

**Australian Universities Quality Agency**

**AUQA Submission to Higher Education Review, 2008**

**Quality Systems in Australia and the World**

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## **EXECUTIVE SUMMARY**

### **Scope of this Submission**

This submission is confined to areas in which the knowledge, expertise and experience of the Australian Universities Quality Agency (AUQA) is particularly able to contribute to the development of higher education (HE) in Australia. Therefore, the submission concentrates on quality assurance (QA) issues, and relates primarily to sections 3.3, 3.6 and 3.9 of the Discussion Paper.

### **The Global Context**

Throughout the OECD, quality assurance and quality assurance agencies are critical to the development of mass systems of higher education (Vincent-Lancrin, 2006), where performance and accountability are central to the success of the system. The work of QA agencies supports each HE sector in its contribution to economic development and social well-being, to skill enhancement in the workforce, to mobility of students and graduates, and to the international acceptance of graduates. Democracies need to know that they have invested well in their HE systems, and QA agencies have become a major mechanism for providing this assurance.

“Throughout the world, it is now understood that a high-quality system of education is central to the ability of nations to participate successfully in the global knowledge economy” (A.Gurria, OECD Secretary General, 2005).

“As head of an institution, I welcome these [QAA’s] reports and take their comments seriously, as do my colleagues across the sector. We have no intention of risking the loss of our universities’ world-class status” (R.Trainor, President, Universities UK, Principal, King’s College, London)

A national QA body, tailored to the requirements of society and the nature of the HE sector, can provide guidance and support to institutions and validation of the achievement of their goals. This work, together with the QA agencies’ international collaboration, assists in student and graduate mobility. Since its establishment in 2000, AUQA has been independently judged to be:

- valuable nationally as a key contributor to, and established stakeholder within, the higher education sector,
- working with a range of stakeholders of higher education, nationally and internationally, in its continuing role in the development of a robust Australian higher education sector,
- contributing to public policy and debate on quality assurance in higher education, with information and advice, derived both from audit experience and from international engagement in influencing global trends in quality assurance, and
- respected internationally, providing a strong contribution to discussions on quality assurance in higher education, forming relationships with and assisting many countries in establishing quality assurance systems in higher education.

### **This submission**

- outlines the world context for quality assurance in higher education,
- sketches the history and achievements of AUQA, within Australia and in this world context,

- recommends improvements in Australia's quality framework (within which AUQA sits),
- describes AUQA's second cycle of audits of universities and agencies,
- proposes ways of strengthening the attention paid to evaluating and reporting on standards of achievement in Australian higher education, and
- reports positively on the governance and management of AUQA, while suggesting improvements

### **Recommendations**

1. In any future Australian higher education structure, external QA should be based on audit and accreditation, integrated to provide a coherent, consistent, minimalist and non-duplicative system.
2. With its established reputation, recognised internationally, AUQA should continue to be supported as the 'principal national quality assurance body for higher education' (as it is designated by MCEETYA) (section 2.3.3).
3. The 'principal national quality assurance body for higher education' should have greater visibility beyond the senior managements of the higher education sector; and should be acknowledged as the national centre in relation to studying, researching, publishing, training and advising on quality assurance in higher education; and should continue to be funded appropriately to meet its objectives (section 2.3.4).
4. Consideration should be given to dispensing with the term 'self-accrediting institution' (section 3.2).
5. AUQA should be given a co-ordinating role for some of the activities of the state/territory accrediting agencies to achieve greater consistency of accreditation activities across Australia (section 3.3.3).
6. There should be further reflection on the difference between audit and accreditation, so AUQA is the audit body, and other bodies do not carry out audit (section 3.3.3).
7. There should be further attention to a coherent approach to the quality of Australia's transnational education activities, with AUQA playing a significant role in this (section 3.4).
8. As AUQA's core task is auditing institutions against their objectives, AUQA should also be given the task of checking achievement of an institution's 'compact' (if these are introduced as currently envisaged), as they will effectively be part of an institution's objectives (section 4.2.2).
9. AUQA should be commissioned to carry out and/or co-ordinate the work necessary to define standards and enhance the attention given to them (section 5.3).
10. The relation between AUQA and the JCHE should be strengthened (section 6.1).
11. The composition of the AUQA Board should be revised (section 6.2).

## **1. Quality Assurance Systems for Higher Education**

(Section 3.9 and Question 33)

### **1.1 A Worldwide Phenomenon**

The last 20 years have seen a rapid increase in the number of QA agencies world-wide. All developed countries have created one or more national QA bodies and many developing countries have created or are creating a national QA body. This has occurred despite the long-standing regulation of higher education in most countries. Governments have recognised the value of QA agencies in achieving a level of institutional accountability, enhancement and credibility above that which can be derived from regulation alone.

Australia in particular would not be credible internationally without a national QA body, especially in view of

- our very high proportion of international students (and hence high international scrutiny),
- our desire for our graduates to be acceptable internationally, and
- our dependence on immigration and the export of graduate skills, and the consequent value of international relations between QA bodies.

Functions of QA bodies include planning, funding, overseeing a qualifications framework, training, capacity-building, researching, publishing, etc., but the core task of most such bodies is to review the operations of institutions. The most common approaches to such reviews can be characterised as: program accreditation, institution accreditation and institution audit (Danish Evaluation Institute, 2003)

### **1.2 Program Accreditation**

In many jurisdictions, the general maturity level of institutions is low, and the national external quality agency is given the task of accrediting (or at least reviewing) each and every program in the system. Having all programs subject to external accreditation, including accreditation of some programs by professional associations, puts a heavy load on both institutions and quality agencies. Institutions in jurisdictions such as Australia, UK & USA where there are many professional or specialised accreditors find that a very large amount of time is taken up in interacting with these accreditors, even though each individually might have quite reasonable and appropriate requirements. Many countries (such as Indonesia where there are many thousands of programs) are finding that comprehensive program accreditation is an unsustainable load for the national quality agency itself. A current preoccupation of many QA agencies (and their owning governments) is therefore how to reduce this load. An obvious method is to take the Australian route where AUQA audits whole institutions and holds each institution responsible for its QA at sub-institutional level. However, in many systems where program accreditation is an overload, the institutions are not as mature as in Australia and do not have the capacity for internal QA of institutional systems and processes. Other ways being explored are accreditation of clusters of programs or establishment of subordinate QA agencies.

