



IMHE GENERAL CONFERENCE
Attaining and Sustaining Mass Higher Education
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**How can higher education maintain
and improve quality?**

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I am the head of the newly established higher education regulator in Australia, called the Tertiary Education Quality and Standards Agency (TEQSA). TEQSA has responsibility for all 173 higher education institutions in Australia – covering both universities and private providers of higher education. Our broad set of objects includes responsibility for regulation, quality assurance and improvement in all higher education institutions, including consumer protection for international students.

It is in the context of our establishment just over a year ago, that I offer my comments today.

I will focus on only three issues of what could be many responses to the question of how higher education can maintain and improve quality. It is my belief that:

1. No country will maintain or improve quality in higher education simply by maintaining the status quo. We need to consider how to challenge and disrupt orthodoxies and complacency in the higher education sector in relation to quality. For Australia the time for such a challenge is now.
2. No provider, whether a university or a private provider, will maintain or improve quality until every staff member, in particular individual academics, understands that they have a level of responsibility, a real accountability for the quality of the student experience and for student outcomes. It is not enough that there is an understanding of this accountability by the Vice-Chancellor, the Rector or the University Quality Manager.
3. And finally no quality assurance body or regulator will maintain or improve quality by relying only on compliance with, or assessment of, quality processes. As a sector we must tackle the task of measuring outcomes, even those which prove elusive, problematic and seemingly impossible to achieve consensus on.

Now let me provide some context for these assertions.



Australia shares with all nations represented here today, a commitment to delivering the highest quality higher education for all students enrolled in its providers; which in Australia includes a relatively large proportion of international students.

In 2008, a major review of Australian higher education led by Professor Denise Bradley, proposed a significant redesign of Australia's higher education regulatory environment. This included a move from a fragmented approach of nine separate government regulators to a single independent national regulator. The Government of the day supported this recommendation. TEQSA was established in July 2011 and opened for regulatory activity in February this year.

TEQSA is a challenge to the status quo of higher education quality assurance in Australia. The well-regarded quality assurance body, the Australian Universities Quality Agency (AUQA) closed in 2011 and was replaced by TEQSA. This was not because of any failure by AUQA to do its job well. Its fitness for purpose approach to quality was right for the time at which it was established - the year 2000. But after 10 years of operation, it was time for Australia's approach to higher education quality to evolve, for a variety of reasons, and it was time for higher education institutions to be challenged by a new approach that more appropriately supports national policy directions.

The establishment of a standards and risk-based regulator in Australia with the dual responsibilities of regulation and quality assurance has been, and continues to be, a disruptive event in the Australian higher education landscape.

A disruptive event is an act which interrupts continuity in some way and I think it can be a healthy part of public policy. The result of a disruption to continuity may be reflection, re-engineering or reinvigoration of all of those involved. An organisation which is resilient, dynamic and responsive will thrive with the challenge of such an event, identifying and implementing new areas for improvement and innovation.

A disruptive event for its own sake is not good public policy, but where it can challenge orthodoxies, complacency and comfort levels as well as serve other developments and improvements to policy and practice, then I see great value in it. A disruption in the policy landscape can and should be the result of innovative thinking about public policy and a commitment by governments to continuous improvement in public policy.

In addition to being a sensible rationalisation of regulatory oversight, TEQSA's establishment was part of the government's response to the introduction of a deregulated market for government funding for higher education places. There was a concern that as student numbers increased, particularly in our universities, which would be the major beneficiaries of deregulation, that there was a risk that academic standards might be compromised. TEQSA was established to guard against such an eventuality.

But TEQSA's establishment has also been a significant disruptive event in the higher education landscape, particularly for universities, as it has challenged the orthodoxies of over 10 years of approaching quality assurance in a particular way.



