



Department of Education,
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Quality Assurance and Accreditation in Australian Higher Education: An assessment of Australian and international practice

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Acronyms

AAU	Academic Audit Unit
ANTA	Australian National Training Authority
ANU	Australian National University
AQF	Australian Qualifications Framework
ARF	Australian Recognition Framework
AVCC	Australian Vice-Chancellors' Committee
CAE	College of Advanced Education
CHEA	Council for Higher Education Accreditation
CHEQS	Council for Higher Education Quality and Standards
CCC	Course Consultative Committee
CEQ	Course Experience Questionnaire
CQAHE	Committee for Quality Assurance in Higher Education
CUAP	Committee on University Academic Programmes
CVCP	Committee of Vice-Chancellors and Principals
DfEE	Department for Education and Employment
DETYA	Department of Education, Training and Youth Affairs.
GATE	Global Alliances for Transnational Education
GDS	Graduate Destinations Survey
GRE	Graduate Record Examination
HEC	Higher Education Council
HEFC	Higher Education Funding Councils
HEQC	Higher Education Quality Council
HSC	Higher School Certificate
ISO	International Organisation for Standardisation
MCEETYA	Ministerial Committee on Education, Employment, Training and Youth Affairs
MAM	Modern Australian Model
NAHE	National Agency for Higher Education (Sweden)
NCIHE	National Committee of Inquiry into Higher Education (Dearing report)
NEQA	National Education Quality Authority
NOOSR	National Office for Overseas Skills Recognition

NQF	National Qualifications Framework
NZQA	New Zealand Qualifications Authority
NZVCC	New Zealand Vice-Chancellors' Committee
QAA	Quality Assurance Agency
QAANZ	Quality Assurance Authority of New Zealand
QVB	Quality Validation Bodies
RTOS	Registered Training Organisations
TAFE	Technical and Further Education
Tps	Training Packages
UC	University of Canberra
VET	Vocational Education and Training

Glossary

Accreditation—the process whereby an authority, recognised by institutions and government, determines that an institution offering courses in higher education may become self-accrediting, or offer its own higher education awards subject to periodic review. An accreditation agency certifies that the standards of a course are appropriate for the award to which it leads; and that the methods are appropriate for the purpose.

Audit—an independent check on an institution's quality assurance. The process assumes that institutions have appropriate quality assurance policies and procedures in place and that convincing evidence can be produced that these are working to good effect. The audit checks the extent to which this is the case, and that the methods used by institutions are sufficiently reliable and rigorous to assure stakeholders as to the future.

Benchmark (of academic standards)—a statement of the explicit system-wide academic standards which apply within a field or discipline. Benchmarks usually refer to critical points of achievement such as the pass- fail line or the pass-honours line; but may also refer to 'the typical student'. Benchmark statements include the techniques and skills which are associated with developing understanding in the discipline; and the level of intellectual demand and challenge which is appropriate.

Benchmarking (of practices in an institution)—the formal and structured process of searching for those practices which lead to excellent performance, the observation and exchange of information about those practices, the adaptation of those practices to meet the needs of one's own organisation, and their implementation. (Meade, 1998)

Quality Assurance—the means by which an institution is able to confirm that the standards (of teaching and learning in the case of this report), set by the institution itself or other awarding body, are being maintained and enhanced.

Qualifications Framework—a set of statements containing the main criteria for defining qualifications based on the general characteristics of education and training at each qualification level. These characteristics are expressed principally as learning outcomes and, for higher education, include the intellectual standards appropriate to those levels (diploma, pass degree, honours degree, masters degree etc) and the quantity of work necessary for an award at that level.

Standards—a statement, making explicit what is implicit in academic practice, of the generic intellectual qualities that may be expected of a graduate generally or within a particular field or discipline. It is assumed that standards can be represented on a scale, at least to the extent of distinguishing pass and fail and various classes of honours attainment. Standards may be expressed comparatively, that is norm-referenced; or in absolute terms, that is criterion-referenced.

Executive summary

Australian universities are all self-accrediting. In the absence of a system of external examiners or an independent quality assurance authority, how can anyone know how good the degrees are? Several other countries—New Zealand, Britain, the USA amongst others—have agencies of different kinds which examine the quality assurance processes of their universities and, in some cases, the quality of students' work. Professional bodies in such fields as medicine and engineering assess the curriculum and standards in their fields and accredit professional schools and faculties. In the face of increasing international competition, can Australia continue with its present system unchanged?

This paper discusses issues in accreditation and quality assurance and assessment and outlines the present situation in Australia. It describes the practices in Britain, New Zealand, the United States, Sweden and the Australian vocational education and training system (VET) and discusses the strengths and weaknesses of each.

It then proposes a Modern Australian Model which builds on the self-examination processes now common in Australian universities. It proposes a national agency which shall be minimally intrusive within universities but which is still able to proclaim to the world that Australian degrees are of a good standard, carefully scrutinised. The agency will also be able to represent Australia in discussions which are beginning to take place on international accreditation.

A model is needed which builds on current and recent practice, which embraces both quality assurance and accreditation. It must accommodate not just the existing self-accrediting universities, but institutions aspiring to university status, whether public or private. It must also be appropriate for non-university providers of courses, some of which award their own degrees, others of which prepare students for the awards of existing universities. It must be relevant to those providing in novel ways, such as corporate providers and 'virtual' (computer-based) providers.

Its purpose would be to ensure, for the institutions themselves, for the Australian Government and the general public, and for students, that degrees are all of a sound standard in which the Australian people may have confidence and pride. Its methods would include audits of institutions' quality practices and for this purpose an independent agency would be needed.

The central quality activity of the agency would be an audit of institutions based on a detailed self-assessment, including benchmarks of standards. The process assumes that institutions have appropriate quality assurance policies and procedures in place and that convincing evidence can be produced that these are working to good effect. Should the audit reveal serious areas of weakness, the institution would be given a reasonable period to address such matters.