### **1.3 Institutional Accreditation**

The earliest QA bodies were in the USA. They operated – and still do – in accreditation mode, to ensure a threshold of quality across a large and diverse country. In recent years, this approach has been criticised as overbearing and inflexible, without getting to the heart of the real needs of institutions and society, not reporting to the government on outcomes, and irrelevant to the better institutions that are never going to be in danger of losing accreditation. (“To a considerable extent, external academic accountability in the US, mainly in the form of accreditation, has been irrelevant to the improvement of higher education” (Trow, 1994).)

Recent US developments of accreditation have therefore been designed to enhance its utility to institutions not at the threshold. One way in which this is happening is that quality agencies work with institutions to help them to improve in areas nominated by the institution; the most effective initiative (which recently won a national award) is to adopt a more audit-like approach. Dill et al. (1996) recommend that the route to quality assurance must combine “a mutually reinforcing system of institution-based quality assessments of teaching and learning and a system of external academic audits”.

US university presidents recognise the value of external quality assurance: “The nation’s higher education leadership believes strongly in the purposes of accreditation and, despite the sometimes considerable costs that the process entails for institutions, supports it as the premier mechanism for assuring academic quality in the nation. They especially see accreditation as superior to more direct forms of government accountability, either federal or state.” (CHEA, 2006)

### **1.4 Institutional Audit**

The audit mode of external QA emerged in the UK in the late 1980s to acknowledge that a gatekeeper role was not necessary for institutions that had already received a formal and indefinite approval to operate (as in Australia).

The current UK Quality Assurance Agency (QAA) for Higher Education was established in 1997 “to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education” (QAA, 2008). QAA is funded by subscriptions from UK institutions and through contracts with the main UK higher education funding bodies.

The UK quality agencies have had different emphases during the years, but in the late 1990s the QAA was both auditing institutions and assessing all teaching programs. The latter operation was ended by the government when the universities complained of overload. The QAA then added to its institutional audits a requirement for the institution to audit four disciplines (specified by QAA) in addition to the whole of institution audit. These discipline audits have now been terminated, and QAA’s current approach to audit is very similar to AUQA’s Cycle 1 audits.

In planning for AUQA, the Australian government considered carefully the US, UK and New Zealand universities models and rejected accreditation (USA) and the double load of institutional audit and program review (UK). Instead, having regard to the maturity of the

Australian HE system and the strength of internal QA processes, it opted for the light touch NZ audit model for our universities and other self-accrediting institutions (SAIs), with its emphasis on institutional objectives and consequent reinforcement of institutional diversity.

### **1.5 European Developments**

Continental Europe has developed a number of different national systems, mainly designed to reduce governmental 'micro-management' in return for more explicit attention to quality by the institutions themselves. However, in 1999, European ministers of education decided that if Europe was to make an educational mark in the world it should have a more continentally consistent system of higher education. In the Bologna declaration, they announced a commitment to educational mobility within Europe (and saleability of education beyond Europe) which is having implications for the work of European quality agencies.

Quality assurance has been high on the Bologna agenda as a means to encourage mobility and to promote transparency. European Standards and Guidelines (ESG) have now been approved for internal quality assurance within HEIs, for the operation of external QA agencies, and for reviews of QA agencies themselves. Another consequence has been to emphasise accreditation and consistency between national accreditation systems (Heusser, 2007). The desire to introduce common degree structures in the form of Bachelor, Master and PhD degrees also tends towards the establishment of accreditation procedures to check compliance with the commonly agreed structures, despite the observed defects of accreditation.

This move towards accreditation "probably translates to an increasing mistrust of institutions and academic peer review methods" (Amaral, 2007). The aim is to try to achieve comparability between the 'outputs' of institutions across the continent and hence facilitate movement around the European Higher Education Area (EHEA). The European Council on Accreditation (ECA) has brokered mutual recognition between several pairs of European accrediting agencies. "The use of performance indicators and benchmarks is becoming a common practice in European policy implementation, which is congruent with the implementation of accreditation mechanisms, rankings of institutions and the emergence of a stratified EHEA." (Amaral, 2007).

Rankings are becoming an increasing, and increasingly problematic, feature of higher education activity. AUQA is active in this area (eg Stella & Woodhouse, 2006a, 2006b) and will continue to address the issue.

### **1.6 Other Systems**

Various other quality systems focus on, for example:

- national development (South Africa, Taiwan),
- consumer protection (Singapore),
- control of a multitude of private institutions (Malaysia),
- control of public institutions (China),
- control of foreign courses (Hong Kong),
- equivalence of qualifications (New Zealand), or
- improvement and diversity (Australia).

AUQA has a leading role and high reputation in this international QA world. Some evidence of this is presented in section 2.

## **1.7 Summary**

### *1.7.1 Benefits*

There are major benefits for a country in having a national quality agency. The outline above shows that, now and for the foreseeable future, the lack of a quality agency would seriously hinder a country's participation in global activities, because:

- almost all countries will have one or more national quality agencies, and being part of such a QA system will be essential for any institution to be internationally credible, and
- these agencies will increasingly operate internationally, and will increasingly collaborate and recognise each other's actions and decisions.

(Woodhouse, 2006)

A quality agency can provide

- independent validation of good performance,
- independent consultation for improvement,
- incentives for self-inspection and improvement,
- a basis for comparison,
- consumer protection, and
- accountability.

Even in mature systems, accreditation of some sort (possibly by a different name, such as registration or licensing) is usually to be found for its gate-keeping role and to ensure threshold requirements are met. Audit, co-existing with accreditation in an integrated quality assurance system, is an excellent way to support and encourage diversity above the threshold. Quality agencies should not be immutable, but should expect to change character in step with the system (eg from capacity-building, through rigorous accreditation to light-touch auditing).

**Recommendation 1. In any future Australian higher education structure, external QA should be based on audit and accreditation, integrated to provide a coherent, consistent, minimalist and non-duplicative system.**

Section 3 returns to this in more detail.

