Submission to Teaching and Learning Standards Discussion

Chair of the Higher Education Standards Panel
Via: teqsa@deewr.gov.au

22 July 2010

Dear Sir/Madam,

Thank you for giving The Australian Council of Deans of Education the opportunity to respond to the discussion paper: *Developing a Framework for Teaching and Learning Standards in Australian Higher Education and the role of TEQSA discussion paper*. We have arranged our comments by the Discussion Points suggested in the paper; and include some additional points in the Executive Summary.

ACDE has received feedback from more than a dozen Teaching and Learning experts in the discipline of Education in Australian Universities. The recently-formed Network of Associate Deans of Learning and Teaching in the Discipline of Education (NADLATE) has driven the process and I acknowledge the leadership of the Professor Brenda Cherednichenko in providing this response on behalf of ACDE.

Our intention throughout this submission is to provide constructive advice and we would warmly welcome future engagement with the TEQSA Commission.

Yours sincerely,

Professor Toni Downes
President of the Australian Council of Deans of Education

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Main Comments

ACDE commends the ambition and scope of the Discussion Paper and, in particular, the respect for institutional diversity expressed therein. Nonetheless, challenges emerge from some issues raised, for instance in testing generic skills. Parts of the proposed approach also pose difficulties, such as separating teaching and learning standards.

Looking through a wider lens, ACDE is concerned that quality is being defined within an audit culture rather than a focus on quality improvement through developing an environment that would be associated with enhanced conditions for teaching and learning. We urge TEQSA to seek a broader and more comprehensive view of quality.

There has been an admirable effort by the authors to refer to the broad standards landscape while at the same time working towards brevity. Despite this, ACDE would expect to see a more prominent standing given to the achievements of the ALTC's Learning and Teaching Academic Standards project.

ACDE is disappointed that the role of assessment of the achievement of the standards and the risk of perverse incentives in 'teaching to the test' has not been addressed. Specifically ACDE is concerned that assessment of learning outcomes would disregard the very diversity the standards are attempting to embrace. A commitment to not introduce a rankings table made now unfortunately does not allay our concerns as the history of such processes does not afford much optimism (for instance, journal rankings and research strengths).

ACDE would welcome a recognised enhanced role of research in the identification of standards and in understanding the way in which standards will improve learning. Similarly, we encourage TEQSA to acknowledge the agency of learners and their distinct role in their learning. Overall, there is lingering uncertainty over TEQSA's approach to its stakeholders. ACDE urges that a comprehensive Stakeholder Management Strategy be developed for external consultation.

Reviewing the standards proposal beyond the paper's discussion points, ACDE believes there is a lack of clarity as to whether courses with international accreditation (alongside national accreditation) are going to be assessed against standards. A vision for and the significance of standards in positioning Australia, not individual universities, in the international context should be addressed.

Additionally, ACDE would welcome clarification on whether TEQSA propose to link performance funding to the achievement of standards. Allied to this, ACDE is interested as to whether TEQSA has considered, or intends to consider, including improvement based funding as well.

SECTION 1: THE POLICY CONTEXT FOR NATIONAL TEACHING AND LEARNING STANDARDS

ACDE welcomes the move to a national approach to setting teaching and learning standards and broadly endorses the definitions of teaching and learning standards. However, we must emphasise the importance of diversity and of reflecting defined discipline, knowledge and skills areas. Fitness for purpose is an important principle that we believe has not been satisfactorily enshrined within the Discussion Paper.

ACDE recognises the importance of separating the Standards Panel from the Commission, thus separating the QI and Regulatory functions of TEQSA. However, ACDE is concerned that the Standards Panel must be constituted in such a way that gives it the expertise and represents the depth of scholarship to make informed judgements across a wide range of disciplines and a diversity of institutions.

Discussion Point 1:   Does the proposed definition of teaching and learning standards provide a firm conceptual base for the development of a framework? Does it provide clarity for the purpose of communications between institutions, TEQSA and other involved parties? Is there a better definition that could be used?

