional);
- A suite of measures to support these indicators; and
- An approach for gathering data on each of these measures.

The framework was derived from a similar model presented by the OECD (OECD 'Education at a Glance', 2005).

The intention of the second project, the ALTC's Teaching Quality Indicators project (TQI), was to provide a comprehensive framework from which individual universities could select elements most appropriate to their individual circumstances. Like the ATN framework, the ALTC's model emphasises teaching and learning. The resultant framework consists of the following dimensions:

- Institutional climate and systems;
- Diversity and inclusivity;
- Engagement and learning community; and
- Assessment.

'A review of Australian and international quality systems and indicators of learning and teaching report', August 2007

Identifying a Standards Framework for UniSA

To guide development of a Teaching and Learning Academic Standards Framework, the AUQA definition of a standard has been adopted:

'A standard is an agreed specification or other criterion used as a rule, guideline, or definition of a level of performance or achievement.'

Any framework for teaching and learning standards adopted by UniSA must reflect the position of the organisation as an innovative institution with a distinctive profile and which values scholarship, engagement, equity and social justice, sustainability, innovation and openness. It must attend to its aspirations to be dynamic, progressive and responsive to the range of stakeholders who have legitimate interests in higher education and its graduates and it must also champion the elements of education that UniSA has defined as the factors which shape our thinking and the way we go about planning for the future. i.e.:

1. The continuation of the centrality of **graduate qualities** as a fundamental objective of education, supported by appropriate program and assessment design;
2. The **active engagement of students** in their learning experiences by the provision of practice-based and service learning and exposure to research methods and outcomes;
3. The provision of a **flexible learning environment**.

Teaching and Learning Framework (Academic Board, June 2007)

Neither of the national approaches are ideal in the context of what UniSA has expressed its values as an organisation and subsequently articulated in its approach to teaching and learning. Therefore, a framework which adapts the principles and outcomes of the ATN and ATLC projects and applies these to UniSA's Teaching and Learning Framework has been developed by the University's Teaching and Learning Committee (TALC). The work of the TALC has also been influenced by the approach to a bespoke framework at Curtin University of Technology.

As teaching and learning is primarily influenced by factors that occur at the level of the individual student, the individual academic staff member and within the curriculum, excellence is pursued within each of these levels and statements of attainment are required as a guide to indicators of performance. The quality of the educational experience can also be examined at different stages in the student, staff and program life-cycle creating a matrix of indicators and measures. The University clearly acknowledges that professional staff and the broader infrastructure of the university also have roles to play in ensuring the quality of the teaching and learning that occurs. This version of the framework acknowledges these contributions and this contribution will be further detailed in subsequent versions.

As a first step, UniSA's Teaching and Learning Academic Standards Framework specifies an attainment statement for the three levels of *Students*, *Academic staff* and *Curriculum* (Tables 1-3). These statements have been abstracted from the University's long standing academic codes of good practice, policies, guidelines, procedures and regulations which articulate clear accountabilities and many of which incorporate

performance measures. As such, they demonstrate the intent of the university in producing quality teaching and learning and the underpinning key policies, procedures, guidelines and processes, and external reference points that support the intent.

Appendix 1 has taken these statements and developed the full academic standard for each intent. This involved developing the indicators that a particular policy or procedure is implemented and the measures used to monitor the success or otherwise of the approach.

Table 1: Coursework students

	UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)
1.	The University observes all legislation and national codes relevant to the provision of education to students; it recognizes the student's legal rights, including Intellectual Property Rights, and upholds privacy principles.	<ul style="list-style-type: none"> • University of SA Act (1990) • University of SA By-laws • University of SA Statutes • HESA (2003) • ESOS Act (2000) • MCEETYA National Protocols • Code of Good Practice: Student Behaviour (2007)
2.	Students are provided with consistent policies and efficient procedures for admission, enrolment, progression and completion, and have timely access to advisors and all relevant program information.	<ul style="list-style-type: none"> • UniSA Codes, Guidelines and Procedures webpage • UniSA Policy webpage
3.	All UniSA students have access to clearly articulated policies and transparent processes and outcomes for the administration of grievances and appeals.	<ul style="list-style-type: none"> • UniSA Codes, Guidelines and Procedures webpage • UniSA Policy webpage • C17.0 Resolution of student grievances
4.	The University provides opportunities and support to ensure students have representation on University committees to enable participation in decision-making.	<ul style="list-style-type: none"> • University of SA Act (1990) • Academic Board Charter • UniSA/UniLife Service Agreement
5.	Students may enter the University upon demonstration of academic merit with consideration of access and equity and with the provision of recognition of prior learning.	<ul style="list-style-type: none"> • Selection and entry to programs (A-18.10) • Students with disabilities website • Recognition of Prior Learning (A-13.11) • Enrolment policy (A - 48.5)
6.	Students are provided with alternative pathways to promote access which take into account the student's ability to successfully complete the requirements of the program.	<ul style="list-style-type: none"> • Selection and entry to programs (A-18.10) • Students with disabilities • Recognition of Prior Learning (A-13.11) • Portfolio entry • USANET Special Access Scheme • UniSA-PAL
7.	Students' prior learning is recognised through an academically defensible process which takes into account the student's ability to successfully complete the remaining requirements of the program.	<ul style="list-style-type: none"> • Recognition of Prior Learning (A-13.11) • Guidelines for the implementation of Recognition of Prior Learning • Credit assessor
8.	Students will have access to core courses and other requirements to enable	<ul style="list-style-type: none"> • Domestic Program Approval and