### *1.7.2 Costs*

The benefits are not free, but the costs can be modest. In Australia, for example, the total cost of maintaining AUQA and its audits is well under \$2 per student per year which is very economical for the international benefits conferred, particularly in view of the level of student fees. An institution might spend a further half a million dollars (including staff time) on its own internal quality review once in every five to six years, but it is still investing only a fraction of one per cent of its operating budget in its quality processes.

A second potential drawback is that some quality agencies in professional disciplines have a tendency to be too cautious, making conservative judgements and hence suppressing

innovation. This can be avoided by giving clear guidance to the review panels, and it is less common in general purpose quality agencies such as AUQA.

Thirdly, some institutions fear that answering to a quality agency might lead to a loss of autonomy, but quality audit actually strengthens and validates autonomy. Audit tests the rigour of an institution's expression of its SAI status, ie its worthiness to control its own academic destiny. Furthermore, USA institutions are fiercely independent despite being subject to the more prescriptive discipline of accreditation.

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## **2. History of AUQA**

(Section 3.9 and Question 33)

### **2.1 Establishment of AUQA**

AUQA was created as an independent not-for-profit company, to be the principal national quality assurance agency in HE. It is owned by the Ministerial Council for Employment, Education, Training and Youth Affairs (MCEETYA) which comprises the relevant ministers from the Federal Government, the six States and two Territories. As mentioned, MCEETYA deliberately selected an audit model for AUQA. This was consistent with the emphasis on processes in 'Quality Assured', the statement of the then Federal Minister of Education.

"Our major competitors have external quality assurance mechanisms and countries in our largest markets look to Government verification of quality standards. ... there is no external review of the quality assurance processes ... we need a system that ... signals to the community and the rest of the world that the quality of the higher education system is assured through a rigorous external audit of university quality assurance processes. ... Review teams will be appointed by the Agency to focus on the appropriateness of quality assurance and improvement plans in relation to institutional contexts and missions ... "

(Kemp, 1999)

Despite this brief, AUQA has been repeatedly criticised for 'looking only at processes'. This is even reiterated in the Discussion Document (Australian Government, 2008, p73), primarily by reference to media commentary, and with the strong statement, without evidence, that this has been "to the detriment of standards". It is not true that AUQA has looked only at processes, and in fact it was AUQA itself that decided that it should also look at outcomes. "Process information is important because individual item information is about the past and present, whereas it is the process information that provides indications for the future. For this reason AUQA's audit is process-based, with outcomes providing information on the effectiveness of the processes." (AUQA Audit Manual v1, 2002, p18)

Nor is it true that AUQA has had any detrimental effect on standards. What such comments fail to acknowledge is that it is the institutions themselves that are the custodians of quality and standards, subject to external validation, and not the external quality agency itself. "It is explicitly the responsibility of the auditee to devise a systematic process for evaluating its objectives. ... [and it] must have in place appropriate quantitative and qualitative measures and indicators." (AUQA Audit Manual v1, 2002, p18)

AUQA created steps for the investigation of standards at the start of the first audit cycle, and has used these to investigate in depth in a selection of institutions. For example, AUQA recommended to the University of Adelaide “that the Academic Board, as a matter of urgency, establish a comprehensive process by which it may assure itself that the University’s undergraduate degrees are of a comparable standard ... with those of other Australian and overseas universities” (AUQA, 2003). (Incidentally, Moodie (2004) argued “that all universities should adopt the quality agency’s recommendation to the University of Adelaide”.)

## **2.2 The Audit Approach**

Consistent with MCEETYA’s preference for quality audit of the type then being implemented in the New Zealand universities, AUQA’s first objective was to “arrange and manage a system of periodic audits of QA arrangements relating to the activities of Australian universities, other self-accrediting institutions (SAIs) and state and territory higher education accreditation bodies”. AUQA built on good practice from around the world to create a customised QA system. The core of AUQA’s audit process is a documented institutional self-review followed by an independent external validation and report.

AUQA audit was voluntary until the Higher Education Support Act was passed, but institutions saw its value, and that it was being implemented sympathetically.

AUQA has embedded the good principles of peer review, while extending it to include a broader range of auditor backgrounds. Characteristic features of AUQA’s approach include:

- overseas members of audit panels. This brings an international perspective to the audit judgements, and shows the willingness of Australia to open its institutions and their quality systems to international scrutiny,
- audit panel members from outside academia. This brings another perspective, and openness to another group of stakeholders,
- a senior AUQA staff member is a member of each panel. This brings specific QA expertise and aids inter-panel consistency,
- two-day training of on-shore auditors and half-day briefing of overseas auditors,
- visits to overseas campuses and partnerships, and to domestic partnerships, as part of each audit,
- close liaison with overseas quality agencies to ensure that all the auditee’s operations are subject to external scrutiny, but without conflicting requirements and with minimal duplication,
- open sessions and in situ interviews during audit visits,
- ‘affirmations’ in AUQA audit reports to recognise matters already discovered by the auditee in its own self-review,
- detailed feedback from auditees after each audit, and
- publication of audit reports and subsequent reports of the auditees’ progress in addressing the affirmations and other recommendations in audit reports.

Three pilot audits were carried out in 2001, and all universities, other SAIs and state / territory / Federal HE accrediting agencies were audited from 2002 through 2007. From the middle of 2005, widespread consultation was held on the nature of a second cycle of audits. Plans were concluded by the middle of 2007, and the second cycle (section 6)

began at the end of that year (the gap being to allow the first universities time to prepare their self-reviews according to the new scheme).

## **2.3 AUQA's Achievements**

### *2.3.1 AUQA's Range of Activities*

Although AUQA's core task was (and is) quality audits, it was quickly expected to do much more. AUQA is a concentration of experts on QA in HE, and is constantly gathering information about the performance of the HE institutions, and it was expected to use this information and skills. Therefore, AUQA introduced an online database of good practices in QA in HE, an annual conference on QA in HE, and a series of publications; staff accept as many requests as possible to speak at national conferences, advise institutions and receive international visitors; and AUQA makes submissions and contributions to all relevant national investigations. AUQA has also achieved a very high international reputation.

Aside from the large volume of visits to overseas partnerships and campuses (which has been largely funded by special purpose federal grants over the last four years), these activities have been supported by the basic MCEETYA formula grant (which was based only on an expectation that audits would be carried out) together with a small amount of consulting income.

