



Higher Education Standards Panel

Communique Number 4 – November 2012

Introduction

Welcome to the fourth Communique from the Higher Education Standards Panel (Panel). This Communique focusses on the ‘organising framework’ that the Panel intends to use in reviewing and recommending revisions to the current Threshold Standards. It is hoped that an explanation of this aspect of the Panel’s approach will enhance understanding of the revisions that are recommended to the sector.

Background

In commencing its review of the Threshold Standards, and through the various consultations with providers that have occurred so far, the Panel has identified a number of factors that it believes detract from the clarity and utility of the current Threshold Standards and the Higher Education Standards Framework (the HES Framework) of which they are part, including:

- The HES Framework consists of a mix of regulated ‘Threshold’ Standards and mooted, but unspecified and unregulated, ‘Non-Threshold’ Standards (Teaching and Learning, Research, Information).
- Aspects of teaching, learning, research and information are already covered in the current Threshold Standards, although not necessarily explicitly or sufficiently.
- There is overlap across the different sections of the Threshold Standards which, *inter alia*, has led to reports of multiple cross-referencing and repetition of responses in preparation of applications to TEQSA for re-registration.
- The Threshold Standards have inconsistent formats such as the use of headings and sub-headings that are standards statements in some standards (e.g. Provider Course Accreditation Standards) and only taxonomic headings in others (e.g. Provider Registrations Standards).
- The existing Standards give limited intrinsic indication about how they might be interpreted or the types of evidence that might be used to indicate compliance.

In the Panel’s view these difficulties reflect, at least in part, the origins of the current Threshold Standards in the former National Protocols (which were neither ‘standards’ as currently envisaged, nor an organising framework for standards statements), an overlay of partitioning of the current Threshold Standards for anticipated regulatory purposes (Provider Registration, Provider Categories and Provider Course Accreditation) and referencing the Australian Qualifications Framework (AQF) through the Qualification Standards.

Challenges

Irrespective of any revisions of the content and scope that might be considered in reviewing the current Threshold Standards and the Higher Education Standards Framework, the Panel’s view is that the underlying organising framework can and should be improved to obviate some of the existing difficulties that are highlighted above.

A more coherent framework is seen to be of benefit to all users of the standards.

Proposed organising framework for HE Standards

In thinking afresh about a possible organising framework for future standards, the Panel has come to the view that the structure of the standards can be grounded in a mapping of the characteristics that are common to providers of higher education in Australia. Because the standards are about providers and the provision of higher education, it seems fundamentally sound to organise the standards around the features of providers and what they normally do. This is not to suggest that there is, or should be, only one model of a higher education provider. As stated in previous Communiqués, the Panel is not seeking to inhibit a diversity of offerings of higher education or to promote standardisation. Any organising framework adopted by the Panel needs to cater for a variety of models of provider and modes of delivery, both existing and emerging, where these deliver quality educational outcomes. This point will be considered again later in the Communiqué.

As a point of departure, the Panel has developed a schematic representation of the characteristics of a higher education provider as a high-level organising framework to underpin the development of standards, along the lines shown in Fig 1.

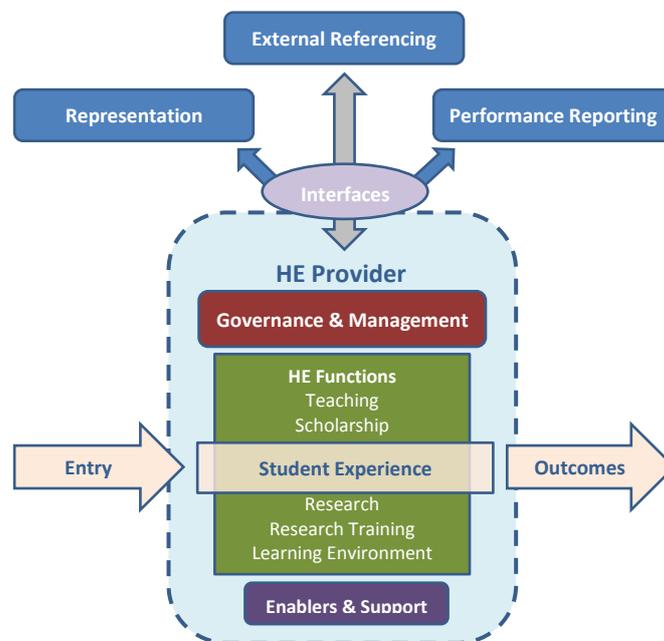


Fig. 1 Schematic Overview of Higher Education Provision

Readers who are familiar with the various international quality frameworks of the 'business excellence' type (such as the Baldrige framework¹ in the USA, the EFQM Excellence Model² in Europe and the Australian Business Excellence Framework³) will know the utility of this approach. All of these models utilise a coherent high-level schematic representation of the organisation, which serves as a tool to map the features of the organisation systemically, while nonetheless being adaptable to a diversity of different organisations because of its schematic nature.

¹ <http://www.nist.gov/baldrige/>

² <http://www.efqm.org/en/tabid/132/default.aspx>

³ http://www.saiglobal.com/business-improvement/solutions/australianbusinessexcellenceframework.htm?utm_source=SydneySafetySolutions&utm_medium=ExternalEvent&utm_campaign=TISOct2012

While the approach advocated by these frameworks offers a helpful perspective, the Panel notes that none of them was designed for the development of standards for higher education and the Panel believes it useful to develop an approach that is specifically tailored for its specialised work.

Mapping a provider's characteristics

The Panel has begun its work in mapping the characteristics of higher education providers based on the schematic model described above (Fig 1). The resultant initial working taxonomy is listed below, along with some indicative examples of the types of characteristics that could be included under each heading.