	program completion within the expected timeframe.	<ul style="list-style-type: none"> • <u>Amendment Guidelines</u> • Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)
9.	Modified teaching and learning arrangements are provided to students based upon special needs including unexpected or exceptional circumstances.	<ul style="list-style-type: none"> • <u>Disability Access Plan</u> • <u>Assessment policy and procedures manual</u> • <u>Discrimination and Harassment Grievance Procedures (Students) (2005)</u> • <u>Inclusive Language (C 1.4)</u> • <u>Students with disabilities (C- 7.3)</u> • <u>Anti Racism (C-21.2)</u> • <u>Equal Opportunity (C-2.4)</u> • <u>Sexual Harassment (C-12.3)</u>
10.	Students are provided with constructive and timely feedback on their academic achievements and progress.	<ul style="list-style-type: none"> • <u>Assessment policy and procedures manual</u> • <u>Guidelines for examinations</u>
11.	Students are supported to achieve their learning goals through a variety of activities and experiences which promote social inclusion and engagement. This includes student-led activities promoting community involvement, sporting achievement and leadership development.	<ul style="list-style-type: none"> • Learning connection • New students website • UniSA/UniLife service agreement • Student Ambassadors • <i>Extension type experiences</i>
12.	Culturally-appropriate learning support is available for Indigenous students.	<ul style="list-style-type: none"> • DUCIER
13.	International students are supported to adjust to study and life in Australia, to achieve their learning goals and to achieve satisfactory program progress.	<ul style="list-style-type: none"> • <u>Learning and Teaching Unit International student services</u>
14.	There is parity between the international experience and the onshore program experience ensured through contracts for collaborative programs.	<ul style="list-style-type: none"> • <u>Transnational Contacts and Agreements</u> (logon required) • <u>Transnational Quality Framework Manual</u> (logon required) • <u>Transnational Quality Records</u> (logon required) • <u>International Institutional Agreement (logon required)</u>
15.	Professional and personal development activities designed to increase career management skills and opportunities, and enhance transition from study to work, are offered to students.	<ul style="list-style-type: none"> • <u>Careers Services website</u> • <u>My Career Plan (special logon required)</u>
16.	UniSA graduands meet the prescribed requirements for the coursework award.	<ul style="list-style-type: none"> • <u>Enrolment policy (A - 48.5)</u> • <u>Graduation and Records (A- 51.1)</u> • <u>Domestic Program Approval and Amendment Guidelines</u> • <u>Australian Qualifications Framework</u>

Table 2: Academic staff (including sessional staff)

	UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)
1.	The University recruits and selects academic staff the organisation needs to achieve its strategic directions and who demonstrate attributes that are consistent with the organisation's directions and culture.	<ul style="list-style-type: none"> • HR-27 staff recruitment and selection
2.	All academic staff are academically competent in their discipline areas.	<ul style="list-style-type: none"> • Procedures for the Appointment of Academic Staff Level B and above without Doctoral qualifications • Guidelines for Academic Staff for Commencement and Completion of Doctoral Qualifications • HR-18 Assisted leave for higher degree study • HR-9 Professional experience program
3.	All new continuing academic staff (levels A-C) have formal /accredited teaching qualifications or can demonstrate equivalence.	<ul style="list-style-type: none"> • HR7- Probation for academic staff • Procedures on probation – academic staff
4.	New-to-UniSA academic staff, and staff undertaking new or specialised roles, complete induction and/or training appropriate to their designated roles.	<ul style="list-style-type: none"> • <u>The induction framework of the University of South Australia</u> • <u>Code of Good Practice: Student Behaviour</u>
5.	All academic staff teaching UniSA-approved programs through partners or transnational operations have appropriate academic preparation, induction and language proficiency to deliver the learning program.	<ul style="list-style-type: none"> • Transnational Quality Framework • Professional development framework for transnational teaching and learning
6.	Academic staff engage annually in performance management to identify professional development for advancing skills and knowledge appropriate to their area and level of responsibility.	<ul style="list-style-type: none"> • HR25 – performance management • HR-26 Academic promotion • Financial support for Approved Study: Guidelines for academic staff
7.	The University encourages academic staff to contribute to their discipline and be in touch with current research and scholarship, integrating into their teaching the knowledge and understanding they and others create through scholarly activity, including the creation of text books and other teaching resources.	<ul style="list-style-type: none"> • A-52 Use of teaching and learning resources developed by University staff