The proposed definition provides a starting point from which to arrive at a conceptual base for the development of a framework. While Discussion Point 2 reflects on the separation of teaching and learning standards, it is worth commenting here that this divergence introduces a challenge in understanding the balancing act academics face. A clear explanation of areas of overlap and synergy must be provided by TEQSA should the proposed split be approved. While this distinction must be made clear the connections have to be foremost in the establishment of standards.

The current teaching standards domain would appear to encompass all that does not fall within the learning outcomes arena. Despite its breadth, the proposed definition of teaching standards neglects to mention that those standards also "apply to desired areas of knowledge and skills," and will be influenced and modulated by specific disciplinary approaches and professional contexts.

The learning standards definition focuses on outcomes. There is merit in this approach but ACDE is strongly concerned that in not recognising the learning process a crucial understanding of what leads to strong outcomes will be passed over - particularly in its relation to higher order thinking and more complex understandings of learning. Moreover, the process of student learning is so often the key to unlocking a disposition towards lifelong learning, which is a focus of university work. 'Value' outcomes such as this appear to be missing from the current proposed standards landscape.

The policy context dominates the standards scene. A challenge facing TEQSA is achieving clarity in terms of describing accountability and quality assurance functions as well as those relating to the

improvement of teaching and learning. If the two functions become confused or conflated in the minds of those charged with implementation then it will be to the detriment of the improvement of teaching and learning.

Fundamentally, ACDE asserts that the standards discussion must address the relationship between the structure of standards and the agency of learners and teachers. Learning and teaching are social practices, influenced by process and environment, as well as the individuals and their own educational and social capital.

Discussion Point 2: It is proposed that teaching standards and learning standards are conceptually distinct and therefore require consideration as separate sub-domains for TEQSA quality assurance and regulatory activities. Are there any problems with creating two sub-domains of this kind?

The distinction is important in describing the features that are unique to each sub-domain. Problems arise if the distinction conceals the relationship between teaching and learning.

Some of the complexities of the relationship are captured in the University of Western Sydney's Academic Standards Framework (see Appendix 1 for more details). This framework focuses on achieving course-level learning outcomes through the setting of appropriate design, support and delivery standards.

However, taking a constructive stance, the opportunity provided by this proposed distinction is that academics unpack the characteristics of teaching compared to learning in order to better understand the complexity of the relationship, its co-dependencies and influences. By so doing, there is the potential to make better strategic decisions when targeting areas for improvement related to teaching or learning.

This important research work would be accommodated within the 'teaching for learning' field. Indeed, its underpinning principles can be instructive now in responding to this Discussion Point. Since students generally learn what they practice, it is helpful for the teacher to consider how closely related the learning tasks are to desired learning outcomes. Barnett, R., & Coate, K. (2005)[1] discuss this further and demonstrate how the discipline (knowing, acting, being) shapes the way curriculum is designed and delivered.

Discussion Point 3: Are the seven principles for TEQSA's role within a national teaching and learning standards framework appropriate?

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[1] Barnett, R., & Coate, K. (2005). Engaging the Curriculum in Higher Education. Maidenhead, Berkshire: Open University Press and The Society for Research into Higher Education.

The principles seem broadly appropriate, however careful analysis reveals some important likely implications. Their full functionality will only be revealed in the implementation process and we presume that they will be revised as implementation proceeds.

Principle 2 As stated under Discussion Point 1, the student learning outcomes referred to in Principle 2 are focussed on a narrow view of knowledge and skills rather than a more effectual broader view encompassing the learning process and the application of knowledge and skills in situ and over time. These elements as described defy the notion of a traditional test.

The development of discipline-specific knowledge, values and ethics must not be overlooked, especially for professional disciplines – of which education is just one amongst many, such as engineering, law and medicine. The Discussion Paper may intend to capture such student outcomes within 'Generic Skills'. Our concern is that this sub-category will reflect lowest-common-denominator skills without due regard to the diversity of disciplines or of the student population. Two pieces of seminal work by Donald Schön[2] support this assertion.

Going forward, ACDE expects TEQSA to explain, through its principles, how standards relate to the various sets of learning descriptors from graduate attributes, to key competencies, professional standards and existing discipline standards. More than this, ACDE would want to see that the standards are not set lower than other learning descriptors.