### *2.3.2 External Review of AUQA*

In 2005, AUQA commissioned an external independent review, with senior national and international figures on the panel, that made a very positive report on AUQA's performance, its relation to the sector, its achievement of its objectives and vision, and its alignment with INQAAHE's internationally-recognised and widely-used Guidelines of Good Practice for QA agencies.

"The Review Panel considered that AUQA has established a robust quality audit system that is rigorous and generally well-respected. In addition, the Panel considered that AUQA has established detailed and effective procedures for audit that include auditor appointment and training, extensive and thorough investigation, and consistent implementation. In addition, the Review Panel acknowledged that AUQA has successfully delivered a demanding audit schedule since its establishment." (Bateman & Giles, 2006)

Supporting the review's further finding that "There was general acceptance across the higher education sector that AUQA's audits were fair and accurate and that there was reasonable acceptance of the quality of AUQA's judgements" (ibid) is the positive feedback on their respective Cycle 1 audits from over 75% of vice-chancellors.

### *2.3.3 Other Evidence of AUQA's Reputation*

Further evidence for AUQA's success and international reputation include:

- AUQA staff members are sought for senior positions, and invited to chair university review panels, for QA agencies in many countries,
- On request, AUQA created a universities' QA agency for the Kingdom of Bahrain,
- AUQA has central roles in the International Network of Quality Assurance Agencies in Higher Education (Presidency) and the Asia Pacific Quality Network (administration),

- AUQA staff are requested to train auditors/reviewers in other countries and advise other agencies on AUQA's system; while in Australia, AUQA hosts many high profile foreign visitors, attachments to AUQA, and observers on audits, and
- AUQA is frequently requested to provide for comment in the QA field.

#### 2.3.4 Other Achievements

- The first cycle of audits has enabled many universities to strengthen the quality of their core business and enabled them to focus on developing their distinctiveness.
- AUQA was designed to support diversity of institutions and the Cycle 1 audits have done so. If institutions diversify further, AUQA's audit process will continue to support this.
- Diversity, of course, must be built on a firm foundation and, through its audits, its 'thematic analyses' of the audits, and its Good Practice DataBase, AUQA has developed emerging norms for the sector, leading to continuing improvement.
- Australian international education has been further enhanced through AUQA's detailed scrutiny of internationalisation, in both cycle one and the thematically focused cycle two audits.

**Recommendation 2. With its established reputation, recognised internationally, AUQA should continue to be supported as the 'principal national quality assurance body for higher education' (as it is designated by MCEETYA).**

#### 2.3.4 Improvements in the HE System

As the audits of Cycle 1 were drawing to a close, AUQA began to write 'thematic analyses' of the audit reports. These are available on the AUQA website (and more will be published by the end of this year). As the analyses cover audits that occurred over a period of several years, they are not a snapshot in time, but they do reveal both matters in need of continuing attention and matters where improvements have taken place.

Institutions have strengthened their attention to: the quality of overseas operations, the support of graduate students, action on plagiarism, the quality of governance, and the needs of Indigenous students. Most noticeably, they have taken action to give substance to matters (like systematic community engagement) that were in strategic plans but tended to receive only lip-service.

Areas still needing attention include stronger academic control (eg through academic boards), the student experience in the context of increasing class sizes and increasing use of casual staff, English language issues (professional bodies have generally been slow to act on this) and achieving outcomes from benchmarking (section 3.6 of the Discussion Paper).

It is of course difficult to be sure of the extent to which improvements are due to AUQA's work, but the external review panel said that "There was evidence to suggest, from feedback from the higher education sector, that AUQA has had a positive impact in raising the awareness of quality matters, in developing a commitment to quality and quality enhancement across the sector, and also in showcasing good practice within the sector. In general, the fitness-for-purpose model and the peer review approach have been

successfully implemented and have led to 'large scale buy-in' and engagement by the sector. It was the opinion of the Review Panel that AUQA does appear to deliver value for money, with minimal exceptions, and that they should retain in their remit the quality audit function." (Bateman & Giles, 2006).

Also, in preparing for the external review, AUQA did an analysis of progress reports from auditees to that date, and determined that about 85% of recommendations showed evidence of significant action (AUQA, 2005b).

AUQA is increasing the national capacity in QA through the use of its system of trained honorary auditors, as many senior people wish to be associated with the work of AUQA.

**Recommendation 3. The 'principal national quality assurance body for higher education' should have greater visibility beyond the senior managements of the higher education sector; and should be acknowledged as the national centre in relation to studying, researching, publishing, training and advising on quality assurance in higher education; and should continue to be funded appropriately to meet its objectives.**

This is based on a recommendation of AUQA's external review panel.

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### **3. Australia's Quality Framework**

(Section 3.9 & Question 33)

#### **3.1 Overview**

Australia has an extensive national quality system for higher education. The main parts of this system, in addition to the institutions themselves and their representative bodies, are

- the Federal Government, through the Department of Education, Employment and Workplace Relations (DEEWR),
- the Ministerial Council for Employment, Education, Training and Youth Affairs (MCEETYA),
- the Australian Universities Quality Agency (AUQA),
- accrediting agencies/authorities and relevant legislation in each jurisdiction,
- the Australian Qualifications Framework, and
- the National Protocols for HE Approval Processes, devised by MCEETYA and enacted by each jurisdiction.

(AUQA, 2008)

#### **3.2 National Protocols for HE Approval Processes.**

Five Protocols were agreed by MCEETYA in 2000, and a revised set came into force in 2007. The previous Protocol 1 was a national public statement of the criteria that should be satisfied by an institution wishing to become a university, and AUQA took the view that they should also be found in the existing universities. AUQA informed MCEETYA and the AVCC that it would check existing universities against the Protocol 1 requirements. Such a check was actually accreditation (or rather, re-accreditation), but that fact was not apparent

because Protocol 1 was quite rudimentary so the check was almost invisibly embedded in the audit. MCEETYA has now asked AUQA to check institutions against the more extensive revised Protocols, which also have detailed guidelines. The (re-) accreditation character of a comprehensive check against the Protocols is therefore more evident. Issues arising from this check being done by the national audit body are discussed below (section 4.2.2).

