Australian Catholic University

Feedback to the Tertiary Education Quality and Standards Agency (TEQSA)

Consultation on Revised Compliance Guides

November 2021

Feedback to the TEQSA Consultation on Revised Compliance Guides

Australian Catholic University (ACU) acknowledges the opportunity to provide feedback to TEQSA in response to its consultation on revised compliance guides on Scholarship, Admissions (Coursework), and Work-integrated Learning ("Guides").

Overall, ACU considers the content of the Guides as presented are relatively clear and non-prescriptive. They provide key information to aid the ongoing development and implementation of policy and process in each domain. Rather than prescribing policy, they appropriately identify key areas for consideration by providers.

ACU, however, objects to the proposal to change the title description of the guides from "Guidance Notes", as originally envisaged, to "Compliance Guides". This is likely to create confusion on the role the Guides play in relation to regulatory compliance.

ACU recommends TEQSA:
- revert to the original description of "Guidance Notes"; and
- provide clarification to higher education providers on the underlying role of the Guides.

In many cases, the application of standards requires expert reviews and assessments of a spectrum of activities across the sector; for example, approaches to the teaching-research nexus, undertaking cohort analysis etc. The proposed name change appears to indicate the Guides will play a bigger role in the assessment of providers against the Standards. Describing them as "Compliance Guides" presents a risk that they will be misinterpreted as an articulation of the actual standards, when they are merely an explanation of how the regulator applies the standards. TEQSA has itself previously indicated this is not the underlying intention, rather, they are to serve as guides. It would also be inappropriate for the Guides to be utilised as regulatory or quasi-regulatory standards. If there is any intention for them to become formal compliance requirements, the necessary review and implementation processes must be followed; they should be subject to government scrutiny and the legislative reform process. TEQSA does not establish the standards.

ACU provides the following feedback on specific provisions in each guide and identifies areas for further attention.

Compliance Guide: Scholarship

ACU is concerned this guide adopts a narrow interpretation of scholarship and recommends a more holistic definition should be adopted in line with the previous TEQSA consultation on this issue. Notably, the Guide asserts:

> *Various aspects are relevant to higher education, but at its core scholarship:*
> - *advances knowledge or professional practice in a field*
> - *transmits advances through contemporary approaches to teaching and learning, and research training if applicable.* (p. 1)

It also states:

> *TEQSA recognises there is no singular definition of scholarship and acknowledges providers may use various approaches to organise the full range of their scholarly activities. However, TEQSA requires evidence of a systematic approach to organising scholarship irrespective of the type of scholarship practised.* (p. 1)

ACU seeks advice from TEQSA on why scholarship has been reduced to the two items listed as "core" aspects. Overall, the Guide promotes an unduly narrow definition of scholarship.

As reflected in TEQSA's 2020 consultation on *Making and assessing claims of scholarship and scholarly activity[1]*, ACU considers the framework developed by Boyer (1990) would provide a broader and more holistic definition of scholarship and scholarly activity. Furthermore, ACU notes the current provisions do not fully represent the notion of scholarship and its impact on student outcomes, which is recognised in the Boyer model. For instance, Boyer appropriately recognises that "...universities and their graduates must connect with the concerns and challenges faced by the wider community".

Significantly, there is a disconnect between the definition in the Guide as it stands and the way the term scholarship is used in the Higher Education Standards Framework (HESF) legislative instrument. The HESF implicitly recognises scholarship as variously relating to developments in a discipline and skills in contemporary teaching. The HESF posits scholarship as sitting alongside research and advances in practice (HESF, 3.2.3.a) and in requiring scholarship to be recent and have currency, (HESF, 3.1.2), articulates with standard expectations of academic discourse. An "activities" based definition of scholarship is reductive and creates the risk of producing a transactional approach to compliance on the part of providers.

ACU recommends adopting the framework developed by Boyer and its four dimensions of scholarship; namely, the scholarship of (i) discovery, (ii) integration, (iii) application or (iv) teaching. As articulated in ACU's submission to TEQSA's previous consultation, the University considers the Boyer model continues to be fit for purpose.[2]

The provisions on scholarship and scholarly activity in the current Guide could also be clarified; providers would require further guidance on demonstrating compliance and best practice. ACU further notes the Guide does not indicate to which staff it would apply (sessional, substantive etc). The revised guide does, however, appear to clarify and/or remove some of the contentious elements that were in the previous version. In the last round of consultation with TEQSA, private providers, for example, noted that the previous version excluded some course improvement activities which they would regard a scholarship.