For the first time there is accountability to an external body by a university for its privilege to exercise self-accrediting authority – that is, for accrediting, monitoring and evaluating its own courses. Rather than taking away from universities some preordained rights through this process, I believe that this will inevitably result in a resurgence of the importance of strong academic governance in monitoring academic standards. This should lead to a more focused sense of responsibility by the academic community on outcomes for students.

TEQSA is challenging the orthodoxies and to some extent the complacency of the university sector. It is doing this by moving away from the AUQA style standard cycle of fitness for purpose audits, undertaken by panels comprised of peers, using a standard audit approach, based on evidence that was time-specific, providing a snapshot on quality at that particular point in time. This model is not the operating framework for TEQSA.

The decision maker within our Agency is the Commission, made up of five Commissioners, of whom I am the Chief Commissioner. We make regulatory decisions about Australia's higher education institutions using a set of Threshold Standards that lay out a single broad legislative framework that needs to be met by all providers. Our responses are scaled in accordance with three regulatory principles – proportionality, risk and regulatory necessity. Our regulatory decisions, whether they are in relation to the registration of institutions, accreditation of courses, or unscheduled compliance assessments against the Threshold Standards, are based on multiple sources of evidence and data.

We may approve a provider, including universities, with registration for up to seven years, but it may be for a shorter period and we may impose conditions on its registration. We utilise a graduated approach to compliance with the Threshold Standards. Most of our activity is at the level of direct engagement with providers to guide them to voluntarily comply with the Standards. We can however, also take legal action against a provider, with significant enforcement outcomes including administrative sanctions, and civil and criminal penalties, should the case demand it.

We do not use a peer review methodology but we do invite individual experts to provide analysis and advice on particular topics directly relevant to their demonstrated expertise.

We have developed a regulatory risk framework which we use on an ongoing basis to undertake risk assessments of each provider. This framework is informed by an annual data collection to gauge whether providers are at risk of not meeting the Threshold Standards. It has been designed to ensure that our resources are directed to higher areas of risk, based on validated, high quality data and intelligence about a provider.

I have no doubt that the change to a risk-based regulator that assesses all providers against a common set of standards, is both a worthy policy direction and also a wake-up call for all higher education institutions to reflect and act on the quality of educational experience and outcomes for students.

I now move to my second proposition.



Many academics believe it should be enough to say to the world as they have done over many generations – trust us, we’re academics, we’re experts in what we do, you can trust us to get on with our job and deliver. So please leave us alone.

I’m afraid the world has changed. Higher education institutions will not be left alone. This is not a targeted vendetta against universities, higher education providers or academics, but part of a broader move towards greater accountability in a range of what are perceived as ‘public spheres of life’. And in the notion of a public sphere, I include all higher education provision, whether it is by a public or private higher education institution. To understand these changes is to understand current higher education policy both in Australia and internationally. It is the context in which TEQSA has been created.

Most developed nations are experiencing a wave of activity and interest in greater public sector accountability. This demand is provoked by a number of parallel developments:

1. There is a quest for greater value for money from government investment in higher education from all governments. At the same time higher education sectors around the world are calling for more funding. Yet serious budget restraints and a range of competing priorities mean such requests are going to be difficult to meet.
2. There is a growing interest in international education, and not just by those nations and institutions that have dominated the market for the past decade. Nations and higher education institutions are seeking to assert the superiority of their own systems and market their own educational offerings on the basis of quality. But everyone seeks and needs a currency to make such comparisons of quality.
3. An increasing number of developed countries are moving to higher education student fees and in doing so, positioning their students as consumers with a choice, with a voice, with expectations.
4. And with the greater emphasis on student choice – there is always pressure to give students an opportunity to make an informed choice. But what information do students need? Surely not just descriptions of courses but data about performance, about outcomes, as well.
5. And finally there is an unrelenting interest in league tables – by governments and some would argue, by students and parents.

These pressures are compounded by the recognition of the importance of a nation’s capacity to deliver a highly skilled workforce, which is at the very heart of productivity debates throughout the world.