Table 3: Curriculum

	UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)
1.	Curriculum design reflects UniSA's strategic direction and expectations as published in the University Teaching and Learning Framework and meets professional accreditation requirements.	<ul style="list-style-type: none"> • Teaching and Learning Framework • Coursework Program Approval Manual
2.	Curriculum design gives due consideration to the diverse backgrounds, aptitudes and abilities of students and all undergraduate programs include Indigenous perspectives.	<ul style="list-style-type: none"> • Coursework approval manual • Indigenous Content in Undergraduate Programs (ICUP) • ICUP Resolution – Academic Board Minutes (August 2005)
3.	There is equivalence in syllabus, learning outcomes and assessment in programs and courses delivered in multiple locations or mode of delivery.	<ul style="list-style-type: none"> • Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11) • Coursework Program Approval Manual
4.	Assessment in all courses: <ul style="list-style-type: none"> • is fair; and • is appropriate to the learning outcomes; • employs a range of assessment methods; • has clearly articulated marking criteria; • is clearly communicated; and • ensures constructive and timely feedback is provided on student achievement and progress 	<ul style="list-style-type: none"> • Assessment policy and procedures manual • Guidelines for examinations
5.	Systematic moderation regimes are employed to improve the validity and reliability of assessment processes.	<ul style="list-style-type: none"> • UniSA Assessment Policy and Procedures
6.	Student, graduate and employer feedback informs comprehensive program reviews. Student feedback is sought on every course each time it is taught.	<ul style="list-style-type: none"> • Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)
7.	Annual monitoring of programs, using a range of data sources, evaluates the continuing development and maintenance of program quality and viability.	<ul style="list-style-type: none"> • Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)
8.	Reaccreditation reviews ensure curricula meet agreed academic and professional requirements.	<ul style="list-style-type: none"> • Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)
9.	Procedures are implemented at the appropriate level (Division, School, program or course coordinator) to systematically analyse stakeholder and student feedback, and to use this information to improve course and program quality.	<ul style="list-style-type: none"> • Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)
10.	Student mobility programs foster internationalisation and build strategic partnerships with overseas institutions and education providers.	<ul style="list-style-type: none"> • Coursework approval manual

Teaching and Learning Academic Outcomes

Tables 1 to 3 above have identified the intent of policies and procedures to generate quality outcomes in teaching and learning. At the highest level of concern, the University is interested in the outcomes it achieves at the three levels of desired excellence in performance; *students, academic staff and curriculum*. The identification of indicators against the central elements of the Teaching and Learning Framework and mapped to the three levels of desired excellence in performance provides the conceptual underpinning for the measurement of performance. Subsequently measures provide the operational translation of the indicators, enabling quantifiable and valid measurement of performance.

Table 4

	Graduate Qualities		Student Engagement		Flexible Learning Environment	
	Indicator	Measure	Indicator	Measure	Indicator	Measure
Students	<p>Graduates obtain professional employment.</p> <p>Employers are satisfied with the UniSA graduates they employ.</p>	<p>Educating Professionals measure from Graduate Destinations Survey (GDS).</p> <p>Employer satisfaction with graduates as measured on Employer Feedback Survey.</p> <p>Generic Skills Scale of the CEQ</p>	Students participate in active learning experiences.	<p>Overall Satisfaction from Australian Graduate Survey (CEQ).</p> <p>Australian Survey of Student Engagement (AUSSE ‘Active Learning Scale’)</p>	<p>Students have access to facilities, amenities, activities and services required to successfully participate in their program of study, irrespective of study location or mode of delivery.</p> <p>Students have access to appropriate facilities, amenities and activities to balance academic development and personal well-being.</p>	<p>Australian Survey of Student Engagement (AUSSE) “Supportive Learning Environment” scale.</p>
Academic Staff	Staff participate in induction and professional development focused upon the development of graduate qualities.	Generic Skill Scale of CEQ.	Staff employ appropriate pedagogy to provide active learning experiences	Good Teaching Scale of CEQ	Staff utilise teaching spaces, facilities, resources and technology that are fit for purpose and support effective teaching and learning.	<p>Australian Staff Student Engagement Survey (SSES) Supportive Learning Environment scale</p>
Curriculum	<p>Programs are designed to equip students to obtain professional employment.</p> <p>The curriculum for a program demonstrates that UniSA’s graduate qualities are embedded and assessed at an appropriate level.</p>	<p>Educating Professionals measure from GDS survey.</p> <p>Generic Skill Scale of CEQ.</p> <p>Analysis and/or annual sampling of program reviews.</p> <p>Employer / professional satisfaction with graduates as measured on employer feedback survey.</p>	Curriculum provides opportunities for active learning experiences.	AUSSE Work Integrated Learning scale	Teaching and learning arrangements are designed to employ a variety of teaching and learning spaces, resources and technologies.	<p>Audit of modes of delivery</p> <p>Utilisation of different class level experiences</p>

Note: Items in red are Corporate Key Performance Indicators

Scorecard of performance

There is a high level of congruency between the indicators and measures that support the Teaching and Learning Academic Standards Framework and those used to assess overall institutional performance through the University's Corporate Planning Process, i.e. the Key Performance Indicators (KPIs). The nature of this congruence facilitates benchmarking, both internally and externally. There is acknowledgement that some measures will act as proxies until a better measure becomes available. Each measure has potentially three defined levels of performance:

- The current level of performance;
- A benchmark level of performance; and
- A target level of performance.

