



# Higher Education Standards Panel

## Communique Number 8 – May 2013

### Introduction

Welcome to the eighth Communique from the Higher Education Standards Panel (the Panel). The purpose of this Communique is to:

- respond to feedback received about the concept of Reference Points that are proposed to be included with the revised Higher Education Standards (see Call for Comment Number 1 at <http://www.HEstandards.gov.au>), and
- provide the sector with some additional background on the Panel's proposed organising framework for the revised Higher Education Standards.

### Reference Points

The Panel has noted feedback from the sector pointing out that the current Threshold Standards give little indication about how they are to be interpreted. The Panel is of the view that for most higher education providers it will be relatively clear how most standards might be achieved and this view has been put to the Panel by a number of providers.

On the other hand, the Panel is aware of various materials that it sees as likely to be of value to providers in thinking about the achievement of particular standards. The Panel is proposing to include a reference to such materials in the revised standards. The materials will be called 'Reference Points'.

In the light of feedback received on the inaugural Call for Comment, the Panel has refined its definition of Reference Points as:

*Significant codes or frameworks that the Higher Education Standards Panel judges to be of relevance to providers in considering how particular standards may be met or demonstrated.*

- Reference Points are an important adjunct to the Higher Education Standards but are not themselves standards statements.
- Generally, the items listed as Reference Points are developed and maintained by peak national bodies and agencies.
- The Higher Education Standards Panel does not intend to create or maintain the items listed as Reference Points.

The Panel notes that the concept of reference points was broadly supported in feedback on an earlier DEEWR discussion paper (see Panel Communique Number 3). The Panel's initial Call for Comment (Number 1 March 2013) also elicited broad support for the concept, albeit with some questions about the detailed application of the concept, how reference points may be approached by TEQSA and the use of the Australian Qualifications Framework (AQF) as a Reference Point.

In view of the overall supportive feedback provided by stakeholders, the Panel is proposing to continue to develop the concept of Reference Points, taking note of issues raised by stakeholders.

### Issues raised on Reference Points

**Definitions:** Several respondents noted the importance of a clear definition of Reference Points in the proposed HES Framework, including clarity about the use of Reference Points being at the discretion of the provider and that compliance with the content of reference points is not a regulatory requirement. The Panel agrees with these views.

**Inclusion of Reference Points within standards statements:** Some respondents cautioned against naming reference points *within* standards statements, lest they be interpreted as standards. This view is accepted by the Panel.

**Reference Points and evidence of compliance:** A number of respondents interpreted Reference Points as items that might be used as ‘evidence of compliance’, sometimes going on to list other ‘forms of evidence’. Reference Points are not intended by the Panel to be lists of ‘evidence’. Rather, the Panel is suggesting material that providers may contemplate in seeking to achieve particular standards. Although this may result in adoption of an approach suggested in a Reference Point to achieve a standard, it is not intended that consideration of a Reference Point is mandatory. Nor is it intended to prescribe the form of evidence that a provider may choose to demonstrate compliance. The Panel has noted the wish of some providers to accommodate types of ‘evidence’ within standards and will give this further consideration. Such ‘evidence’ would however be different in intent from the Panel’s concept of Reference Points.

**Use of Reference Points in TEQSA’s regulatory activities:** In listing Reference Points, the Panel does not intend reference points to direct regulatory judgment or mandate how standards must be met.

**Standing of Reference Points:** Some respondents felt that the standing of reference points needed to be clarified. Some potential Reference Points, such as the AQF, were seen by some respondents to have greater status than others. Some respondents felt that identification as reference points might elevate the status of some material unduly, with potential unintended consequences e.g. the accreditation requirements of professional bodies. Reference to the work of discipline scholars was also seen to potentially disadvantage disciplines for which learning outcome statements have not been developed. The Panel notes these views and is considering its next steps in this respect.

**Range of Reference Points:** Many respondents suggested other reference points, particularly internal reference points and benchmarking processes. The Panel regards these types of potential reference points as part of a provider’s normal business practices and quality assurance processes. The Panel does not believe it should list Reference Points of this type unless they are nationally applicable. Nor does it wish to intrude into the internal practices of providers in a way that might affect the types of ‘reference points’ that are chosen by providers for their own purposes.

**Classes of Reference Points:** Following consideration of feedback on possible types of reference points, the Panel currently sees three broad classes of Reference Points as useful:

- Published national documents (e.g. the Australian Code for the Responsible Conduct of Research, Australian Qualifications Framework)
- Outcomes of national comparators (e.g. Excellence in Research Australia and potential future national surveys)
- Bodies of work that have a bearing on courses of study (e.g. learning outcome statements for particular fields of education, accreditation requirements and the like developed by discipline communities and professional bodies – to be listed generally rather than by discipline)

**International and statutory Reference Points:** The Panel does not intend to include international Reference Points, e.g. Bologna models, in the Australian HES Framework. This does not preclude their use among the provider’s chosen ‘international comparators’. Nor does the Panel wish to list Reference Points where there is already a statutory obligation to comply e.g. *TEQSA Act*, ESOS National Code.