In **Principle 3,** we welcome the acknowledgement that TEQSA is "not the only custodian of standards". Despite this, TEQSA will have to convey its recognition of the diversity of stakeholders and their viewpoints on standards while conducting its role of reviewing teaching and learning standards. ACDE recommends the adoption of a Stakeholder Management Strategy (SMS) that defines the responsibilities and relationships of stakeholders. However, as is the case for all seven Principles, actions will speak louder than words. The implementation of a SMS will be of uppermost importance.

A point to make with regard to **Principle 4** is that the research activity of higher education should be tapped into in any regular review of standards. The research arena is continually employed in the analysis of change and emerging situations, and the role of teacher as learner.

Principle 5 prompts a revisiting of the well-rehearsed dilemma in the assessment of standards. TEQSA will face a complex challenge in assuring that its professed respect of institutional diversity and, more importantly, for student and teacher diversity, is not overridden by a system which encourages a threshold passing of national standards. Equivalent regard must be paid to aspirational standards which incorporate the diversity of institutions if we are to drive quality improvement. ACDE is concerned that there will be an unavoidable 'race to the bottom' arising from a system which could be used to rank institutions based on minimum standards.

Principle 7 ACDE is disappointed that the obvious question set by Principle 7 as to whom the 'experts' are to be is not addressed. We will not take this opportunity to provide a list of prospective experts as that is the responsibility of TEQSA. Of course, the experts must represent all States and

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[2] Schön, D. A. (1983). The Reflective Practitioner: How Professionals think in action (First edition, reprinted in 1995 ed.). Hants, England: Arena.
Schön, D. A. (1987). Educating the Reflective Practitioner. San Francisco: Jossey-Bass Publishers.

Territories and be respected in their disciplines. We encourage TEQSA to define what roles the experts will play, and who they envisage them to be. This clarification could be incorporated within the Stakeholder Management Strategy. The Australian Learning and Teaching Council's Learning and Teaching Academic Standards Project provides a sound model from which to base a sound consultative development of standards.

The previous point is one example where the appropriate enactment of the seven principles will have cost implications due to the number of potential players involved in the implementation process at both a national and institutional level.

SECTION 2: A BRIEF REVIEW OF INTERNATIONAL AND DOMESTIC DEVELOPMENTS

ACDE recognises the importance of national and international developments, but also recognises the unique strengths and qualities of Australian higher education.

Priority should be given to learning outcomes. Once these have been established institutions can develop teaching standards to deliver these outcomes. These teaching standards require due consideration of diversity; students, modes of delivery, AQF level and type of course (coursework or research). The teaching standards will also need to encompass a range of types of discipline.

Discussion Point 4: Does this short review omit key developments or trends that are worth considering?

The review provides good coverage of key developments in relation to considering a shift to standards as a basis for quality assurance mechanisms. There are, however, some points worth making in relation to the seven practices outlined.

Measurement of teaching quality could benefit from drawing upon the work of the ALTC-funded Teaching Quality Indicators (TQI) National Project. Though, in many respects, the Teaching Standards Framework is an improvement on the earlier TQI project, there are areas of learning which should be considered. For instance, the institutional audit has been effectively used at RMIT University as a systematic way of defining an unexpected silence or area for improvement within the domain of assessment.

In any cost-benefit considerations of the peer review approach, appropriate weighting should be given towards the value gained from the personal professional understandings and practices of teaching. Peer review and, in particular, moderation of assessment gives space for developing and refining standards. This, and other, techniques are discussed under Point 9.

Discussion Point 5: For the sake of brevity, the review has presented blunt assessments of the utility of various developments. Are any of these assessments inaccurate or misleading?

At times the pursuit of brevity has been at the expense of critical assessment. This conveys an impression that the approaches have been unproblematic and largely without contention. For instance, ACDE contend that too much weight is given to the AQF. It is positioned in the paper as being typical of the Australian context but is in fact quite specific to different professional areas.