Table 5 takes the Framework's measures and gives the levels of performance as defined above.

Table 5: Scorecard of performance (Report card)

	Graduate Qualities				Student Engagement				Flexible Learning Environment			
	Measure	UniSA result	Benchmark	Target	Measure	UniSA result	Benchmark	Target	Measure	UniSA result	Benchmark	Target
Students	CEQ Generic Skills	72.54	70.32 (ATN) 65% (Nat)	73	CEQ Overall satisfaction	68.88	69.46 (ATN)	72	AUSSE Supportive Learning Env	53	52	58 (USA result)
	GDS Educating Professionals	90	82.86	90	AUSSE Active Learning Scale	40	42	42				
	Employer Satisfaction	work in progress										
Academic staff	CEQ Generic Skills	72.54	70.32 (ATN) 65% (Nat)	73	CEQ Good Teaching	46.27	47.78 (ATN) (52% Nat)	52	SSES Supportive Learning Env	57	52	58 (USA result)
					SSES Active Learning scale	41	42	42				
Curriculum	GDS Educating Professionals	90	82.86 (Nat)	90	AUSSE work integrated learning	48	47	50	Audit of modes of delivery	work in progress		
	CEQ Generic Skills	72.53	70.34	73					Utilisation of different class level experiences	work in progress		
	Sampling of program reviews	qualitative - work in progress										
	Employer satisfaction	work in progress										

Red denotes Corporate KPI and target

Setting, monitoring and maintaining standards

The Framework is a work in progress and will become an important resource to assist improvements in teaching and learning. Our statements of standards will become important reference points in the future development of academic programs, policy and procedures. Academic Policy and Programs Review Committee and Academic Board have a role in the processes for setting, monitoring, and maintaining the Teaching and Learning Academic Standards Framework. Teaching and Learning Committee are integral to realising the opportunities afforded by the measurement of performance and identification of priorities in teaching and learning. It is recommended that APPRC review the Teaching and Learning Academic Standards Framework annually and report to Academic Board.

Recommendation:

That Academic Policy and Program Review Committee recommend to Academic Board the approval of the current version of the UniSA Teaching and Learning Academic Standards Framework and recognise that the standards will be reviewed in 2010.

Appendix 1: Inputs and Process

Inputs and processes

The three major components of the framework for which the University exercises controlling action – ‘Students’, ‘Academic Staff’ and ‘Curriculum’ – can be further developed by examining inputs and processes that govern particular actions. No attempt has been made to split inputs and processes in this framework as such definitions provide no clarity in understanding the overall teaching and learning standards.

On similar reasoning, it was found unnecessary to itemise inputs and process standards across the three dimensions inherent to the Teaching and Learning Framework – Graduate Qualities, Student Engagement, and Flexible Learning Environment, as so many inputs and processes affect the three dimensions simultaneously and a division would either result in arbitrary assignments or many duplicate entries. Nevertheless, at the level of outcomes, it was deemed important to reflect the overall University priorities in Teaching and Learning, hence the approach taken previously. As a result, the inputs and processes necessary to achieve the outcomes have been developed under the three dimensions of ‘Students’ ‘Staff’ and ‘Curriculum’.

1. Students

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
1. The University observes all legislation and national codes relevant to the provision of education to students; it recognizes the student’s legal rights, including Intellectual Property Rights, and upholds privacy principles.	<ul style="list-style-type: none"> University of SA Act (1990) University of SA By-laws University of SA Statutes Code of Good Practice: Student Behaviour (2007) 	<ul style="list-style-type: none"> UniSA students have access to all laws, codes, University Statutes, rules, by-laws, policies and procedures relating to their rights and responsibilities as a student. 	<ul style="list-style-type: none"> Statistics on the number of student grievances and complaints, and their outcomes.
2. Students are provided with consistent policies and efficient procedures for admission, enrolment, progression and completion and have timely access to advisors and all relevant program information.	<ul style="list-style-type: none"> UniSA codes, guidelines and procedures webpage UniSA policy webpage 	<ul style="list-style-type: none"> Accurate and sufficient information is provided on all relevant aspects of a program (including matters such as the curriculum content, learning outcomes, assessment and timetables) before the start of each study period. Marketing of programs is professional and accurate, and maintains the integrity and reputation of the University. 	<ul style="list-style-type: none"> Outcome of University prospective student market research Analysis of data (“hit” rates, focus groups, feedback and surveys) on the New Students website Feedback obtained through Orientation Week <i>TellUs</i> surveys