Higher education institutions now make annual submissions to DETYA (Department of Education, Training and Youth Affairs) in the Profiles context on their Quality Assurance and Improvement Plans for the forthcoming triennium. These plans outline the institution's goals, strategies for achieving those goals and the indicators used to monitor progress in achieving those goals. These plans should be made available to the agency to assist in the audit process.

Reviews of faculties, schools or departments are now standard practice in nearly all universities. In line with trends in quality assurance these reviews should give particular weight to degree standards and graduate outcomes. The reports of these reviews and the follow up action taken on them within the university would be of major interest to the agency.

1 Introduction

1.1 The questions

Australian universities are all self-accrediting; they each devise their own courses and award their own degrees without requiring any other approval. How do we know what these degrees are worth? How do universities themselves know? Are there steps that universities should take beyond their present measures to convince themselves, employers and potential students of their standards? What system-level arrangements exist that enable standards of degrees to be ascertained, either comparatively or on some absolute scale? What measures should apply to non-university providers which teach higher education courses and award degrees? What do other countries do?

In response to these questions we need to define what we mean by ‘good’ and ‘standards’ in this context, and whether there are underlying dimensions of quality which sensibly can be assessed across fields and across institutions.

Australia, like Britain, cherishes the idea that all its degrees in all its higher education institutions are of a good international standard—the ‘gilt-edged degree’ as Martin Trow has termed it. Trow has a dissentient view, quoted by Tony Becher:

The concept of high and uniform academic standards is in British academic life something of a fetish or totem.... It seems simply to be assumed that academic work of more modest standard offered to a broader student population must threaten the existing centres of excellence, as if Princeton were threatened by the standards of the state colleges or community colleges of New Jersey.... In the United States there are no common academic standards maintained throughout the system.... Americans are comfortable with quite marked variations in the quality and difficulty and level of instruction in different parts of the same department (Brennan et al. 1997 p.167).

1.2 Background and context¹

The Australian higher education system comprises, for the most part, autonomous universities established under State, Territory, or Commonwealth Government legislation with the power to accredit their own courses. State/Territory Governments retain the power to accredit individual higher education courses developed and delivered by other providers. Accreditation arrangements and approaches, however, vary among the States/Territories.

Globalisation, the massive expansion of educational opportunity and educational developments are creating a changing environment for higher education systems across the world. This environment is, in turn, creating pressure for concerted action by institutions and government agencies within and across countries to improve the way they approach quality assurance. Some countries, notably the United Kingdom (UK) and New Zealand (NZ), have recently introduced new arrangements.

Fast-growing forms of higher education in Australia are through distance education, on-line delivery and delivery off-shore. Australia is well aware that it needs to have a leading-edge approach to quality assurance in these forms as well as in traditional on-campus education, for its higher education institutions to maintain and further develop a major education export industry, as well as to satisfy the participants and other interested parties at home. In addition, a number of countries in the region look to Australia not only as a source for higher education but also as a benchmark for their own higher education standards.

Electronic communication is enabling our competitors to provide education services in Australia and in our target markets overseas. The pressure to deliver mass higher education and opportunities for lifelong learning in a more dynamic environment, with a greater number of players in the market, is making quality assurance and enhancement in our publicly-funded institutions a more challenging endeavour than it used to be. Furthermore, increasing pressure on governments to ensure value for money, combined with public accountability, demand a more rigorous approach to quality assurance and accreditation. Finally, institutions themselves are aware of the pressing need to maintain high intellectual standards and to have processes for assuring the quality of their degrees.

¹ The first two paragraphs of this section are drawn with slight variations from DETYA (Higher Education Division) *The Quality of Australian Higher Education 1999* Canberra 1999

On the face of it one might expect degree standards to have fallen over the last two decades. During this period the resources for teaching have declined substantially, participation has increased to the point where now 45 per cent of the age cohort will participate in higher education, there are some pressures to have high pass rates and low dropout rates, the accreditation processes once used in half the sector have been abandoned, some former colleges have become universities without much serious tutelage from established universities, and students cannot expect to be known as individuals by staff members—rather, in a number of universities the experience for today's average student is a mass one with lectures of many hundreds and tutorials of 50 or 60. Add to all this the fact that a lot of undergraduate teaching, especially in the early years, is now the responsibility of temporary staff or postgraduate students whereas it was once regarded as the responsibility of the professor or other senior staff.

At the same time as the above changes, actual progression rates from enrolment to graduation appear to have improved. Perhaps in the last decade or so, with the advent of new strategies to raise the status and standard of teaching, institutions have become more efficient; or students come better prepared from school and more motivated; or it may be that courses are easier to pass. It would seem important that the institutions themselves have the means to understand what is happening in these new circumstances.

The question is also important for marketing. Up to this point Australian higher education has been able to attract overseas students because of its good track record, good advertising and word-of-mouth reports from graduates. In contrast to the USA the fact that all but a couple of small Australian institutions are public and therefore 'guaranteed by the government' has carried some sway in parts of Asia.

Nowadays clients and overseas governments are becoming more discerning and discriminating. Indeed the very competition that has been fostered between Australian institutions is now starting to show a down side—if some promote themselves as the best, others are by definition not so good. 'Why' asked a perceptive Indonesian bureaucrat who had studied in Australia 'do you Australian universities compete so hard against one another, when the reality is that Australia as a whole compares well with most other countries?'

In an internationally competitive market we are in danger of undermining one another. Unlike some other countries, we lack an authoritative, independent, highly regarded agency which can confirm the standard of degrees in each institution.

2 Determining quality

2.1 Standards

'Quality' and 'quality assurance' are recent imports into the university vocabulary from industry. Academics are much more used to talking about 'standards'. It is commonly implied in discussions about the quality of different institutions and their degrees that there is an attribute called 'standards' which is uni-dimensional, and capable of being measured for an entire institution, or for particular courses, such that they can be placed in broad categories on a scale from good through to poor. It is not only outsiders such as employers or prospective students who accept this uncomplicated view of standards, but also academics themselves. If a simple test were conducted among a group of professors it is likely that there would be reasonably high consistency about which institutions or courses were of good, medium and poor standard.