Engagement in scholarship

With respect to demonstrating engagement with scholarship, the Guide provides:

> *Engagement in scholarship can be considered:*
> - *across a provider (e.g. policy frameworks, resource allocation, institutional expectations, staff development), or*
> - *at the level of individual activity (e.g. part of an individual's personal professional development, teaching, research or professional practice).* (p. 1)

On the latter point, ACU seeks guidance from TEQSA on how an institution can suitably report at the individual level for scholarship.

What TEQSA will look for

The Guide lists a range of different forms of scholarship that TEQSA would expect to see in an environment of scholarly activity (pp. 2-3).

ACU seeks clarification and further advice on how TEQSA would prefer to identify and review such information, and how a provider can best collect and share this sort of information with TEQSA. For instance, is it by written reports and data and/or interviews and observations, or a combined process. It would be useful for providers to have access to proformas for reporting on scholarship, to gain an understanding of what TEQSA has identified as good practice. ACU also notes the initial proposal

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[1] TEQSA. *Discussion Paper: Making and assessing claims of scholarship and scholarly activity* (October 2020).
[2] Australian Catholic University. *Feedback to the Tertiary Education Quality and Standards Agency (TEQSA) – Discussion Paper: Making and assessing claims of scholarship and scholarly activity* (December 2020).

included reporting in relation to the impact on student outcomes. Clarification is sought on whether this is still a relevant requirement.

Regarding course design, the Guide provides that TEQSA will need to be satisfied that "course design has been informed by the appropriate level of relevant scholarship" (p. 2). ACU seeks clarification on this provision. For instance, would disciplinary scholarship meet this standard, or does it require specific teaching and learning scholarship to inform course design.

General observations

ACU considers the commentary around creative practice in the Guide should be reviewed and risks functioning to delegitimise these disciplines. Rather than positing a kind of 'scholarly deficit' in creative practice, it would be better to have the guide align creative practice scholarship requirements to the Research Statement Guidelines tied to Non-Traditional Research Outputs. Furthermore, the "Common Issues" section has a series of observations in parentheses that consistently target the creative arts as exemplars of unrelated research. It is suggested that these references are not necessary. It is sufficient that the onus is on the provider to demonstrate a scholarly link in interdisciplinary activity.

In its present form, the Guide also does not acknowledge that scholarly activity can vary depending on the type and/or level of academic appointment. Specifically, that appropriate scholarly activity might legitimately differ based on different types and levels of academic appointment is broadly missing from the guide. For example, "attendance at conferences" is cited as indicative of insufficient scholarship. While this might be true for a mid-career academic, it seems unreasonable to not value this activity when undertaken by an academic in a tutoring role at the start of their career.

Compliance Guide: Work-integrated Learning

ACU broadly supports the content of this guide, which should facilitate improved student experiences in work-integrated learning (WIL) across the sector. The Guide suitably reiterates the obligations providers have under the Standards and the inherent risks of non-compliance. It is also consistent with the information required for re-registration. ACU makes the following suggestions on how the Guide could be further strengthened and provisions clarified.

WIL activities

The Guide lists several activities that may be taken to encompass WIL. Specifically, it articulates:

> *WIL activities may include:*
> * *professional workplace placements (also known as internships, clinical placements, fieldwork, practicums) whether local, interstate or international,*
> * *online or virtual WIL (e.g. telehealth) with real clients or industry input,*
> * *industry-partnered projects in the classroom (e.g. hackathons, incubators/start-ups) that involve industry, community or professional partners,*
> * *a simulated work environment with industry input, consultation or assessment, or*
> * *activities in other contexts involving industry or community partners.* (p. 1)

ACU recommends also including community engagement and/or community service-related learning in this list. At ACU, for instance, some courses blend community engagement activities and activities such as those listed above into the student experience, which contribute to students' learning outcomes and the development of graduate attributes recognised by TEQSA. As TEQSA articulates, Graduate Attributes are:

> *Generic learning outcomes that refer to transferable, non-discipline specific skills that a graduate may achieve through learning that have application in study, work and life contexts.*[3]

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[3] TEQSA. *Glossary of Terms*. https://www.teqsa.gov.au/glossary-terms

It would be consistent with TEQSA's definition of Graduate Attributes to allow providers to tie WIL activities to both course level learning outcomes and to graduate attributes. ACU also notes that TEQSA has traditionally valued an institution's specific mission and identity, and allowed providers to tailor offerings having regard to their individual missions.