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
			<ul style="list-style-type: none"> and Division-based feedback surveys. Statistics on the number of academic progress appeals, and their outcomes. Results of MDU survey of UniSA marketing materials. Auditing of Course Information Booklets SEQ
3. All UniSA students have access to clearly articulated policies and transparent processes and outcomes for the administration of grievances and appeals.	<ul style="list-style-type: none"> <u>UniSA Codes, Guidelines and Procedures webpage</u> <u>UniSA Policy webpage</u> C17.0 Resolution of student grievances 	<ul style="list-style-type: none"> UniSA has clearly defined accountabilities in relation to the administration of student appeals and grievances. Evidence of the effective implementation of University appeals and grievances policies is available. 	<ul style="list-style-type: none"> Statistics on the nature and number of grievances, outcomes of grievances and appeals. Statistics on student status (e.g.: conditional, termination, etc), completion rates and time to completion.
4. The University provides opportunities and support to ensure students have representation on University committees to enable participation in decision making.	<ul style="list-style-type: none"> <u>Academic Board Charter</u> <u>University of SA Annual Report.</u> 	<ul style="list-style-type: none"> Students participate in and influence the direction and outcome of University policy. Student representatives receive training and support for participation 	<ul style="list-style-type: none"> Terms of Reference and membership of key committees. Review of the outcomes of organisational decision-making. Number of meetings attended by student representatives – Council, Academic Board
5 Students may enter the University upon demonstration of academic merit with consideration of access and equity and with the	<ul style="list-style-type: none"> <u>Selection and entry to programs (A-18.10)</u> <u>Students with disabilities</u> website 	<ul style="list-style-type: none"> All domestic Year 12 undergraduate students admitted to UniSA satisfy the following conditions: <ul style="list-style-type: none"> TER >55 or equivalent. 	<ul style="list-style-type: none"> Analysis of entrance scores and admissions data derived from IAF, DEEWR and SATAC databases.

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
provision of recognition of prior learning.	<ul style="list-style-type: none"> • <u>Recognition of Prior Learning</u> (A-13.11) • <u>Enrolment policy</u> (A - 48.5) 	<ul style="list-style-type: none"> ○ Satisfy the conditions outlined to achieve SACE or equivalent. ○ relevant prerequisites identified in the University Calendar including minima English and IELTS • Admission policies and processes are informed by progress and completion data for specific cohorts and populations of students, and take into account a student's potential to successfully complete the program requirements. • In setting admission policy, due consideration is given to the University's commitments and responsibilities to equity and access. 	<ul style="list-style-type: none"> • Program outcome indicators itemised by program, course and cohort characteristics: <ul style="list-style-type: none"> ○ Retention, success, completion rates, grade distributions
6. Students are provided with alternative pathways to promote access which take into account the student's ability to successfully complete the requirements of the program.	<ul style="list-style-type: none"> • <u>Selection and entry to programs</u> (A-18.10) • Students with disabilities • <u>Recognition of Prior Learning</u> (A-13.11) • <u>Portfolio entry</u> • <u>USANET</u> Special Access Scheme • <u>UniSA-PAL</u> 	<ul style="list-style-type: none"> • Admission policies and processes for alternative pathways are informed by progress and completion data for specific cohorts and populations of students, and take into account a student's potential to successfully complete the program requirements. 	<ul style="list-style-type: none"> • Analysis of admissions data
7 Students' prior learning is recognised through an academically defensible process which takes into account the student's ability to successfully complete the remaining requirements of the program.	<ul style="list-style-type: none"> • <u>Recognition of Prior Learning</u> (A-13.11) • <u>Guidelines for the implementation of Recognition of Prior Learning</u> • <u>Credit assessor</u> 	<ul style="list-style-type: none"> • Approval mechanisms ensure that students who hold the requisite skills and knowledge are granted RPL. • <u>RPL</u> is consistently and fairly applied. 	<ul style="list-style-type: none"> • Number of admissions with RPL • Number of requests for RPL denied

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
8. Students will have access to core courses and other requirements to enable program completion within the expected timeframe.	<ul style="list-style-type: none"> <u>Domestic Program Approval and Amendment Guidelines</u> Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11) 	<ul style="list-style-type: none"> Students are able to complete their program in the expected time on a full time load or equivalent. 	<ul style="list-style-type: none"> Analysis of student completion data: <ul style="list-style-type: none"> number of students completing the program in expected time; number of enrolments extending past the expected timeframe (excluding leave of absence).
9. Modified teaching and learning arrangements are provided to students based upon special needs including unexpected or exceptional circumstances.	<ul style="list-style-type: none"> <u>Disability Access Plan</u> <u>Assessment policy and procedures manual</u> <u>Discrimination and Harassment Grievance Procedures (Students) (2005)</u> <u>Inclusive Language (C-1.4)</u> <u>Students with disabilities (C-7.3)</u> <u>Anti Racism (C-21.2)</u> <u>Equal Opportunity (C-2.4)</u> <u>Sexual Harassment (C-12.3)</u> 	<ul style="list-style-type: none"> Reasonable adjustments to course content, delivery and assessment are negotiated and included in students' <i>Disability Action Plan</i>. Reasonable adjustments to course content, delivery and assessment are negotiated as required in unexpected circumstances. 	<ul style="list-style-type: none"> Student results (success, completion) by cohorts and study locations. Distribution of grade point averages
10 Students are provided with constructive and timely feedback on their academic achievements and progress.	<ul style="list-style-type: none"> <u>Assessment policy and procedures manual</u> <u>Guidelines for examinations</u> 	<ul style="list-style-type: none"> Course Information Booklets that include information regarding assessment, including criteria are provided in hard copy to students by the first class of the course. 	<ul style="list-style-type: none"> Level of agreement on the CEI core item 7: <i>I have received feedback that is constructive and helpful.</i>