Australia's universities, and some other institutions, are designated as 'self-accrediting institutions'. This is a confusing term for many foreign colleagues who assume that it refers to accreditation of the institution as a whole. In fact, the authority to introduce new programs without external prior approval is also a characteristic of many other systems. It might be useful to dispense with the term SAI.

**Recommendation 4. Consideration should be given to dispensing with the term 'self-accrediting institution'.**

### **3.3 Accrediting Agencies**

#### *3.3.1 Context*

Each state and territory and the Federal Government have an accreditation function that checks and enforces the Protocols within the relevant jurisdiction. AUQA is required to audit not only HE institutions but also the HE accrediting agencies. In each case, AUQA's core reference point is the auditee's objectives. Thus, as institutions have different objectives, AUQA's institutional audits support diversity. All AUQA's audits of the agencies, on the other hand, are against implementation of the relevant National Protocols, and so are intended to lead towards national consistency.

The National Protocols and AUQA's audits are the main factors in Australia's handling of the issue of consistency between accreditation bodies in the nine different jurisdictions (which is analogous to the European problem of consistency between countries).

#### *3.3.2 Cycle 1 Audit Outcomes*

AUQA has reported that some agencies are operating more effectively than others, and the recommendations have been in the direction of consistency, with AUQA often recommending the implementation of systems or structures that already exist in other agencies. AUQA has repeatedly urged mutual recognition (now agreed in principle), enhanced accreditor training, simplifying and speeding accreditation processes, strengthening control over overseas operations, and distinction between registration and accreditation. Progress reports are showing attention to these matters.

Throughout the first audit cycle, the agencies were at different stages of legal implementation of the National Protocols, so comparison was quite difficult. In Cycle 2, all agencies will be audited in the same year (2010).

AUQA's original Objective 3 required that AUQA report on accreditation activities more broadly (ie in addition to reporting on the audit of each agency). AUQA produced such a report in 2005 (AUQA, 2005a), as well as being represented in the Reference Group for the Guthrie et al. review of the Protocols. Most of the nine recommendations made by AUQA in its report were taken up in the revision of the Protocols, including the establishment of

criteria for the category of 'non-university self-accrediting institution'. The most notable outstanding recommendation is that it is still not clear whether AUQA's audits are expected to check agencies at a threshold level, or to check whether equivalence exists between jurisdictions.

### *3.3.3 National Co-ordination*

The Australian HE Quality Framework is quite complicated, but probably no more than is necessary for a Federal system. Within this complexity, it is important that there be consistency and co-ordination. The creation of AUQA and the Protocols were means to this end, as was the agreement on mutual recognition between the jurisdictions. Further national consistency could be achieved if further accreditation-related activities were centralised. Following this HE Review, a single national accreditor may be established.

If the jurisdictions retain their individual accrediting powers, as much should be done centrally as possible. For example, in a submission on options for the National Accreditation System, AUQA's Executive Director stated that "AUQA strongly supports any move towards increasing consistency in the national accreditation system." The submission recommended that if the existing accrediting agencies continue, AUQA should provide "a supporting secretariat and training role for the accrediting agencies."

There would also be great value in having a single source of interpretation of the Protocols. National consistency would also be assisted if AUQA were given the responsibility for initial evaluation of applications for SAI or university status. AUQA recommended to MCEETYA/JCHE on this matter in 2005 (AUQA, 2005c, Recommendation 6). The decision would still rest with the jurisdictional minister, who would factor in other policies and considerations.

**Recommendation 5. AUQA should be given a co-ordinating role for some of the activities of the state/territory accrediting agencies, to achieve greater consistency of approval, registration and accreditation activities across Australia**

Some recent decisions have gone in the opposite direction and added unnecessary complexity. For example, the Federal government requires that NSAs with HEP status should be audited, despite already being subject to state/territory accreditation. In order to minimise the external QA load on institutions, HESA now provides that this audit function can be carried out by the accrediting body. Yet, this is an odd provision when the pre-existing accreditation was not seen to provide adequate assurance to the Federal Government about the performance of the HEPs. The result is that the national audit function has now been fragmented. A more coherent approach would be for AUQA to remain as the sole auditing body.

A further fragmentation has occurred because under the revised Protocols a jurisdiction can decide whether a new SAI is to be audited by AUQA or the jurisdiction – yet AUQA was established as the national auditor for all SAIs. AUQA has already recommended on this matter (AUQA, 2005c, Recommendation 1).

Most external QA agencies use a similar sequence of procedures (institution report, expert panel, site visit, agency evaluation, decision) but the detail and manner of implementation

vary. Australian NSAs that have already achieved HEP status and been audited by AUQA (or in the AUQA manner) appreciate the orientation towards engagement and improvement in the audit process compared to accreditation and registration.

**Recommendation 6. There should be further reflection on the difference between audit and accreditation / registration, so AUQA is the audit body, and other bodies do not carry out audit.**

Further simplification could be achieved by adapting a US approach. There, Federal funds flow only to institutions that are accredited by an accreditor that has satisfied certain Federal requirements. In Australia, the Federal government could use AUQA's audits of the agencies (with some extension if thought necessary) to determine whether it is satisfied with a state or territory's accrediting process for funds to flow to students of its accredited NSAs. If the Federal government were not so satisfied, AUQA could carry out audits of those NSAs – as is already the case where a state chooses not to seek audit authority.

### **3.4 International Issues**

(Section 3.6)

AUQA's audit scope is all operations carried out in the auditee's name, including operations abroad. In its audits, AUQA can investigate only a sample of an institution's activities, but within this it has paid special attention to transnational activities, because they are more difficult to carry out successfully (due to distance, culture, and cost factors). As mentioned, improvements in universities' transnational provision have occurred (section 2.3.4), and there have been few serious problems.

#### **3.4.1 Transnational Quality Strategy (TQS)**

In 2005, the Federal Government sought comment on proposals for "A national quality strategy for Australian transnational education (TNE) & training". One proposal was to create a new agency (which was rejected by many respondents). AUQA proposed that "to build on achievements so far, and to avoid the cost of establishing new ones from scratch, AUQA should be the core of an extended QA system for Australian TNE and training. ... AUQA supports the notion of maintaining its whole-of-institution approach to university audit, but also acting as the export quality body for at least the whole of higher education and preferably the whole of post-secondary education." AUQA saw its role in this as co-ordinating the activities of enhanced transnational quality structures for VET and the NSAs.