<u>Learning outcomes</u>

The Guide stipulates:

> *In all cases WIL experiences must build towards the learning outcomes of a course and meet other HES Framework requirements such as those regarding staff qualifications, professional accreditation and student support tailored to the needs of the cohort. The specific variations in the form of the WIL activity and the field of study should also be considered in accordance with the HES Framework.* (p. 1)

ACU recommends aligning Learning Outcomes at the unit level, in recognition that the nature of WIL can vary depending on the particular course at hand. This would allow providers to differentiate between year level or type of WIL. This recognises a course may require multiple WIL activities or types with a progressive narrative.

<u>Quality assurance</u>

On quality assurance, the Guide provides:

> *A provider has in place and implements policies and procedures for quality assuring WIL including quality assuring the student experience and external supervision.* (p. 2)

With respect to achieving these outcomes, ACU suggests developing a set of guidelines on quality assurance in WIL for all relevant disciplines, to assist universities with implementation.

<u>Implications for institutions at a policy level</u>

The Guide outlines the aspects of a provider's WIL arrangements which TEQSA is required to consider under the HESF. As the Guide articulates:

> *WIL is covered directly in the HES Framework by Standard 5.4.1 (delivery through other parties is quality assured) and Standards B1.2.9 and B1.3.12 in the category standards (community engagement of University Colleges and Australian Universities to include work-integrated learning and other methods). It is also affected indirectly by requirements of course design such as the methods of assessment being appropriate for the level and nature of learning outcomes (Sections 1.4 and 3.1) and the provider's responsibility for students' welfare (Sections 2.3 and 2.4).* (p. 2)

ACU seeks clarification on whether TEQSA requires universities to have a standalone WIL policy or one that is interconnected with a learning and teaching and assessment policy.

Compliance Guide: Admissions (Coursework)

ACU considers this guide aligns with the HESF and appropriately clarifies relevant requirements. The Guide is clear on the expected relationship between the admissions framework and policy and the relevant Threshold Standards.

ATTACHMENT A - Australian Catholic University Profile

Australian Catholic University (ACU) is a publicly funded Catholic university, open to people of all faiths and of none, and with teaching, learning and research inspired by 2,000 years of Catholic intellectual tradition.

ACU operates as a multi-jurisdictional university with eight campuses, across three states, one territory, and overseas. ACU campuses are located in North Sydney (NSW), Strathfield (NSW), Blacktown (NSW), Canberra (ACT), Melbourne (Victoria), Ballarat (Victoria), Brisbane (QLD), and Rome (Italy).

ACU is the largest Catholic university in the English-speaking world. Today, ACU has around 33,000 students and 2,000 staff.[4]

ACU is ranked first in Australia when it comes to graduate employment outcomes.[5] ACU graduates demonstrate high standards of professional excellence and are also socially responsible, highly employable and committed to active and responsive learning.

ACU has built its reputation in the areas of Health and Education, educating the largest number of undergraduate nursing and teaching students in Australia[6] and serving to meet significant workforce needs in these areas.

ACU has four faculties:
- Health Sciences;
- Education and Arts;
- Law and Business; and
- Theology and Philosophy.

ACU is committed to targeted and quality research. ACU's strategic plan focuses on areas that align with ACU's mission and reflect most of its learning and teaching: Education; Health and Wellbeing; Theology and Philosophy; and Social Justice and the Common Good.

To underpin its research intensification efforts, ACU has appointed high profile leaders to assume the directorships, and work with high calibre members, in its research institutes.[7] ACU is a world-leading research university in its priority areas of education, health, and theology and philosophy.

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[4] Student numbers refer to headcount figures while staff numbers refer to full-time equivalent (FTE).
[5] QILT 2021 Graduate Outcomes Survey, Longitudinal, full-time employment (September 2021).
[6] Department of Education, Skills and Employment, *2019 Higher Education Data Collection – Students, Special Courses*. Section 8, Table 8.3.
[7] See Australian Catholic University, 'Research at ACU' via http://www.acu.edu.au/.