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
11 Students are supported to achieve their learning goals through a variety of activities and experiences which promote social inclusion and engagement. This includes student-led activities promoting community involvement, sporting achievement and leadership development.	<ul style="list-style-type: none"> • Learning connection • New students website • UniSA/UniLife service agreement • Student Ambassadors • Extension type experiences 	<ul style="list-style-type: none"> • An active and positive partnership with UniLife is maintained. • Amenities, facilities, services and student-led organisations supported by UniLife supplement UniSA's provisions and enhance the student learning experience. 	<ul style="list-style-type: none"> • UniLife student survey • Representation of UniLife on key committees. • Participation of students in University decision-making. • Participation or planned participation in activities that enhance the student learning experience (AUSSE – Enriching Educational Experiences scale)
12 Culturally-appropriate learning support is available for Indigenous students.	<ul style="list-style-type: none"> • DUCIER • <u>ICUP Resolution – Academic Board Minutes (August 2005)</u> 	<ul style="list-style-type: none"> • Admission policies and academic processes give effect to the University's commitments and responsibilities to Indigenous students. • Staff will be provided with relevant training in cultural inclusivity/sensitivity. 	<ul style="list-style-type: none"> • Analysis of CEQ, GDS and CEI survey results for indigenous student participation in and satisfaction with programs. • Analysis of Learning Connection visit data
13. International students are supported to adjust to study and life in Australia, to achieve their learning goals and to achieve satisfactory program progress.	<ul style="list-style-type: none"> • <u>Learning and Teaching Unit International student services</u> 	<ul style="list-style-type: none"> • Curriculum and academic services delivered to international students are adapted where appropriate to suit the educational, social, cultural or legal context of international students. • Education curriculum and services offered through collaborators offshore and onshore include agreed essential elements equivalent to those conducted at UniSA's home locations and meet the specified requirements for approval and review. 	<ul style="list-style-type: none"> • International student demographic data (e.g. ethnicity, language). • International student progress and retention rates (reviewed by demographics, equity groups) e.g. <ul style="list-style-type: none"> ○ number of terminations of enrolment. ○ number of withdrawals. ○ success rates ○ completion rates

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
			<ul style="list-style-type: none"> ○ retention rates ○ progression to higher degrees.. • SEQ and TSEQ survey results – international student participation in and satisfaction with, University academic programs and support. • Analysis of AGS, GDS and CEI survey results for international students.
14. There is parity between the international experience and the onshore program experience ensured through contracts for collaborative programs.	<ul style="list-style-type: none"> • <u>Transnational Contacts and Agreements</u> (logon required) • <u>Transnational Quality Framework Manual</u> (logon required) • <u>Transnational Quality Records</u> (logon required) • <u>International Institutional Agreement</u> (logon required) 	<ul style="list-style-type: none"> • Annual program review and contract review occurs and is reported to the Transnational Management Group and Academic Board with Action Plan to identify gaps and actions. 	<ul style="list-style-type: none"> • Analysis of partner (offshore and onshore) contract review reports and action plans • TSEQ partner support statements. Comparisons of UniSA support statements SEQ vs TSEQ.
15 Professional and personal development activities designed to increase career management skills and opportunities, and enhance transition from study to work, are offered to students.	<ul style="list-style-type: none"> • <u>Careers Services website</u> • <u>My Career Plan</u> (special logon required) 	<ul style="list-style-type: none"> • <u>Careers Services</u> identifies activities and reports on their success. • Benchmarking the effectiveness of professional and personal development activities and services is undertaken. 	<ul style="list-style-type: none"> • AGS usage of careers services linked to employment outcomes. • No of visits to career services linked to employment outcomes. • Graduates in full-time