It makes sense to talk about standards, and about objective ways that institutions may assure themselves and outsiders about the quality of their degrees. However, while there may be reliable observations about degree standards, it is by no means certain just what it is that is being appraised when we agree that one course is good and another in the same subject area is poor.

According to institutions' statements of mission and objectives we would expect their examinations to assess the attainment of a very complex set of intellectual qualities. Most academics would claim that, when they test students' learning, in addition to ability to recall relevant facts they also test ability to analyse, criticise, synthesise, make judgements based on evidence and so on. There is now quite a body of research evidence on student learning and on assessment. From this the experts conclude that typical examinations generally do not assess well what is called 'deep learning' and the higher intellectual abilities. The ability to recall facts is the characteristic which, more than anything else, determines what results a student gets.

2.2 Inputs, processes and outcomes

There is also the question of just what it is that gets looked at when standards are being assessed. The terms ‘inputs’ and ‘outcomes’ are frequently used in discussion, and there seems to be a growing move towards assessing outcomes rather than inputs, which understandably are seen as less valid sources of indicators of standards. Professional associations loom large in the operations of many professional faculties, and in accrediting for the purposes of registration, most appear to focus more on inputs—curriculum content, student staff ratios, contact hours, resources and equipment and so on—than outcomes.

In between inputs and outcomes there are processes, those activities used to turn the raw recruits into high quality graduates. Chief among these are the arrangements for teaching, learning and assessing student progress. The Committee for Quality Assurance in Higher Education (CQAHE), initiated by the government for three years in Australia, chose teaching and learning as the main focus for one of its annual exercises and used a number of reasonably objective performance indicators for the purpose. None of these, however, were direct indicators of degree standards and it would be quite possible for an institution which had scored well on indirect indicators, for example those used by the CQAHE, to graduate students with minimal intellectual skills and a skimpy knowledge of any field of study.

A senior academic familiar with quality assurance in Australia and overseas told us of his concern that some institutions were focusing too much on process and not enough on academic standards and outcomes in their quality assurance plans.

2.3 What gets measured?

As well as distinguishing input, process and outcome it is useful to distinguish approaches to assessing standards according to whether the indicators used are direct or indirect. For example income received from donations is an indirect input measure, but a scrutiny of curriculum content is a direct one. If certain elements are missing, for example mathematics in an engineering course, then the standard of graduates cannot possibly be adequate. At the output end reports of employment rates are an indirect indication; the scrutiny of examination questions and answers a direct one.

Some people are sceptical that useful comparisons of standards could be made between institutions, even within similar fields, because of the diversity of objectives and curriculum. Others believe that there is sufficient overlap in

curriculum so that in certain disciplines there could be agreement on some common questions. For example several geography departments in UK universities have plans for a shared bank of computer-assessable questions covering the core of the undergraduate curriculum. There may be similar schemes in Australia but we do not know of any.

Apart from the variations of content between different courses and the many dimensions that are involved when we set out to measure students' intellectual attainments, there are other problems that should make us wary before attempting to assess standards across institutions and fields.

One of these is whether the value-added issue should be taken into account. How are we to compare the standards of two institutions, both preparing students for the same fields, one of which recruits its students from the top of the Higher School Certificate (HSC) performers, the other from the bottom?

Another issue to bear in mind when attempting to assess and make direct comparisons of standards is whether the comparison is relative or absolute. In the case of relative or normative comparisons the reference is to performance elsewhere, perhaps to a benchmark. Within a class a student's mark denotes a position in relation to others who have attempted the same task.

Within an institution there is sometimes normative pressure on departments to keep the proportions of students who fail, pass and get distinctions within certain ranges. This contributes to uniformity of standards across fields, assuming that there is comparability in the standards of the intake and in the quality of the teaching. If these assumptions are not valid then the pressures to conform may well distort standards in atypical departments; for example an institution may have a culture of mediocrity. What used to be known as 'the new professor phenomenon' sees attempts to apply the higher standards that pertained in the professor's previous institution met by pressure from committees, colleagues and students demanding that 'when in Rome, do as the Romans do'.

Comparisons are generally made using a summary statistic representing the performance of groups of students who have attempted the same or similar tasks. The summary statistic may be an arithmetic average, or the pass-fail proportions, or, where the concern is with standards at the top of the range, the percentage of distinctions awarded. In conducting such an exercise reliably, for example by using common examiners, there is always an implicit assumption that some absolute standard exists.

An example of an examination question which can be assessed on an absolute level of achievement is given by Allen Miller (1998):

A continuing education course on criminal law has, as one of its objectives, 'that students be able to explain who is subject to the law'. To meet the pass criteria, the students are required to list without error those who are subject to the law, special circumstances governing any particular groups, and the appropriate references from the criminal act. (p 25)

Needless to say, it is only rarely that standards can be expressed on an absolute scale. Another example may be examinations for professional entry where the objectives are expressed entirely in the form of carefully defined competencies, as in nursing.

2.4 Standards and the aims of university education

All institutions have to decide whether or not they will graduate a student who has reached the end of a course. There might be some candidates who are required to repeat units, and some who are recognised as honours graduates but the final, basic decision is 'yes' or 'no', 'graduate' or 'fail'. In a quality exercise it is therefore not unreasonable to ask an institution what are the criteria it uses and what are the measures it applies in reaching these decisions about graduating or not graduating a student to whom it has extended the privilege of higher education.

Whether a student is prepared for entry to a profession or is being educated in traditional generalist science or humanities disciplines, the criteria are likely to be, at the very broadest level, derived from the aims of:

- developing intellectual skills and values
- teaching the mastery of a field of knowledge, and
- ensuring certain relevant experiences.

This is not the place to debate or enlarge on these criteria. It is worth observing, however, that it is students' performance on the first two which is generally subject to examination. Furthermore, while academic rhetoric is likely to emphasise the first, when it comes to assessment it is the second—the body of information that has to be covered—which is likely to carry the more weight. This does not have to be the case, and it may not be intended, but research shows that examiners generally find it more difficult to test the acquisition of intellectual skills and values than to test memory of facts. The point is relevant to the objectives of this project and we will return to it later in the report.