**Specificity of Reference Points:** The Panel does not believe the HES Framework should operate at the level of specificity of disciplines or fields of education or research. In that context, it does not propose to list Reference Points pertaining specifically to a particular discipline e.g. the accreditation requirements for Accountancy or the learning outcomes statements developed for Law. The Panel may however wish to point more generally and collectively to such work e.g. see previously circulated draft standards.

**The AQF as a Reference Point:** The Panel is of the view that the AQF is helpful as a reference point for course design and learning outcomes and has suggested it be listed as such in these standards. This approach raised concerns about whether this would be the only part of the standards

framework where the AQF will be mentioned and the possibility of diminishing the standing of the AQF provided by the current Qualification Standards. The standards for Course Design and Learning Outcomes will not be the only place that the AQF is mentioned and the Panel is contemplating what revisions to the current Qualification Standards may be warranted. The results of the Panel's deliberations will become evident in further draft standards to be released for comment.

## Organising Framework for Revised Standards

As outlined in previous communiques (e.g. Communiques Number 4&5) the Panel is using a 'map' of the characteristics of higher education provision and a set of decision criteria to consider if it believes standards are warranted for particular characteristics of higher education provision. In so doing, the Panel has noted other organising frameworks including suggestions from respondents to Call for Comment No. 1.

As will be evident from the attached framework, it is proposed to cluster the revised standards in like aspects of provision such as the environment offered by the provider, the critical academic inputs to teaching, research and research training, quality assurance, the governance and management of the provider's operations and, last, how the provider represents itself and meets the information needs of students and others. The Panel believes that this process has led to a workable revised framework for the proposed standards.

In overview, the proposed framework (**See Attachment 1**) consists of eight components:

1. **Participation and Attainment:** (commencing with admission and progressing through to achievement of specified learning outcomes and the award of a certified qualification).
2. **Learning Environment:** (the type of environment provided to facilitate learning, provide equitable opportunities, foster wellbeing and resolve complaints)
3. **Teaching:** (course design and course delivery)
4. **Research:** (research and research training – for providers undertaking research)
5. **Quality Assurance:** (course accreditation, academic integrity, external referencing, monitoring, review and improvement)
6. **Governance:** (academic and corporate governance)
7. **Management:** (various management systems)
8. **Representation and Information:** (how the provider represents itself, information provided to meet the needs of students and information about the provider in the public domain).

The Panel believes that placing the educational participation of students and the outcomes attained as the first item in the framework is an important symbol and focus for the standards. The Panel is still considering other aspects of the current HES Framework such as the requirements of an entity for registration, provider categories and criteria for a self-accrediting authority. Further communications on these matters will be released in due course.

## Providing Feedback to the Panel

If you wish to provide feedback on any matter raised in this or any other communique, or on other matters to do with developing standards, the Panel can be contacted at any time via the Higher Education Standards Executive at:

**EMAIL ADDRESS**     [info@Hestandards.gov.au](mailto:info@Hestandards.gov.au)

The Panel is grateful for the cooperation and support it has received to date and looks forward to continuing to engage with the sector and other stakeholders.

### Distribution of Communiques

It would be helpful if the existing addressees of the Panel's communiques could look to passing the communiques on to interested parties within their constituencies. Anyone who wishes to be added to the distribution list can contact the email address above. Copies of communiques will be uploaded to the Panel's website as soon as practicable after distribution.

## Attachment 1: Proposed Framework for Standards for Higher Education

<b>Australian Higher Education Standards Framework</b>	
<b>Standards for Higher Education *</b>	
<b>Topic</b>	<b>Envisaged Categories of Standards</b>
1. Participation and Attainment	1.1 Admission 1.2 Credit and Recognition of Prior Learning 1.3 Orientation and Transition 1.4 Progression 1.5 Learning Outcomes (Coursework) 1.6 Learning Outcomes (Research Training) 1.7 Qualification 1.8 Certification
2. Learning Environment	2.1 Facilities 2.2 Learning Resources 2.3 Equity and Opportunity 2.4 Wellbeing and Safety 2.5 Complaints and Grievances
3. Teaching	3.1 Course Design 3.2 Course Delivery
4. Research and Research Training	4.1 Research 4.2 Research Training
5. Quality Assurance	5.1 Approval and Accreditation 5.2 Academic Integrity 5.3 External Referencing 5.4 Monitoring, Review and Improvement
6. Governance	6.1 Corporate Governance 6.2 Academic Governance
7. Management**  ** Sub-headings 7.1-7.5 are indicative only	7.1 Planning 7.2 People 7.3 Financial Management 7.4 Risk Management 7.5 Information Management
8. Representation and Information	8.1 Provider Representation 8.2 Information for Students 8.3 Provider Information

\* This framework is a working model that is subject to review and refinement in the light of feedback from stakeholders and assessment of its utility and coherency as further draft standards are developed.

Alan Robson  
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