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
			employment (AGS) Graduate Qualities scale (AGS) <ul style="list-style-type: none"> Employer surveys Graduate (OSI) and student (CEI) satisfaction)
16 UniSA graduands meet the prescribed requirements for the coursework award.	<ul style="list-style-type: none"> <u>Enrolment policy (A - 48.5)</u> <u>Graduation and Records (A-51.1)</u> <u>Domestic Program Approval and Amendment Guidelines</u> <u>Australian Qualifications Framework</u> 	<ul style="list-style-type: none"> Program approval is consistent with AQF <u>Maximum credit allowed</u> to receive an award from UniSA: <ul style="list-style-type: none"> <i>Associate Degrees and two-year Diplomas</i>: Normally a maximum of two-thirds of the total units of the program; <i>Undergraduate degree program</i>: a student must normally complete at least the equivalent of one year of full time study at UniSA <i>Honours Degrees</i>: Maximum of one third of the total units of the program <i>Graduate Certificate, Graduate Diplomas, Coursework Masters and Professional Doctorates</i>: Normally a maximum of one-third of the total units of the program 	<ul style="list-style-type: none"> Analysis of Medici credit data by award level

ACADEMIC STAFF

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
1 The University recruits and selects academic staff the organisation needs to achieve its strategic directions and who demonstrate attributes that are consistent with the organisation's directions and culture.	<ul style="list-style-type: none"> HR-27 staff recruitment and selection 	<ul style="list-style-type: none"> Strategies are in place to enhance the teaching quality of full-time and sessional staff. 	<ul style="list-style-type: none"> Profile of staff professional qualifications by role, appointment status and organizational course e.g. <ul style="list-style-type: none"> % of staff with a PhD; Profile of new staff teaching qualifications and/or experience i.e. <ul style="list-style-type: none"> % of staff with teaching qualification; or Five years + industry/teaching experience. Staff professional activities e.g. teaching projects, fellowships, publications.
2 All academic staff are academically competent in their discipline areas.	<ul style="list-style-type: none"> Procedures for the Appointment of Academic Staff Level B and above without Doctoral qualifications Guidelines for Academic Staff for Commencement and Completion of Doctoral Qualifications HR-18 Assisted leave for higher degree study HR-9 Professional experience program 	<ul style="list-style-type: none"> Policies for performance appraisal of teaching staff are implemented. 	<ul style="list-style-type: none"> Analysis of results in performance management section of Staff Survey
3 All new academic staff (levels A-C) have formal / accredited teaching qualifications or can demonstrate equivalence.	<ul style="list-style-type: none"> HR7- Probation for academic staff Procedures on probation – academic staff 	<ul style="list-style-type: none"> All new Level A-C academic staff complete the Graduate Certificate in Education (University Teaching) as part of probation 	

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
		(unless exempted under the relevant policy).	
4 New-to-UniSA academic staff, and staff undertaking new or specialised roles, complete induction and/or training appropriate to their designated roles.	<ul style="list-style-type: none"> The induction framework of the University of South Australia 	<ul style="list-style-type: none"> All HoS's, Program Directors and Course Coordinators complete induction within one year of appointment or within one year of identified training need. 	<ul style="list-style-type: none"> Number of staff compliant with induction program attendance
5 All academic staff teaching UniSA-approved programs through partners or transnational operations have appropriate academic preparation, induction and language proficiency to deliver the learning program.	<ul style="list-style-type: none"> Transnational Quality Framework Professional development framework for transnational teaching and learning 	<ul style="list-style-type: none"> Schools monitor and report on the qualifications, experience, academic preparation, induction and language proficiency of staff teaching in partner/transnational operations. 	<ul style="list-style-type: none"> Analysis of TSEQ data.
6 Academic staff engage annually in performance management to identify professional development for advancing skills and knowledge appropriate to their area and level of responsibility.	<ul style="list-style-type: none"> HR25 – performance management HR-26 Academic promotion Financial support for Approved Study: Guidelines for academic staff 	<ul style="list-style-type: none"> HR review, monitor and report on their staff profile; qualifications of staff; provision of professional development; and implementation of workforce development programs. 	<ul style="list-style-type: none"> No. of staff participating in professional development activities/ conferences by type. Staff recognition, awards and rewards.
7 The University encourages academic staff to contribute to their discipline and be in touch with current research and scholarship, integrating into their teaching the knowledge and understanding they and others create through scholarly activity, including the creation of text books and other teaching resources.	<ul style="list-style-type: none"> A-52 Use of teaching and learning resources developed by University staff 	<p>Teaching staff:</p> <ul style="list-style-type: none"> can demonstrate reflective practice in their teaching; participate in formal activities associated with inquiry into effective teaching; keep abreast of developments in their discipline and/or profession and in higher education teaching and learning; provide rich learning tasks that include such elements as: 	<ul style="list-style-type: none"> 100% of courses administer CEI/SET student feedback whenever the course is offered and >80% of students who respond to the survey in a particular course agree that “overall I am satisfied with this course”. Portfolios/ evidentiary samples of good teaching practice Participation in Teaching@UniSA Participation in UniSA

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
		<p>opportunities for student-centred learning, collaborative learning, relevant contexts, use of technology as an instructional aid and flexibilities that cater for individual needs and differences; and</p> <ul style="list-style-type: none"> draw on students' life & work experiences in their teaching & wherever possible make the subject relevant to the students' career goals. 	<p>symposiums and other academic development activities</p> <ul style="list-style-type: none"> Number of academic staff recognized nationally through ALTC Teaching Awards.