It is also important to observe that once upon a time the third criterion of relevant experiences referred to the informal educational community composed of junior (student) and senior (staff) members involved in intellectual exchange over both a prescribed and a broad curriculum; the latter, comprising debate on philosophical, cultural and political questions, sustained a rich environment of union, clubs, societies and campus meetings. These days such notions of the higher education experience tend to be regarded as an optional extra; and 'relevant experience' is limited to practical work or so many hours of supervised work experience in the profession the student aims to enter. The internet degree, because of its nature, has little to do with either of these sorts of experience.

We return then to our central concern of what can be done to meet the established need for an independent means of assuring degree standards across the system, using direct measures of standards which have greater validity than indirect.

The first step is to ask institutions what qualities they aim to have their graduates acquire as a result of their educational experience. A number of Australian universities now publish a statement of such qualities.

The second requirement is to ask institutions about the criteria and the evidence that are used which enable them to deem that a student is worthy of graduation. They probably have such statements, but they are not readily available outside the faculties and departments concerned. We know that many measures are used—tests, accumulation of grades, attendance records, holistic assessments, essays and reports on practical assignments, group projects and work experience.

Of all of these measures, satisfactory performance in final year examinations is likely to be a necessary condition for graduating. Although this is nowadays rarely a sufficient means for deciding, such examinations provide one means for assessing standards within disciplines and professional fields; and perhaps between them. Sampling scripts at the pass-fail or pass-honours lines can give a department an idea of any changes in its standards over time. In disciplines and fields where there are common elements in the curriculum in different institutions, such sampling could give an idea of standards across the system.

If it is assumed that there are intellectual skills which transcend fields and disciplines, and that these can be assessed, then the idea of monitoring standards generally can be addressed. In this context it should be noted that universities have for long been practising the assessment of general intellectual skills when they deem students to be suitable for university study according to aggregate marks from the HSC Examinations; or when they award post-graduate scholarships, or as in USA, they use a Graduate Record Examination (GRE) for admission to graduate school. The closest example

we can think of is the scheme of discipline reviews made by expert panels for the Australian Vice-Chancellors' Committee (AVCC) in the 1980s which, among other evidence, looked at honours theses from departments across the country.

The third requirement for assuring degree standards with valid (direct) measures is to evaluate a representative selection of the outcomes. Later in this report we will elaborate on a method for independent assessment of samples of examination scripts which could be more generally used by institutions in regular reviews of their departments and programmes. (Chapter 7 and Appendix A) We will also propose that the method be used as one means for reporting on the health and standards of disciplines across the system. The standards used in the evaluation will vary according to the purposes of a particular course; but there will also be general standards, one of which will be related to ideas of minimum competence to be a graduate. Unlike the professions however, which are generally concerned only with minimum competence necessary for practice, the evaluation will also focus on higher and honours levels of attainment.

This approach to assuring the quality of degrees can be implemented with complete confidentiality to the students, examiners and institutions concerned. Furthermore it need no more violate institutional independence and academic freedom than the CQAHE exercise of 1993–95.

The brief for this project asserts that:

Australia needs a rigorous quality assurance and accreditation system for a number of reasons:

- to protect our international reputation in respect of both the quality of our educational processes and our standards;
- for public accountability purposes, particularly to satisfy the taxpayer that it is getting value for money and that government subsidies are supporting education activities of an appropriate standard;
- to inform student choice, especially in light of diversity of offerings and variations in price; and
- to promote and improve quality processes and outcomes at individual institutions as well as disseminate good practice, leading to overall system improvement.

The brief then describes five possible models which might meet the Government objectives in this area. In evaluating these models in later chapters we will be asking whether an approach to quality which focuses directly on standards is practicable and acceptable, or whether an audit of institutions' own quality processes is sufficient to meet the needs. First however we will look at some conclusions from previous studies.

3 Previous studies

There is a plethora of studies on the quality of Australian universities, to say nothing of the overseas studies on quality assurance, performance indicators and so on. A seminal work, constantly quoted in the literature, is Paul Bourke's *Quality Measures in Universities* (Commonwealth Tertiary Education Commission 1986). Its advocacy of clear statements of goals, performance indicators, regular evaluation of achievement and review of achievements and procedures has seen these become standard practice in many, perhaps most Australian universities. They indicate a striving for good quality; they are not in themselves a guarantee of quality.

In 1997 John Drinan of the University of Newcastle produced a report *Quality Evaluation of Teaching and Learning in Higher Education in the Netherlands, Denmark, United Kingdom, Australia, Sweden and New Zealand*. This is a most useful comparative study, and contains a summary of characteristics which might define an ideal system:

- it would acknowledge and endorse that quality, in this context, has multiple meanings: fitness for purpose, striving for some notion of perfection, value for money and continuous improvement;
- it would be jointly sponsored and implemented by government and the national association of higher education institutions;
- it would foster diversity in all possible ways;
- it would be principally oriented to disciplines and specific aspects of institutions, and not institutionally global;
- it would serve the dual purposes of accountability and improvement;
- no rewards or penalties would be applied, except for institutions which fail to remedy problems;
- it would focus on outcomes rather than procedures;
- well-designed quantitative and qualitative performance indicators would be used;
- self-evaluation would continue to be incorporated, and encouraged for routine use by the institutions;
- external evaluation would be continued, with the inclusion of specialist educational developers in the team, with the duration of institutional visits proportional to their size and complexity;
- reports would be given to the institution and sponsors in advance of publication, and the publication would incorporate the institution's response;

- it would be comparative in terms of aspects of performance, but not in any sense which would lead to rankings because of the major impediments to their validity;
- rigorous and vigorous follow-up would occur to ensure that institutions address the issues and are encouraged to embed the practices of continuous improvement in their routine activities; and
- implementing agencies would support the endeavour by illuminating good practice and brokering benchmarking and networking among appropriate institutions.