In another example, the review is correct in acknowledging that the changes underway as a result of the Bologna process are occurring in a very different context, but it is of concern that the assessment does not disassociate TEQSA from the very real risks across the EU of standardised teaching deliveries and qualifications within a one-size fits all package. Australia has the opportunity to develop and adopt a set of standards which encourages quality improvement. Additionally, ACDE is greatly concerned that a testing regime would unintentionally drive standards lower through a 'teach to the test' approach. We discuss this further in Discussion Point 8

SECTION 3: STEPS TOWARD AUSTRALIAN TEACHING AND LEARNING STANDARDS

ACDE regards the participation of the discipline communities as essential to the achievement of improved student outcomes via a standards process. It endorses the approach taken through the ALTC Discipline Scholar Project and sees the process of peer referenced expert review and judgement as an essential element in determining and assuring teaching and learning standards.

Teaching standards and learning standards are only to a degree conceptually distinct. There is an inescapable dialogical nexus between the two. Certainly in practice one cannot be considered for monitoring and evaluation without consideration of the other. Indeed, when the relationship between teaching standards and learning standards is subject to critical investigation the nexus between the two tends to become more, rather than less, involved.

Discussion Point 6:   Is the broad architecture of relationships depicted in Figure 1 an appropriate basis for the development of a standards framework?

The architecture provides a starting point. It appears to have been designed with simplicity in mind. The diagram omits the important overlap between research and teaching/learning as well as the input of key stakeholders such as students and academic unions.

The diagram could be interpreted as elevating the relative importance of the accountability and regulatory functions of TEQSA. It is critical that these functions do not become dominant and make the improvement of teaching and learning secondary.

Discussion Point 7:   Is the approach suggested for structuring standards statements in Figure 2 a viable way to proceed?

As is the case with much of the approaches suggested in the discussion paper, the interpretation of these statements in implementation will be critically important. There may be a disconnect between institutional and TEQSA interpretation and the standards regimes should allow for this.

The concept of unpacking standards into the hierarchy of categories, statements and reference points is a promising proposal. Each institution should be required to interpret these within the context of the diversity of their respective institutions. It is unclear how the standards statements translate to evidence for 'measuring, assessing and reporting' on the standards category. The role of reference points is also somewhat ambiguous. If they are 'least prescriptive' yet, at the same time are 'priority areas', this would appear to contain a contradiction. The precise interactions between the terms introduced should be explained, especially in relation to testing.

A further cautionary note is that there is a strong inference that the statements may unwittingly advance a checklist approach of compliance and the pursuit of minimum standards rather than a culture of continuous improvement.

Discussion Point 8:   What role does testing of generic or discipline-based knowledge and skills using common instruments have to play in ensuring, monitoring and demonstrating learning standards in Australia?

The testing of generic or discipline-based knowledge and skills using common instruments has a minimal role to play in improving the quality of teaching and learning. The testing of generic skills may be useful within universities but could lead to perverse outcomes if adopted between institutions. The temptation of 'teaching to the test' in order to meet generic standards would become overwhelming. This becomes privileged at the expense of wider educational goals.

ACDE believes that there can be value in testing for the purposes of diagnostics, to inform and drive learning, as well as to develop indicators of what has been learned. However, it is not possible to know what was learned, and thus drive quality improvement, unless there is formative and summative assessment. We again raise the spectre of a 'race to the bottom' driven by an ostensible achievement of outcomes. Any system which can be used to rank institutions will be subject to overwhelming political pressure to do just that; the creation of compulsory 'losers' will then become unavoidable, and misleading.

This risk can be mitigated by maintenance of rigorous process standards. TEQSA must provide clarity on its intentions in this regard, especially given the apparent contradiction with the embrace of diversity as stated in Figure 2.

Discussion Point 9:   Are there other possible measures or indicators that should be considered?

ACDE believes that the best way of ensuring, monitoring and demonstrating learning standards is to engage in relatively costly but defensible (representative) moderation processes within disciplines/professions and across institutions.

The focus should be on improving assessment practices and assuring the validity and reliability of those practices. It is through discussion of teaching, learning and assessment practice that the capability of tertiary educators is improved along with the capability at the institutional level.

In resolving this issue TEQSA must first consider and communicate the purpose for a standards approach to regulation and quality improvement. It is currently not clear if it is to be used to assure and promote the quality of Australian higher education to domestic and overseas stakeholders, drive quality improvement, or both. An iterative, developmental and institutionally relevant system will meet both objectives if implemented effectively.