In November 2005, MCEETYA adopted a 'transnational quality strategy', to be led by a large working group, from which AUQA was actually excluded on the grounds of a potential conflict of interest. The group decided that Australia needed to communicate its quality, collect relevant data, and improve its quality (in that order). The only outcome from the TQS is the publication of a voluntary list of institutions (Auslist) that claim to be adhering to principles of good practice.

The issues identified by the Government in its 2005 discussion paper still exist, so there is a need to re-visit the concept of a coherent approach to the quality of Australia's transnational higher education. A new working group is being set up (July 2008) under the

auspices of the International Education Association of Australia (IEAA) and AUQA is a member.

**Recommendation 7. There should be further attention to a coherent approach to the quality of Australia's transnational education activities, with AUQA playing a significant role in this.**

#### *3.4.2 On-Shore Issues*

Transnational education has been an emphasis in AUQA's first audit cycle. This has related primarily to the Australian institution and its partners and how well they are handling the quality assurance requirements. AUQA has developed a simple framework for its investigation of transnational education. Institutions say this has encouraged and guided improvements in these activities.

In Cycle 2, the attention to transnational aspects will remain, but in addition AUQA will look closely at the provision for on-shore education. AUQA is developing a framework for this investigation, analogous to the TNE one. Attention to on-shore education relates primarily to the student and the student experience. As in other areas, AUQA is concerned that the services are consistent with the promises. Australian institutions are generally good at the initial stages of interaction with foreign students, but many do not maintain this. Prospective students should know, for example, what academic and pastoral support there will be, whether they will mix with Australian students or be a campus with a majority of foreign students, perhaps predominantly from the same country, and so on.

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### **4. Cycle 2 of AUQA Audits** (Section 3.3 & Questions 12-14)

#### ***4.1 Planning for Cycle 2***

Beginning in 2005, AUQA consulted the sector on the form of a second cycle of audits. AUQA's external review panel was also invited to offer suggestions. A first consideration was whether a second cycle would continue to add value, or whether all the utility of audit had been fully achieved by Cycle 1. Similar questions were raised recently about the Research Assessment Exercise in the UK. Initially, people pointed to its achievements, and thought its value was at an end. It became clear, however, that it would be better to change its style than to abolish it. A similar conclusion was reached for AUQA, especially in the light of the extent and nature of external quality assurance around the world (section 1).

Hence, some changes were introduced for the second cycle of AUQA audits, to maintain freshness, variety and value, but without totally changing the nature of the activity. Looking at the nature of external QA world-wide, it appears that there is no one correct way, and that it will always be most effective if there is some variation from cycle to cycle.

## **4.2 The Nature of Cycle 2**

### *4.2.1 Quality Improvement*

On the recommendation of AUQA's external review panel and the AUQA Board, MCEETYA agreed an explicit Mission and new Objectives as AUQA moves into Cycle 2. The Objectives themselves refer more explicitly and appropriately to standards (compared to the old Objective 4).

The objectives also now refer explicitly to quality improvement. Although Kemp (1999) stated that the audits would focus on how "institutions monitor their own performance and use the information gained for ... improvement", the word 'improvement' was not included in AUQA's four initial objectives. Nonetheless, AUQA took the approach of 'accountability through improvement', and not vice versa, and stated that it would encourage and assist the growth of an organisational culture in HE that "is committed to continuous improvement" (AUQA 2002). Thus the inclusion of improvement in the revised mission (Australian Government, 2008, p73) was a recognition of what AUQA had been doing all along.

### *4.2.2 The Scope of Cycle 2*

Specifically, MCEETYA agreed that the Cycle 2 audits of institutions would

1. continue to be 'fitness for purpose' in terms of the institution's own objectives,
2. continue to check institutions against the relevant National Protocols for HE Approval Processes,
3. be more concentrated, allowing increased depth (by focusing on two 'themes'),
4. attempt to report more explicitly on standards being achieved by the institutions, and
5. make greater mention of other external reference points (in addition to the Protocols).

#1 supports diversity, and could be extended to check achievement of the proposed compacts, which are seen as a way of the government moving from a 'one size fits all' approach to institutions.

**Recommendation 8. As AUQA's core task is auditing institutions against their objectives, AUQA should also be given the task of checking achievement of an institution's 'compact' (if these are introduced as currently envisaged), as they will effectively be part of institution's objectives.**

In this way, the checking and validating process will not be fragmented, and AUQA will be able to continue to support new developments and further diversity.

#2 holds institutions accountable to an external requirement (section 3.2).

#3 addresses concerns that if the scope is the whole institution, little can be investigated in detail.

#4. AUQA investigated standards and benchmarking in Cycle 1, but institutions were mostly advised to improve their work in this area. It is hoped that the Cycle 2 audits will provide evidence of such improvement.

#5. This is related to MCEETYA's desire for outcomes to be reported, as reference points wider than the institution itself are needed to interpret outcomes. The number of external

reference points is proliferating. It might be helpful to institutions if they were gathered as a coherent guide.

This combination of tasks is not easily implemented because a 'whole of Protocols' check does not sit well with the concentration on two themes; and the need for a standards check restricts the possible selection of themes.

It is not unreasonable that all institutions demonstrate from time to time that they still satisfy the criteria that earned them their current status – this was the view taken by AUQA in checking universities against Protocol 1. Now it has been asked to check the universities and other SAls against the new Protocols, AUQA is working on making this low-key and unobtrusive for those institutions that are 'comfortably above this threshold' (section 1.3) and concentrating on areas where the audit will add value. AUQA is also working on how to combine a 'whole of Protocols' check with the thematic approach of investigating two areas in detail and in depth. It may be that experience after two years of Cycle 2 will lead to the conclusion that the thematic approach should be cut back to cover only international activities, to permit concentration on the Protocols and standards.