In 1992 the Higher Education Council published a set of papers by the National Union of Students, the academic staff associations, the Council of Australian Postgraduate Associations and AVCC, together with a discussion paper of its own, under the title *The Quality of Higher Education*. The papers raise a number of related issues: fitness for purpose; the definition of 'quality'; the need for continual improvement; quality assurance; competencies and quality; outcomes; resources; stakeholders. All the papers are contributions to discussion, not attempts at definitive answers. It is fair to say that all these points have been taken into account in the subsequent consideration of quality in higher education, and in particular in the Higher Education Council's (HEC) next publication *Achieving Quality* at the end of 1992.

This report canvasses at length the issues summarised in the preceding paragraph, and recommends some kind of 'national structure or mechanism for quality assurance'. It floated this idea in consultations with universities and other interested parties, and 'the undoubted consensus before the consultations, and the almost unanimous view after, was supportive of some kind of national structure' (p.77). The structure preferred was 'a minimally intrusive body with audit-type functions and particular responsibilities related to funding and provision of advice to the system' (p.78).

Presumably as a result of this report and its recommendations the Government established the Committee for Quality Assurance in Higher Education (CQAHE) under the chairmanship of Professor Brian Wilson, at the time Vice-Chancellor of the University of Queensland and a former chairman of the AVCC (see Section 7 below). This committee operated for the three years 1993–5, each year receiving a submission from each university and visiting each one for discussions.

Following a change of government in 1996 the new Minister asked the Higher Education Council (HEC) to implement the Government's approach to quality assurance and improvement in higher education by developing a structure which includes:

- the integration of quality improvement into the educational profiles process;
- reviews of quality improvement in institutions every three to four years;
- reviews of such higher education aspects as are of interest to the Government and the sector, which may emerge from time to time;
- general guidance and assistance to higher education institutions on quality improvement matters; and
- public reporting of progress made in quality improvement in the sector.

The Council produced its report *Quality Implementation and Reporting in Australian Higher Education 1997* in January 1998. This recommended 'that there be three-yearly reviews of institutional quality and that they take the form of desk audits of material provided by institutions for the Profiles discussions and additional material as required'.

It also recommended: liaison between the Council, the AVCC and the Department to develop performance indicators; thematic reviews from time to time; annual reporting by the Council to the Minister on aspects of quality; and appointment of a committee of the Council to oversee the Council's work in relation to quality.

After a change of Minister, the Council has been disbanded and these recommendations have lapsed.

At present quality assurance is the responsibility of each institution, although all institutions are required to submit annual reports on quality improvement goals and strategies to the Department and these are discussed during the Profiles visits. The Department of Education, Training and Youth Affairs (DETYA) has recently published a report on the current quality of the system (*The Quality of Australian Higher Education 1999*), the first of what it intends to be an annual series. This 'contains an overview of quality across the sector and publishes quality assurance and improvement plans of 39 higher education institutions' (p.iv).

4 Recent and current quality assurance arrangements in Australia

4.1 Introduction

The current quality assurance and enhancement processes for Australian higher education, which have evolved over a period of years, have been successful in building new structures within institutions and in promoting a change of culture.

Institutions currently report to the wider community through quality assurance and improvement plans that set out their goals, the strategies adopted, and the indicators they use to assess their success in achieving those goals.

Nearly all institutions have in place a system of formal, cyclical review involving external assessors for the development/evaluation of programmes and organisational units. Other monitoring processes involve gathering external feedback through periodic surveys. For some institutions, participation in Australian and/or international higher education networks and the benchmarking projects undertaken by these networks are a significant part of their quality management process.

There are a number of other dimensions to the quality assurance framework, in particular:

- the role of professional bodies and associations in accrediting professional courses such as medicine, law, accounting, engineering, nursing and architecture;
- the use of external examiners for higher degrees by research and some honours degrees;
- the encouragement of innovation and good teaching through the Committee for University Teaching and Staff Development and specific initiatives funded under the Higher Education Innovation Programme, including the development of an instrument to test graduate generic skills; and
- the publication by DETYA of *Characteristics and Performance of Higher Education Institutions*, a report which provides indicators covering source of funds, distribution of expenses, research funding, equity, gender and age distribution of students, basis of admission, overseas students, mode of study, course breadth and staffing as well as graduate satisfaction with their courses and their employment experience.

There are less formal aspects of academics' work in Australia which tend to support and enhance the quality of degrees. One is the undergraduate experience of the academics themselves, and their experiences in their own postgraduate studies. Australian institutions recruit academics from a relatively small range comprising those whose first and higher degrees are from a few major Australian universities and a comparative handful of internationally respected British and American universities (Anderson et al, 1997). Inevitably these experiences tend to set the standards and expectations of the academics in Australia. While this is imprecise, almost osmotic, nevertheless the standards of Oxford and Cambridge, Harvard, Princeton and the like are well known and emulated in Australian courses, though often at some remove.

In the same way, very many academics in Australia have worked for a time—either on the staff or in outside studies programmes—in major international universities. Again, it is inevitable that they will have absorbed certain values, seen practices to emulate or perhaps to avoid, and thus enriched their work in Australia. An obvious example is the change over the last few decades from three-term year-long courses of study in every university to the now-universal semesters. There is also a steady stream of overseas academics passing through Australian institutions, either as very short-term visitors or for stays of several months; these people bring ideas, practices and values with them and have some influence on the departments which they visit.

There are clear weaknesses in the current approach. One of the weaknesses is that the rigour with which an institution approaches its quality assurance across all aspects of provision is entirely at its discretion. Another weakness is that, with some exceptions related to State Government audit requirements, there is no external review or audit of its claims. Further, there is no way of knowing whether a given degree in a given institution is of acceptable standard or how it compares with similar degrees elsewhere at other institutions. Additionally, our claims in the international marketing arena lack a degree of credibility as a result of our current hands-off approach. Finally, there is no way of knowing how Australian degrees compare with similar degrees in competitor countries, e.g. Britain, Canada, the United States and New Zealand.