The pressure is on higher education to deliver, in so many ways. It is framing expectations of an accountability that is perhaps unprecedented in the modern era of higher education.

Previously there was an unspoken acceptance that universities were the best placed to judge the quality of higher education. This was accompanied by an acceptance that higher education should not be regulated nor quality assessed by anyone but academics themselves. The concept of peer review was reified in this paradigm.

Such an approach is not sufficient in the current context. In Australia, I believe there are four primary domains of regulation and thus accountability – through national regulation by TEQSA & other government bodies; through professional accreditation; through the operation of a market with student demand and particular funding incentives; and most importantly through self-regulation by the institution and all of its parts.

For higher education institutions to maintain quality and indeed to improve, there must be an acceptance of these broader demands for accountability and a willingness to engage in the debates around them.

The establishment of TEQSA is part of this broader move towards greater accountability, in a sector which is undergoing rapid change.

Finally, a few brief words about the importance of an outcomes-based approach to standards and quality in higher education. Without knowledge of the outcomes of the educational experience, in particular in learning and teaching, there is no real basis for identifying areas for improvement in higher education. Public knowledge of outcomes is not about shaming an institution but having them recognise that they are not achieving standards or goals that they might otherwise assert.

TEQSA's regulatory framework is defined by a set of Threshold Standards which are currently a combination of inputs, processes and outcomes. The TEQSA Commission would like to see providers increasingly demonstrating their capacity to meet the Threshold Standards through evidence relating to outcomes – and not only in relation to teaching and learning – but also in relation to research, to academic governance and other areas of the educational enterprise.

We all know that an outcomes approach is not without its problems. Firstly, is the problem that there is not necessarily consensus on the end destination of a higher education – that is, the outcomes may be contested. I think it is fair to say that academics have generally operated by assumed, implicitly understood outcomes, but not necessarily articulated these in any public way.

The challenges of both the Tuning process in Europe, the US and a similar process that was run in Australia in 2011, called the Learning and Teaching Academic Standards project, have been real, as these initiatives have sought to reach a settlement, a shared understanding, nationally or across Europe, as to the desired learning outcomes for graduates in particular fields of study. That is, they have sought to identify explicit statements of learning outcomes from higher education.



This is not an easy settlement to achieve but these projects have shown that academics are willing and eager to do the hard work to identify such learning outcomes.

The second problem is a cluster of issues relating to the intrinsic validity of an outcomes approach in education. These issues arise in part because of the nature of education. It is an acknowledgement that higher education institutions are responsible for producing graduate outcomes in environments and under conditions which are qualitatively different from the places that are responsible for the efficient and effective manufacture of a car or television set or indeed delivery of other services. Higher education institutions are not and should not become factories.

So, whilst projects such as AHELO are endeavouring to forge new approaches in the outcomes space, a number of questions remain.

Do we have enough information about the outcomes of learning to be able to fairly and validly monitor performance? Is it fair or indeed valid to aggregate outcomes across courses of study or institutions, which are essentially individualised in their achievement? Is there enough causality between the outcomes of higher education and the service delivery by the higher education institution or do other factors, such as a student's environment, confound the achievement of outcomes to such an extent that they can't validly be identified or used? And if you can't directly measure the outcomes of higher education in a way that everyone can agree upon, are there acceptable proxies that can be accepted? And what is the best time to measure an outcome from higher education – is it the immediate outcome (near or at the time of graduation), or medium term (five years after graduation) or long term. And finally how do we measure outcomes in a meaningful way for individuals, academic managers, institutional leaders and policy makers?

The outcomes debate will be running for some time to come, including throughout this conference, but I believe that it is a conversation that needs to continue both nationally and internationally. No-one can afford to put their head in the sand about accountabilities for higher education outcomes.

In conclusion, Australia has made some difficult decisions to focus on the continuous quality improvement of its higher education public policy landscape. The establishment of TEQSA is one part of that and we look forward to future opportunities to share with all of you in the achievements and pitfalls of our journey.