CURRICULUM

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
1 Curriculum design reflects UniSA's strategic direction and expectations as published in the University Teaching and Learning Framework and meets professional accreditation requirements.	<ul style="list-style-type: none"> Teaching and Learning Framework Coursework Program Approval Manual 	<ul style="list-style-type: none"> All programs conform to UniSA's quality and viability criteria. 	<ul style="list-style-type: none"> National rankings and comparisons using <ul style="list-style-type: none"> AGS; <i>acknowledging these are lag and lead indicators are preferred.</i>
2 Curriculum design gives due consideration to the diverse backgrounds, aptitudes and abilities of students and all undergraduate programs include Indigenous perspectives.	<ul style="list-style-type: none"> Coursework approval manual Indigenous Content in Undergraduate Programs (ICUP) ICUP Resolution – Academic Board Minutes (August 2005) 	<p>The Teaching and Learning Framework gives effect to the University's commitments and responsibilities and responsibilities to equity and access.</p> <p>Staff are able to access relevant training in developing cultural inclusivity/sensitivity, equity and diversity</p>	<ul style="list-style-type: none"> Analysis of CEQ and CEI survey results of Equity student satisfaction.
3 There is equivalence in syllabus, learning outcomes and assessment in programs and courses delivered in multiple locations or mode of delivery.	<ul style="list-style-type: none"> Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11) Coursework Program Approval Manual 	<ul style="list-style-type: none"> Moderation procedures are implemented to ensure the equivalence of syllabus, learning outcomes and assessment across different locations and modes of study. 	<ul style="list-style-type: none"> Comparison/analysis of student success and grade point averages by location.
4 Assessment in all courses: <ul style="list-style-type: none"> is fair; and is appropriate to the learning outcomes; employs a range of assessment methods; has clearly articulated marking 	<ul style="list-style-type: none"> Assessment policy and procedures manual Guidelines for examinations 	<ul style="list-style-type: none"> Assessment complies with UniSA policies and procedures 	<ul style="list-style-type: none"> Distribution of grade point averages

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
<ul style="list-style-type: none"> criteria; is clearly communicated; and ensures constructive and timely feedback is provided on student achievement and progress 			
5 Systematic moderation regimes are employed to improve the validity and reliability of assessment processes.	<ul style="list-style-type: none"> <u>UniSA Assessment Policy and Procedures</u> 	<ul style="list-style-type: none"> Judgements made by different assessors against agreed standards are reliable and consistent. External moderators validate assessments against professional/industry standards. 	<ul style="list-style-type: none"> Number of moderated items
6 Student, graduate and employer feedback informs comprehensive program reviews. Student feedback is sought on every course each time it is taught.	<ul style="list-style-type: none"> <u>Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)</u> 	<ul style="list-style-type: none"> The CEI /SET survey instruments are available for undergraduate and postgraduate coursework. Employers' survey is administered to gather employers' perceptions on the effectiveness of UniSA's programs and the employability of its graduates. All ongoing programs participate in and complete comprehensive program review. 	<ul style="list-style-type: none"> Responses to the SET course survey Outcomes of annual and reaccreditation program reviews.
7 Annual monitoring of programs, using a range of data sources, evaluates the continuing development and maintenance of program quality and viability.	<ul style="list-style-type: none"> <u>Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)</u> 	<ul style="list-style-type: none"> All ongoing programs participate in and complete comprehensive program review. 	<ul style="list-style-type: none"> Number of programs identified for early reaccreditation review.
8 Reaccreditation reviews ensure curricula meet agreed academic and professional requirements.	<ul style="list-style-type: none"> <u>Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)</u> 	<ul style="list-style-type: none"> All ongoing programs participate in and complete comprehensive program review. 	<ul style="list-style-type: none"> Number of programs completing reaccreditation review. Number of programs externally accredited. Implementation of professional accreditation requirements.

UniSA standard	Key policies, procedures, guidelines and processes (internal and external reference points)	Indicator (performance outcomes)	Data Measures monitor compliance with the standard
9 Procedures are implemented at the appropriate level (Division, School, program or course coordinator) to systematically analyse stakeholder and student feedback, and to use this information to improve course and program quality.	<ul style="list-style-type: none"> <u>Quality assurance and improvement: Programs, courses and teaching arrangements (A-35A.11)</u> 	<ul style="list-style-type: none"> Engagement of industry and/or professions is evident in the development and monitoring of UniSA programs. 	<ul style="list-style-type: none"> Analysis and/or annual sampling of program reviews and outcomes achieved indicating acceptable compliance with the Standards. Employer/professional satisfaction with graduates using GDS and other employment destination measures.
10 Student mobility programs foster internationalisation and build strategic partnerships with overseas institutions and education providers.	<ul style="list-style-type: none"> <u>Coursework approval manual</u> 	<ul style="list-style-type: none"> Curriculum provides recognition of student mobility activities 	<ul style="list-style-type: none"> Reports on student mobility and analyses by program, school and faculty.



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