Furthermore, it must be recognised that the current environment places heavy pressures on the maintenance of standards. The Government has made it clear that public funds are limited and has urged institutions to broaden their funding base. Staff/student ratios have declined and resources for libraries and research infrastructure are increasingly stretched. The trend towards mass higher education brings into institutions a more diverse student body with far less shared intellectual background and experience of the preferred study skills; this makes the task of the academic teacher more demanding and can lead to a diminution of standards. A whole array of new fields of study has

come into higher education—studies without the long-established tradition of standards and scholarship and the large body of scholars found in such well-known fields as mathematics, law, chemistry. The heavy reliance of Australian institutions on the fees paid by overseas students is said in some cases to lead to pressures for excessive leniency in marking their exams and to dilution of standards of courses.

In the face of all these considerations, there would be advantage in some independent method of firm assurance of sound quality for Australian degrees and graduates. The present practice of publishing the quality plans of every university is an advance on anything that has gone before, but it is not enough by itself.

4.2 System level

CQAHE

In 1993 the Government established the Committee for Quality Assurance in Higher Education (CQAHE) under the chairmanship of Professor Brian Wilson, Vice-Chancellor of the University of Queensland and a former chairman of the AVCC. This committee operated for the three years 1993–5, each year receiving a submission from each university and visiting each one for discussions. While the committee, in evaluating performance in each university, was required to look at outcomes, it was unable to find much in the way of valid measures, and as a result, the main thrust throughout the three years was to concentrate on processes for ensuring quality in teaching, research and community service. Every university received some funds from the committee, but those judged to have the best processes and outcomes received most.

At the end of three years and three rounds of submissions and visits the CQAHE was disbanded—not because of any failure in its work, but because it had done much of the work of encouraging quality assurance measures in universities, and because its visits and the submissions required a great deal of time and effort within the universities.

There was not agreement among our respondents about the usefulness of the Wilson quality exercise, some saying that, with the methods used, it failed to make assessments that were either reliable or valid. Many, while not disputing this, claimed that the exercise had a positive effect. None however claimed that its assessments of the quality of teaching and learning were any more than second or third order approximations to the central quality question—the academic standards of degree courses. Generally our

respondents did not see any connection between the quality arrangements that have been put in place since Wilson and the questions we asked about degree standards.

AVCC

Ten years or more ago the AVCC initiated a series of reviews which focussed on the honours level in undergraduate courses in particular disciplines and professional fields. The areas reviewed included history, economics, psychology, and physics. Reports of these reviews have been published. The focus was on the honours level of undergraduate courses, the argument for this being that, whereas it would be impracticable to cover all years of all courses, the honours year was of importance as the source of future academic staff and that it set a standard which influenced undergraduate teaching

The reviews were conducted by panels from outside the particular university concerned and comprised mainly disciplinary peers. The review proceeded with visits to the department, interviews with key academic staff and students, and examination of curriculum and samples of examinations and theses. A report was prepared, discussed with the department concerned, and after modifications, published.

Although there has been no formal evaluation of the scheme, reports from some who were involved indicate that it was very successful in giving the departments concerned a clear idea of their standards, strengths and weaknesses. As the exercise became more well known and significant there was a tendency for interested parties to attempt to gain control of the process and the initial reputation which the scheme had for independence and objectivity was lost.

Nevertheless the idea of an independent review agency sponsored by the higher education collectivity received a lot of support from those we interviewed. An article by the former executive director of the AVCC, Frank Hambly, who was responsible for the above scheme (*The Australian* 3 February 1999 p.45), concludes:

It would be a small step to introduce a more formal system of external course accreditation to guarantee quality and standards that would not unduly impinge on the individuality of curricula or on autonomy... Any such arrangement would need to be controlled by the universities and relevant professional bodies where they exist and be centred on external peer assessment. It would surely satisfy students, employers and the community.

There are, however, two significant obstacles to the introduction of national accreditation. They are the experience of the former

Colleges of Advanced Education (CAE) that confirms the disproportionate cost and effort which such a system requires; and the competitive situation in which universities are placed, which makes their courses and course design commercially sensitive.

Unless universities are resourced to cover the costs of accreditation processes and freed from the constraints of the competitive market place, there is little chance of introducing an acceptable accreditation process covering all courses.

Discipline reviews

During the 1980s the predecessor agencies to DETYA initiated a series of one-off reviews of major fields in Australian universities. Reports were published on Engineering, Science and Mathematics Teaching, Accountancy, Law, Computing and Agricultural Science. A review of medical education was commissioned by the Commonwealth Department of Health.

The impact of most of these reviews was the subject of evaluations several years later. In general the evaluations found considerable evidence for change and implementation of recommendations, but also significant instances where practices that had been criticised remained unaltered. In many instances the excuse of inadequate resources was given as a reason for failure to implement recommended changes.

The West Review of Higher Education Financing and Policy

Although quality was considered in the 1997 Review of Higher Education Financing and Policy, the primary emphasis of the report was on financing and there was no consideration of the question of how degree standards in Australian higher education could be assured.

Professional registration

In courses leading to professional qualifications, for instance in medicine, law, accountancy or engineering, the profession itself can have considerable influence on the content and calibre of courses. This influence is exercised through the process of registration to practise: if a person has not been through a course approved by the professional body, that person may be refused the right to practise, since some registering bodies are empowered by civil law to grant or withhold that right. Technically speaking, these bodies are not infringing the university's autonomy to teach as the university thinks best; they are saying to the university: 'Unless you teach such-and-such, in this way, we will not accept your graduates to practise'. The university could continue as before, but it would lose students and public esteem.

This is no idle threat. Within the last decade or so at least two different professional faculties in two major Australian universities have been threatened with deregistration, one because of curriculum issues, another because its equipment was regarded as out of date. In each case the university changed its ways. There may well be other instances not known to the current consultants.

In strict logic such registration by the appropriate professional body need not be a guarantee of good standards of education; a lax professional body could accept the graduates of a poor course. In practice most professional bodies are part of an international network at least throughout the English-speaking nations; Australian qualifications are generally accepted in the rest of the Commonwealth of Nations and, with minimal supplementation, in the United States; and this gives our professional bodies, through work overseas and through conferences, exposure to international standards.