The audit reports in Cycle 2 will look different to those of Cycle 1. A longer Executive Summary will bring out more clearly the institution's performance in the themes, against the Protocols, and in addressing Cycle 1 recommendations. The focus on outcomes and standards means that AUQA is receiving and using more data (and has employed a Senior Institutional Research Analyst to deal with it and advise on its interpretation) and will be reporting more data in the audit reports.

Institutions will be audited in a slightly different order to Cycle 1. It is currently planned to carry out the audits in the five-year period 2008 to 2012.

#### *4.2.3 Auditing Accrediting Agencies*

Unlike audits of institutions, which are designed to support diversity (by auditing each institution against its own objectives), audits of the state, territory and federal accrediting functions are designed to support homogeneity and consistency (by auditing all against the same Protocols).

AUQA spread the agency audits through the first cycle, like the institution audits. This proved to be an unwise decision, as the agencies were at greatly different stages in implementing the new Protocols. In Cycle 2, AUQA will audit all the agencies in 2010. Consultation with the agencies on how to do this in a way that evaluates and improves national consistency is just beginning (July 2008).

#### *4.2.4 Further Ahead*

As the earlier world review implies, Australia will have a national QA body well into the future, with a continuing emphasis on outcomes (quality) and the level of those outcomes (standards). Therefore, even though AUQA's second audit cycle has only just begun, and might be revised mid-term, it is sensible to plan for the longer term and act now with the future in mind. If the current thematic approach continues for the whole of Cycle 2, Cycle 3 audits could be 'whole of institution' again, akin to Cycle 1. If the thematic approach is dropped mid-cycle, Cycle 3 might draw on the two-stage process that has been found to be very effective in California, where the quality agency works thro a discussion of institutional

capacity before moving onto educational effectiveness a few years later. This might allow AUQA to comment more authoritatively on the level of funding needed by universities to implement audit recommendations. Doubtless other possibilities will emerge from the very active world-wide attention to good practices in QA, and AUQA will continue to canvass any such ideas with its stakeholders.

AUQA could take on a wider QA role (see for example the proposals in the Labor White Paper of 2006). The review panel may recommend major structural or policy changes, but a revised HE system will still need a (revised) QA system. AUQA's approach is flexible and could continue to be adapted, as has occurred for the second cycle of audits and for the NSAI audits.

### **4.3 NSAIs**

As mentioned above (section 3.3.3), NSAIs that achieve HE provider (HEP) status must be audited. At present, AUQA has scheduled almost 50 of these for audit over the next five years. This is not a 'second cycle', but the planning for these audits, and their implementation, are occurring in the same time period as the Cycle 2 audits.

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## **5. Standards**

(Section 3.3 & Questions 12-14)

### **5.1 Standards in AUQA's Objectives**

Since AUQA was charged with auditing each institution against its own objectives, it was not established as a standards-setting body. The only reference to standards in AUQA's 2000 Constitution was in Objective 4: "report on the relative standards of the Australian higher education system and its QA processes, including their international standing, as a result of information obtained during the audit process" (AUQA Strategic Plan, 2001-2006) – an objective that worried institutions because it implied a comparison between institutions ('relative standards') despite the ostensible government commitment to diversity. In fact, the drafters of the objectives assumed that universities would present information on standards and standing to AUQA in the context of their audits, and hence AUQA would be able to collate and report this information.

AUQA produced a report in fulfilment of this objective (Stella, 2006), but had to report that universities were generally at a very early stage in the sort of inter-institutional comparison (benchmarking etc) needed to make authenticated statements on the standards they were achieving. It is this absence of the necessary conditions for assessing and reporting on relative standards that have prevented AUQA from making "significant progress in this area" (Australian Government, 2008, p37).

Reference to standards has been strengthened in AUQA's revised objectives, with Objective 1 requiring AUQA to "arrange and manage a system of periodic audits of the quality of the academic activities, including attainment of standards of performance and outcomes of Australian universities and other higher education institutions" (AUQA Strategic Plan, 2007-2012). AUQA is already beginning this work, through the Cycle 2

audits and more broadly, as indicated below. First, however, a comment on the attention to standards in the UK.

## **5.2 The UK Approach**

The discussion paper (Australian Government, 2008, p73) says that the UK is further advanced in assessing and reporting standards, but does not mention that AUQA was not charged with doing this, nor that a range of necessary structures and procedures are in place in the UK (see below). Even so, however, the QAA does not in fact report on standards achieved by institutions.

“QAA does not have standard learning outcomes for each course, but seeks broad comparability. There are no absolute standards, as this would be counter to diversity which is desired. ... The External Examiner System is not part of QAA’s Academic Infrastructure, but is part of the context for it. It is a central and essential part of the UK’s achievement of comparability and measurement of standards.” (P.Williams, Head of QAA, Personal Communication, February 2007). Also, “what the British quality assurance framework cannot do – and what we believe impossible – is provide meaningful comparative information about institutional teaching performance” (Alderman & Brown, 2007).

“Assessment is largely dependent upon professional judgement, and confidence in such judgement requires the establishment of appropriate forums for the development and sharing of standards within and between disciplinary and professional communities.” (The Weston Manor Group, 2008)

Suggestions are made below (section 5.3) on developments that could occur in Australia and which AUQA could lead so that Australia is better placed to make stronger statements on standards in this country (but see comments in section 5.4).

## **5.3 A Framework for Standards**

A check on standards can be carried out within the two agreed themes for each Cycle 2 AUQA audit, but an effective and comprehensive standards check needs a more comprehensive systemic structure. This has been recommended several times during this decade by different commentators (including in submissions to previous reviews). Australia already has one necessary component of such a structure, namely a qualifications framework (AQF) that covers higher education. Although there is some criticism of it, it is a descriptive or template framework, which is much more useful and more supportive of institutional diversity than the prescriptive or pigeon-hole frameworks in use in some other countries.

Comparison with the UK suggests that what Australia lacks to support the AQF in relation to standards checking is at least

- something like the UK QAA’s subject benchmark statements (which took some 10 years to establish, refine and gain acceptance),
- the equivalent of the QAA’s program specifications,
- systematic external moderation (James et al., 2002), and
- subject moderation panels (Anderson,2001).