- **Entity** (e.g. the provider's incorporation, business model, partnership arrangements)
- **Representation** (e.g. agents, marketing and information for prospective students)
- **Corporate Governance** (e.g. direction setting, risk oversight, performance monitoring)
- **Academic Governance** (e.g. academic leadership, HE policies, approval and quality assurance)
- **Management** (e.g. staffing, finance, risk management, information systems, analytics)
- **HE Functions** (e.g. course design, teaching, scholarship, research, research training, learning environment)
- **Student Experience** (e.g. access, entry, progression, completion, learning outcomes, qualification)
- **Enablers** (e.g. detection of students at risk, academic support, personal support, safety nets)
- **Performance** (e.g. HE outputs and outcomes, indicators, external comparators, reporting)

The Panel notes that the complexity of a higher educational provider can be broken down in various ways. However, the Panel has found this to be a pragmatic and tangible set of headings as a starting point for considering the characteristics of a provider as a prelude to standards development. The list given here is meant to be illustrative. Members of the sector will recognise that the detail that might be represented under the various headings could vary considerably.

Moving from a map of characteristics to standard statements

The approach outlined above is intended to give the Panel a practical way to catalogue the characteristics that would commonly be present in a higher education provider in Australia, albeit in various forms and to various extent across different types of providers. This approach is seen to be both comprehensive and coherent; thus potentially addressing identified shortcomings in the architecture of the current standards.

It is important to note that in taking this approach to standards review and development, the Panel is NOT suggesting that comprehensive identification of the characteristics of higher education providers means that all such characteristics would warrant a corresponding standard statement(s). It does ensure, however, that important characteristics are unlikely to be overlooked. Whether standards are indeed proposed or developed for particular characteristics will be subject to a series of decision criteria encompassing e.g. risk to quality, materiality and others, which will be outlined in a subsequent Communique.

Some benefits of this approach

The Panel sees this approach as beneficial in several respects including:

- Grounding the organising framework for higher education standards in the practical realities of higher education provision with which the sector is familiar.

- Offering a systemic and comprehensive approach to considering the characteristics of providers as a basis for considering whether such characteristics may warrant an associated standard statement(s).
- Encouraging systemic clarification of higher education provision in terms of inputs, activities, processes, outputs and outcomes.
- Providing a practical method for comparisons and gap analyses between existing and proposed standards.
- Freeing the revision of standards from the structural legacies of the former protocols (but not disregarding their intent where this continues to be relevant), and from the uncertainties of the current HES Framework (e.g. 'threshold' and 'non-threshold' standards).
- Discouraging overlap and redundancy in the organisation of a standards framework.
- Offering a systemic underpinning of the standards framework in which potential standard statements can be readily located as part of a coherent whole.

Matters to be accommodated in the Panel's approach

The Panel hopes to give consideration to the characteristics of higher education providers as; (i) a prelude to considering whether standards for particular characteristics should be developed, and (ii) an improved organising framework for future standards that obviates some of the current challenges.

In taking this approach, the Panel is cognisant of several challenges that will need to be accommodated. These include:

- **Different types of provider:** The Panel recognises that there are different types of provider and that their circumstances and characteristics will vary considerably, e.g. in both the scope and scale of their activities. In the first instance, the Panel proposes to map the characteristics of a comprehensive provider that is (i) a 'going concern' (*i.e.* has graduates from its programs who are able to provide feedback on their experiences during their programs and afterwards) and (ii) is engaged comprehensively in research. This detailed map of characteristics can then be varied for other circumstances such as for recently-established providers who are not yet a going concern, or those with a narrower scope of activities, such as those with fewer courses of study or only modest or no research activities.
- **Different models of access and delivery:** In mapping the characteristics of higher education provision, the Panel will seek to do so in ways and at levels that will accommodate any reasonably anticipated approach to delivery of education that is able to demonstrate quality outcomes.
- **Necessity:** The Panel sees a comprehensive mapping exercise of the characteristics of higher education provision as an opportunity to re-focus on the need for standard statements, taking into account factors including risks to quality, models of provision and the need to specify the minimum levels of performance that are acceptable for Australian higher education provision.
- **Coherency:** While the Panel proposes to ground the development of standards systemically in the characteristics of higher education provision, the resultant standards will not necessarily embrace all characteristics because e.g. certain characteristics may be deemed of little risk to quality outcomes. Nonetheless the standards that are developed will still need to retain an overall coherency that is meaningful to users of the standards.

- **Broad application:** The Panel notes that providers may differ in their approach to provision of higher education. However, where equivalent outcomes are sought (e.g. course learning outcomes), equivalent processes are utilised (e.g. on-line delivery), or similar functions are in place (e.g. support for diverse cohorts of students), the same standards should apply across all providers that exhibit similar characteristics, irrespective of how the providers may otherwise differ in their ways of operating or in their operating contexts. For example, all providers that carry out research should be subject to the same minimum standards for research.
- **Segmentation of standards:** The Panel notes the segmentation of the current Threshold Standards (e.g. provider standards and qualification standards) and of the HES Framework (threshold and non-threshold standards). The Panel's proposed approach to organising future standards may point to ways the current segmentation can be streamlined to some extent to benefit the users of the standards, such as reducing overlap and duplication.
- **Professional accreditation:** In so far as professional accrediting bodies may have an interest in the standards for higher education providers, the Panel hopes that grounding the standards in the characteristics of providers may be helpful to professional accrediting bodies.

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:

THE NEW EMAIL ADDRESS info@HEstandards.gov.au.

Alan Robson
Chair
Higher Education Standards Panel
November 2012

Distribution of Communiques

Until such time as the Panel's website has been completed, it would be helpful if the existing addressees of the Panel's Communiques could look to passing each Communique on to interested parties within their constituencies. Anyone who wishes to be added to the distribution list can contact the email address above.