It is true that the accreditation of university faculties by professional bodies is primarily based on inputs: syllabus, equipment, numbers and qualifications of staff, and so on. The professional bodies do not usually take part in the assessment of students up to and including the point of graduation. Nevertheless it would be wrong to suggest that the bodies have no idea of the calibre of graduates. The graduates enter the profession to practise alongside experienced professionals of high calibre, and one presumes that it would fairly soon become obvious if the graduates of a particular faculty were notably weaker than those from other institutions.

An important characteristic of most reviews by professional agencies is the focus on a floor level standard, the criterion being 'minimum competence of the graduates to practise'. This contrasts with the AVCC scheme referred to above where the focus was on the top level of attainment represented by honours courses.

It might be argued that the professional bodies themselves tend to be dominated by the academic members of the profession. These academics are frequently office-bearers in professional associations, and—being not in the competitive environment of professional practice—more likely to be acceptable to a wide range of their peers. To the extent that this is true, does it affect their judgements of the quality of courses offered in the institutions? Anyone who knows academics knows that their judgements of courses offered by institutions other than their own are not likely to be overly soft.

Some professions require a period of supervised practice before the graduate is registered for independent practice: medical graduates, for instance, are required to complete a lengthy and rigorous internship before being granted a 'provider number' by the Commonwealth, which recognises them as

providing medical services eligible for fee support by Medicare—a *de facto* form of registration. The nursing profession has recognised the difficulties in transition from university to initial employment in hospitals, and some nurses are discussing the issue of internship. Pharmacists are required to work under supervision for a period before being licensed to practise independently. Something similar may apply in a number of professions.

Detailed reports of accreditation procedures in the fields of medicine, law, engineering and accountancy are provided in Appendix 2.

Of some concern are the many new vocational courses which prepare students for occupations which have developed quite recently, for example in the hospitality, recreation, entertainment, health and management industries. Strong professional associations with a clear tradition for standards and assessment have yet to develop in many of these, nor are there the international networks which serve to maintain standards in the humanities and science.

There still remains the question of the non-professional degree. How do we know that the B.A. or B.Sc. has the attributes that the degrees claim to develop?

Non-professional education

Most students in higher education expect to get satisfying employment after graduation, but a high proportion of them are not enrolled in professional courses. Humanities and social sciences, natural sciences and the broad area of economics, commerce and business are the three areas of largest enrolment in our universities. The graduates go into a very wide range of employments in offices, laboratories and classrooms as teachers, administrators, scientific workers, sales people, writers of various kinds and entrepreneurs using the intellectual skills developed through their education but not focussed on a single profession. How can we know that their education has been of good quality? There are international networks and some discipline associations, e.g. chemistry, taking an interest in higher education courses to the extent of reviewing curriculum and resources and, if satisfied, granting approval. Receiving the imprimatur of the association is taken as a serious matter in some institutions; more so we suspect in newer institutions than in the old established ones.

In general however the answer to the question is that in many courses neither the institution itself nor the outsider can be sure that graduates are of good quality. This is not to say that they are not; we simply have no sure means of knowing.

4.3 Institutional level

In recent years Australian institutions have made strenuous efforts to institutionalise mechanisms for quality control and improvement and to make more demanding the processes for approval of new courses. Those institutions which before 1987 were in the Advanced Education sector were required, during that period, to present their courses to external bodies for formal registration and accreditation, and the processes were prescribed to them by State accrediting and coordinating agencies. The emphasis which the Committee for Quality Assurance in Higher Education in 1993–5 placed on quality control and improvement led all institutions to review and amend their processes.

The processes used by the University of Canberra (UC) and The Australian National University (ANU) are probably representative of those used by other universities around the country. In the UC all new courses have had to be accredited by a Course Consultative Committee (CCC). These committees are nominated by the Dean and approved by a Pro Vice-Chancellor and report to the academic board. Membership typically will include outside experts, an employer and a student. CCCs operate not unlike professional accreditation committees. They evaluate curriculum content and design, the resources that will be required, and likely demand. The work of the CCC ceases once the course has been accredited. There are five-yearly reviews but these are regarded as a separate exercise.

For approval of courses, the processes used by the UC are: a new course proposal goes from the proponents to the Faculty Board of Studies; from there to the Vice-Chancellor's Advisory Committee (VCAC); and, if recommended, is approved by the Vice-Chancellor. It may be referred back to the previous body either by the Faculty Board or the VCAC, for further consideration and amendment. An interesting feature is that decisions are published to all Faculties, to the Students' Association and to the UC Postgraduate Association as well as to the Academic Board, and any member of the University may within a month ask to be included in the consultation process for the change.

At ANU, courses are usually developed without external participation—with some exceptions. This reflects the fact that most ANU courses do not lead directly into a profession. Those that do—in Law, Accountancy/Commerce/Economics, Forestry and Engineering—do have external contributors to their course development. Any new course proposal is developed within a department and considered by the departmental committee, which includes student representation.

For course approvals, the processes used are: the proposal goes from the proponents to the relevant Faculty; from there to the Board of the Faculties; from there to the University Council. It may be referred back at any of those stages for further consideration or amendment. The agenda and minutes of Faculty, Board and Council meetings (apart from a small confidential agenda) are publicly available, though not widely distributed beyond the members of those bodies. The resources that might be required are a matter for discussion between the relevant dean and the proponent department.

These broad processes of development—with or without external participation, and with some consultation of interested parties—and of approval, from proponents to some cognate body such as a Faculty, and then ultimate approval by a major committee or board—are probably followed by every university in the land. That old American definition of a good education—‘Mark Hopkins on one end of a log and me on the other’—is a fine tribute to the importance of personal interaction and the meeting of minds, but it is insufficient to win course approval in an Australian university today.

Course approval processes operate at the ‘front end’ of the quality assurance continuum. Measures also need to be taken to ensure the quality of delivery and ultimately the quality of degree standards themselves.

In the case of delivery, evaluation through student feedback—whether systematically surveyed or less formally obtained—is the principal measure used, with peer observation and assessment being much less common. While the Course Experience Questionnaire (CEQ) is usually cited as a quality assurance instrument in this connection, its limitations need to be recognised: its focus is the course, not the subject; it deals in overall impressions, not particulars; and it provides a delayed rather than a current perspective on the student’s experience of teaching and learning.