Discussion Point 10: How should TEQSA utilise expert review, both for review of teaching standards and for review of learning standards, in ways that are time and cost-effective?

The blueprint for this work should be the ALTC's Learning and Teaching Academic Standards Project where academics are provided with resources to develop and agree standards within their own disciplines. This approach has commitment from other disciplines and has been proven to deliver appropriate threshold standards.

ACDE also commends the inclusion of the research community in reviewing standards. The prospect of a virtuous cycle whereby research work contributes towards better standards; and standards directs research focus in the pursuit of better teaching and learning pedagogies is an opportunity that TEQSA should grasp.

Appendix 1

UWS Academic Standards and Assessment Framework for Learning and Teaching

This Appendix contains information contained in pages 22-23 of the UWS AUQA Performance Portfolio, February 2010. Permission has been granted for its reproduction by Geoff Scott, Pro-Vice Chancellor (Quality) at the University of Western Sydney.

The framework has two components. The top half identifies what UWS gives focus to in seeking to assure academic standards for learning, teaching and assessment. The lower half represents how the University goes about ensuring these standards are applied, tracked and improved consistently and effectively. It is the careful and consistent attention to both areas that is seen by UWS to provide for effective academic quality management and assurance.

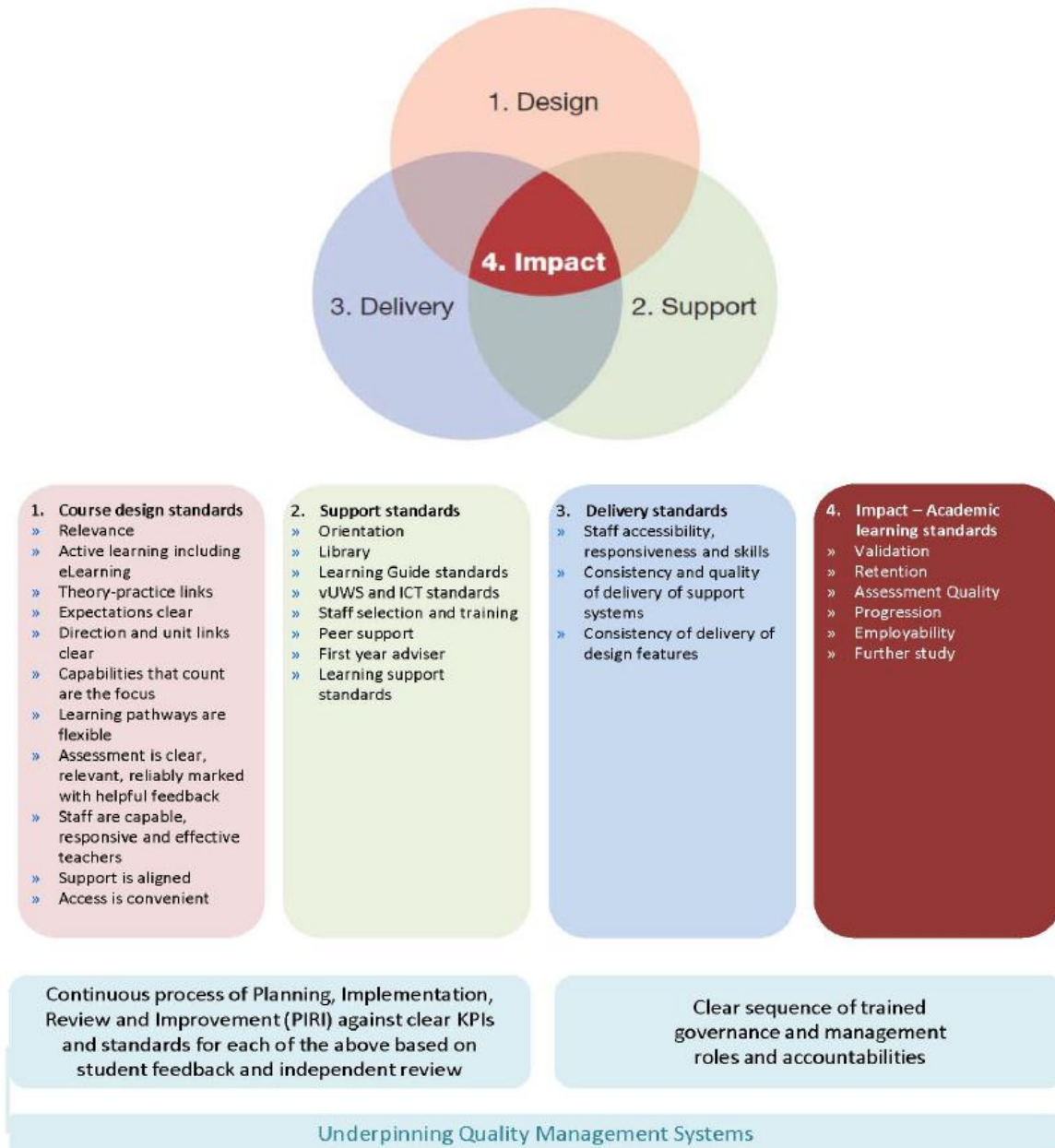The UWS framework has four interlocking domains, each with its own set of standards:

(1) Course design

(2) Learning support

(3) Delivery

(4) Learning outcomes and assessment (impact)

Whereas domains one and two are concerned with assuring the quality and standards of inputs, domains three and four are more focused on the quality of outcomes. UWS sees that the key test of Learning and Teaching quality and standards resides in the fourth domain (achieving a demonstrably positive impact on the capabilities of our graduates).

Because of this, giving focus to validated course-level learning outcomes (4), using a suite of external and institutional reference-points, is a key first step in course development. The University seeks to design engaging courses (1) against these learning outcomes so as to progressively build student achievement whilst ensuring that there is aligned support (2) and consistent delivery (3). In doing this, UWS aims to ensure that design, support and delivery decisions are not only relevant, but also aligned, mutually reinforcing, outcomes-focused and evidence-based.

The University recognises that what matters to students is the combined and consistent quality of all four domains (i.e. the total university experience), and that it is the extent to which standards in all four areas are effectively and consistently addressed that determines the quality of graduates. When new programs are designed using the framework, concurrent attention is given to all four standards areas. For example, if a course design includes interactive, online learning then the capacity of the UWS ICT support systems and infrastructure to deliver this effectively must be confirmed before the course is approved. Similarly, if the course requires staff with a particular profile, their availability to deliver the course must be confirmed before the course is approved.

Ensuring that the framework is applied consistently and effectively is a major improvement challenge not only for multi-campus universities like UWS but across the sector.

1. **Course design standards**
   » Relevance
   » Active learning including eLearning
   » Theory-practice links
   » Expectations clear
   » Direction and unit links clear
   » Capabilities that count are the focus
   » Learning pathways are flexible
   » Assessment is clear, relevant, reliably marked with helpful feedback
   » Staff are capable, responsive and effective teachers
   » Support is aligned
   » Access is convenient

2. **Support standards**
   » Orientation
   » Library
   » Learning Guide standards
   » vUWS and ICT standards
   » Staff selection and training
   » Peer support
   » First year adviser
   » Learning support standards

3. **Delivery standards**
   » Staff accessibility, responsiveness and skills
   » Consistency and quality of delivery of support systems
   » Consistency of delivery of design features

4. **Impact – Academic learning standards**
   » Validation
   » Retention
   » Assessment Quality
   » Progression
   » Employability
   » Further study

Continuous process of Planning, Implementation, Review and Improvement (PIRI) against clear KPIs and standards for each of the above based on student feedback and independent review

Clear sequence of trained governance and management roles and accountabilities

Underpinning Quality Management Systems

The design, support, delivery and impact standards that make up the framework are built on the strategies known to engage, support and retain students in productive learning (Section 2.2.1). The lower section of the framework sets out the key enablers for ensuring that implementation is consistent and effective, and is effectively tracked and improved. This is based on the Plan,

Implement, Review and Improve (PIRI) framework outlined in Section 1.2.1. A critical element of the PIRI approach is clear accountability, training and support for governance groups and managers.

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