AUQA has already begun working on standards as part of its preparation for Cycle 2, and is liaising with ACER, ATN and ALTC on this. A framework for standards in Cycle 2 was produced by an AUQA-convened high-level Reference Group, so the statement that “questions persist about which standards will be used for second cycle audits” (Discussion Document, p73) is incorrect. It is now up to the institutions, who are the custodians of standards, to populate this framework.

AUQA would be the natural body to work with the higher education sector on developing processes and systems such as those listed above (see for example Sadler, 1987, on descriptors and exemplars). ‘Standards’ were part of the theme selected by AUQA for this years’ Australian Universities Quality Forum (Canberra, 9-11 July) and a lot of potential lines of enquiry have emerged. AUQA is embarking on:

- work with the professional associations,
- further work with ACER,
- investigating what prior (and unused) work exists in Australia,
- drawing on the US experience with (and imminent ALTC report on) electronic portfolios, reviewing US major field tests,
- and so on.

**Recommendation 9. AUQA should be commissioned to carry out and/or co-ordinate the work necessary to define standards and enhance the attention given to them.**

An appropriate attention to standards can be an antidote to the fallacious attention now being paid to rankings. In commenting recently on some of the indicators used in ‘league tables’, Alderman (2008) said “The upholding of academic standards is thus replaced by a grotesque bidding game in which standards are inevitably sacrificed on the altar of public image”.

#### **5.4 The Meaning of ‘Standards’**

It would also be useful to have a broader national discussion on the meaning of standards. (The discussion paper itself uses different meanings.) Australia has not thought through the consequence of the massification of higher education over the last 20 years and the consequent need to broaden our understanding of standards, and its implications for our systems (such as the nature of academic support for students). Furthermore, the frequent references to measuring standards and “meeting a minimum set of internationally comparable standards” (Discussion Document, p73) fail to acknowledge the fact that few standards are immutable over place and time, but are much more context-dependent than politicians and others like to think. “There are important benefits of higher education which are not amenable either to the precise specification of standards or to objective assessment.” (The Weston Manor Group, 2008) There are naïve aspirations about collecting standards. While it is essential to make statements about educational performance, too detailed a structure for the external scrutiny of outcomes can easily tip over into interventional compliance, with consequences for institutional autonomy and ‘self-accrediting’ status.

Having said that, there are few credible and substantiated examples of failings in standards in Australia (except perhaps in transnational education, which is being particularly strongly

addressed by AUQA and by a special-purpose Federal Government grant which was and is provided because of the high risk and reputational factors for the sector).

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## **6. Ownership of AUQA**

### **6.1 Members**

Created by MCEETYA, but operating as a company, AUQA has 'Members' who act in a similar manner to share-holders. The Members are the nine ministers responsible for HE (ie a subgroup of MCEETYA).

Ownership by all the jurisdictions rather than by one jurisdiction is a good way of signalling AUQA's national character. Being a company rather than a statutory body or government department also signals a high level of independence, a characteristic expected of any national quality body. It is accepted world-wide that QA agencies must make independent decisions, based only the evidence related to the published criteria for the agency's decisions, and AUQA's structure facilitates this.

What is less satisfactory is that AUQA's interaction with its ministerial owners is through the Joint Committee on Higher Education (JCHE). This subcommittee of MCEETYA was set up, before AUQA existed, to advise MCEETYA on HE matters, and comprises a nominee from the relevant part of each of the nine departments responsible for education. Now MCEETYA owns a company in the HE area (namely AUQA) it should routinely seek input on HE from that company as well as from the departments of education – and AUQA's input should not be filtered through the departments. It is analogous (in the institutional sphere) to having AUQA dependent on the group of DVCs/PVCs(Academic) rather than being able to relate directly to chancellors and vice-chancellors. AUQA has sought to be more closely involved by receiving JCHE papers and being able to request to be present at JCHE meetings for nominated items, but JCHE refused this, and invites AUQA to be present only when it thinks fit.

**Recommendation 10. The relation between AUQA and the JCHE should be reviewed and strengthened to permit AUQA to provide input to MCEETYA on all relevant matters.**

To ensure that there is awareness and understanding of AUQA on the part of its ministerial owners, despite the tenuous or non-existent interaction through formal channels, the Chair of the AUQA Board and the Executive Director meet several of the ministers individually and in person each year.

### **6.2 Governance**

Once MCEETYA had agreed to establish AUQA as a company, discussions between the governments and the universities took place on the composition of the Board of Directors of the company. It was agreed that directors would be drawn from (but not represent) various constituencies, and be appointed by the Members, and there were extended negotiations on the balance of the various constituencies. The balance is: 4 nominated by the SAIs; 1 by

the NSAs; 3 by the Federal government; 3 by the States and Territories; and the Executive Director appointed by the Board. The six government nominations have not all been public servants, but include nominees from business.

The Board has worked very effectively and AUQA has proved to be a successful ministerial company. There is a match between form and function, and directors have almost always recognised their responsibility to AUQA for the good of the quality of Australian HE. It has shown itself capable of making dispassionate judgements in relation to any impact its work might have on major stakeholders. AUQA works independently of the bureaucracies, and its persistence in attempting to relate directly to individual ministers shows a recognition of their role, but without being inappropriately influenced by them.

There are, however, two problems with the way the Board is formed, and AUQA's own external review recommended on this matter (but JCHE judged it 'not a strong case').

Firstly, as the nominations come from various groups, there is no opportunity for anyone to consider the composition of the Board as a whole. AUQA's review commented that this could leave AUQA short of particular skills (such as legal or financial). This year, AUQA finds itself in the unfortunate situation that every nominating group has provided only male names. While the AUQA Board has sent a strongly-worded request about this to all groups, it is not in AUQA's power to avoid such situations happening again.

Secondly (which could be seen as a special case of the first), the AUQA Board elects its chair from among its members. The Constitution constrains which members may be elected, and in any case, the choice can only be from within this group of people who are all nominated by other bodies, so the Board itself has minimal choice of chair.

Both these problems could be addressed by permitting the Board itself to nominate directors for a small number of positions (still to be appointed by the Members).

**Recommendation 11. The composition of the AUQA Board should be revised to permit the Board itself to nominate a number of directors for appointment by the Members.**

A possible change is to reduce the nominees of the SAs to 3, of the Federal government to 2, and of the States and Territories to 2, leaving 3 to be nominated by the Board itself.

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