



Higher Education Standards Panel

Communique Number 2 – August 2012

Introduction

Welcome to the second Communique from the Higher Education Standards Panel (Panel). The Panel's first Communique (June 2012) was primarily introductory. This Communique outlines some issues identified by the Panel and the sector, the work the Panel proposes to undertake in the coming period, some of the approaches that the Panel has been considering, and the Panel's initial priorities.

Since the first Communique was distributed the Panel has met with more stakeholders, which has been invaluable in helping the Panel understand ideas about the current standards that are emerging as the sector engages with the new regulatory environment. This consultative process will continue as a central feature of the Panel's work including both formal and informal consultations.

The Current 'Standards Landscape'

The current and proposed standards for higher education provision constitute the new Higher Education Standards Framework (HES Framework), which was established under the *TEQSA Act 2011*. The only existing standards in the HES Framework are the Threshold Standards. They are legislative instruments and are the basis for regulation by TEQSA. The remaining proposed 'non-threshold' standards in the HES Framework (Teaching and Learning, Research and Information standards) are yet to be defined. Regulation against the 'non-threshold' standards is not being contemplated currently. The Panel is required to commence a review of the Threshold Standards by January 2013.

Emerging Issues

The Panel has identified a number of emerging issues that will need to be considered in its work, helped by its early consultations with the sector and with the Regulator. The Panel's *initial* perspectives on some of these issues are highlighted below. These reflect the Panel's own views in looking to the work ahead as well as perspectives put to the Panel in its initial consultations with stakeholders.

'Threshold' standards - The current legislation provides for regulation against the Threshold Standards. While the concept of 'threshold' standards can be interpreted in a number of ways, as a point of departure for its work the Panel proposes to interpret the concept of 'threshold' standards as the minimum level of performance that needs to be achieved for higher education provision in Australia. While the Panel acknowledges that higher levels of performance may exist across providers (and are indeed widespread), the Panel sees advantages in conceiving of 'threshold' standards as codifying the 'minimum' acceptable level of performance for providing higher education in Australia.

The Panel sees such 'threshold' standards as unlikely to lead to 'grades' of compliance; 'threshold' standards would either be met or not met. It is important to note that the use of the term 'minimum' is not taken by the Panel to imply 'low'. This view has been supported by the stakeholders consulted so far, but the Panel's views will continue to be guided by further consultation with the sector and other stakeholders as the review of the Threshold Standards proceeds.

The nature of 'non-threshold' standards - The 'non-threshold' standards contemplated by the HES Framework remain undefined in scope and nature. While their names are in some cases familiar to the sector (teaching, learning, research), what they might actually encompass is as yet undefined and open to interpretation. Less attention has been given to the concept of 'information standards'.

The role of 'non-threshold' standards - It is important to note that regulation against the 'non-threshold' standards is not being contemplated, thus raising questions about what roles such standards might serve and what importance should be attached to their development.

The scope of the current Threshold Standards - The current Threshold Standards already encompass elements of higher education provision that would commonly be recognised as 'teaching', 'learning', 'research' and 'information' (i.e. the topics proposed for 'non-threshold' standards), although these topics are not always named explicitly in the existing Threshold Standards. Whether the extent to which these elements are represented in the Threshold Standards is consistent with the minimum level of performance that should be expected of higher education provision in Australia is open to further exploration, and the Panel intends to do so (noting that the inclusion of 'research' may vary according to the scope and intensity of research undertaken by the various types of providers).

Review of the current Threshold Standards - The Panel is required to undertake a review of the existing Threshold Standards and the Panel has already turned its mind to this review. The Panel regards the Threshold Standards as the centrepiece of the new regulatory environment and the foundation for standards-based regulation. In view of the pivotal and central role of the Threshold Standards in defining the minimum standard for provision of higher education in Australia, the Panel sees this review as its highest priority.

Issues with the current Threshold Standards and the HES Framework - The Panel's work so far, which has been informed by its early consultations with the sector and the Regulator, has identified the following matters as topics of particular interest or concern about the existing Threshold Standards and the HES Framework:

- the overall architecture of the HES Framework, incorporating 'threshold' and 'non-threshold' standards and the potential relationship between these components
- the robustness of the underlying conceptual basis of the current standards
- the extent to which teaching, learning, research and information 'standards' should be represented in 'threshold' standards
- the relative emphasis given to input, process, output and outcome characteristics
- the extent to which the standards themselves might guide their interpretation and point to the types of evidence that could indicate compliance
- how and to what extent standards might point to external reference points
- the relationship between threshold standards and other 'standards' that are outside of the HES Framework e.g. as developed by disciplines and professional accreditation agencies
- whether the existing standards encompass the characteristics of *all* types of providers of higher education to the extent they should
- that standards do not stifle innovation and diversity of offerings to students in Australia
- various concerns about the form, style, complexity and internal consistency of the existing Threshold Standards.

Other issues may emerge as consultations with stakeholders continue.

Progressing the Review of the Threshold Standards

As indicated above, the Panel sees the review of the Threshold Standards as a high priority. It proposes to advance this work through an iterative consultative process with the sector and other stakeholders aimed at:

- further distillation of critical issues (e.g. consultations leading to discussion papers)
- development of proposed approaches (e.g. options papers)
- preferred solutions and consensus.

The Panel will be preparing papers on particular themes and issues for consultation with stakeholders. At this point, the Panel believes these might initially encompass the underlying conceptual basis for threshold standards, the extent of the representation of the proposed 'non-threshold' topics (i.e. teaching, learning, research and information) in the current standards, what might be encompassed by research standards more generally, and the emphasis given to learning outcomes. Further detail will be provided on the Panel's thinking about these topics in due course.

In contemplating revisions to the existing standards, the Panel is conscious of not stifling a diversity of offerings in higher education in Australia, provided high quality outcomes are still achieved.

In planning for the review, the Panel has noted the investment in the initial standards and regulatory approaches that has already been made by the sector and the Regulator, the importance of careful consultation with the gamut of stakeholders about potential changes to the standards, and the time required to do so. The Panel envisages that consultations will continue through the remainder of 2012 and well into 2013. The earliest that the Panel expects to be in a position to provide considered advice to the Commonwealth Minister for Tertiary Education, Skills, Science and Research on proposed revisions to the Threshold Standards and related matters would be late in 2013.

Technical Amendments to the Current Threshold Standards

A number of technical errors in the current standards have been drawn to the attention of the Panel. In the Panel's view some of these can be corrected without having a major impact on the remainder of the standards or entering into areas that are best covered by the forthcoming detailed review.

The Panel has already provided advice to the Commonwealth Minister for Tertiary Education, Skills, Science and Research on these points. The Panel's advice on these technical amendments is a response to the sector's immediate concerns. It is quite separate from the comprehensive review of the Threshold Standards that the Panel is commencing.

Providing Feedback to the Panel

If you wish to provide feedback on any matter raised in this Communique, the Panel can be contacted via the Higher Education Standards Executive at: standards@teqsa.gov.au

Formal feedback on future discussion papers and the like will be invited at the time. Feedback on the content and form of the current Threshold Standards can be provided to the Panel at any time.

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Chair
Higher Education Standards Panel

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