When it comes to degree standards themselves, quality assurance measures are neither well developed nor widely practised at this stage. In view of the emphasis given, in the rationale for this study, on ensuring the standard of Australian degrees, it is worth looking at ‘back end’ practices in more detail.

In our visits to universities, it was rare to find evidence of university-wide measures designed to ensure that the degrees as awarded are of good standard. This is a different and a narrower and more technical question from exploring graduate outcomes in the wider and longer term senses of employment and further study, career development or role as a citizen, and it needs to be tackled in a different way. It requires verification that knowledge has been mastered and academic skills and attributes have been attained at a level commensurate with the characteristics of a degree as set out in the Australian Qualifications Framework (AQF), or more locally and

specifically in a statement of the attributes expected of a graduate of this institution or faculty or course. At this stage, in our experience, it is more common to find the attributes expressed in terms of course objectives, if at all, than at the more generic levels.

While Academic Boards and Senates everywhere have responsibilities in relation to the quality of degree programmes, and while many set guidelines relating to examinations and assessment, typically the guidelines are not set at the level of detail necessary to put pressure on the standards of particular programmes. It is left to such bodies as faculties to pursue the detailed monitoring and comparison of standards within and across programmes, and they do this in varying ways. Each faculty is likely to have a committee which, among other things, reviews the profile of results obtained by individual students and by whole cohorts of students. In faculties with a common core curriculum across different majors, the committee can more readily check that the standards of assessment are being maintained across different markers or marking groups. Some faculties arrange for the double marking of the papers of students who are on the borderline of failure.

It could be argued that Academic Boards have a particular role to play in ensuring that the standards of degrees associated with off-shore programmes are consistent with those awarded at home. We were advised that actions taken to this end include common examinations, central marking and a continuing presence of staff from the home university at the off-shore campus.

The kind of internal moderation processes we have encountered and described rely basically on the existence of implicit standards which are formed from one's own academic experience, links with employers and the professions and comparisons across the subjects and disciplines that make up a degree programme. This is the connoisseur model of quality assurance and it works, up to a point; but it was suggested to us that attempts to assure degree standards through internal moderation are beginning to fragment under the pressures of devolution and the dilution of resources. For example, whereas it was once routine to separate the functions of examination and assessment, this is no longer always the case.

The use of external validation is typically viewed as the best means of adding rigour and credibility to the claims that an institution or faculty makes about the standards of its degrees. In some faculties the processes of professional accreditation and periodic review include the scrutiny of examinations and scripts by members of accreditation and review panels, but this is not common across all fields nor frequent within any one, given that accreditation and review cycles typically are for five to seven years, and are often arranged to coincide.

Apart from the contribution that external supervisors of work experience or practicum components of a programme make to assessment, it is rare—indeed almost unknown in our experience—for external examiners to be used in connection with ordinary undergraduate programmes in Australian universities. The one instance we came across, where two comparable and well-established universities in neighbouring states exchanged samples of scripts at threshold levels, was discontinued when it became clear that the implicit standards of markers in the two universities differed.

At honours degree level, we encountered instances where faculties included a paid external examiner in the panel of two or three thesis examiners. In this regard also, some universities acknowledged that the AVCC review of honours standards (some years ago) had been greatly influential in developments within relevant faculties in their own institutions. In a rare practice, the Institute of Chartered Surveyors appoints two independent examiners to review examination papers and scripts in their own field each year. An indirect form of an external benchmark operates where universities permit students to take some of their programme at or from another institution.

Benchmarking generally remains at a fairly embryonic level in Australian institutions and in relation to the benchmarks for degree standards is moving at glacial speed. Some universities have selected a single other university—sometimes an Australian one, sometimes an overseas institution—against which to benchmark standards of performance in some areas, although not at this stage degree standards. Whatever might be gained in other areas of operation by such an arrangement, it seems unlikely to do much for the validation of degree standards. In this area in particular the bilateral experience cited above suggests the need for at least a small cluster of institutions to be involved to make the comparisons meaningful and to produce constructive outcomes. In the case of the UK—to be discussed below—external moderation of degree standards has been taken to system level, through the use of external examiners and the development, now in train, of sets of benchmarks as a guide to standards for the award of degrees in each field.

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5 Quality of graduates

Many of the processes described in the last chapter relate to input: to the development of curriculum, to staff qualifications, to adequacy of equipment and other facilities. The quality of a degree should really be judged by output, that is, by the quality of the graduates.

5.1 Skills sought by employers of graduates

In 1992 the Higher Education Council commissioned a study which was published by the National Board of Employment, Education and Training as *Skills Sought by Employers of Graduates*. This study was based both on the collection of newspaper advertisements for graduate positions and on a survey of employers of new graduates. This was followed in 1998 by a study in the Evaluations and Investigations Program *Research on Employer Satisfaction with Graduate Skills* (A C Neilson, 1998). The findings are compatible, and the later report reproduces a table from Bruce Guthrie's work (1994) *Graduate Labour Market Survey* for the Graduate Careers Council of Australia (GCCA). The table compares the emphasis given by employers and by academics to the desired characteristics of university graduates, and reveals sharp disparities in expectations of generic skills. They are ranked in importance by the two groups as follows:

	Business	University
Communication skills	1	7
Capacity to learn new skills	2	5
Capacity for cooperation	3	8
Capacity to solve problems	4	3
Ability to apply knowledge	5	4
Capacity to work alone	6	6
Theoretical knowledge	7	1
Capacity to use computers	8	2
Understanding of ethics	9	12
General business knowledge	10	11
Specific work skills	=11	9
Broad background general knowledge	=11	10

Some disparities are only to be expected—for instance, that universities would place more emphasis on theoretical knowledge than would a practically-oriented business. However it is surprising that universities would rank understanding of ethics even below where business would rank it, and astonishing that universities would rank communication skill so low when business rates it as the top skill.

The Business/Higher Education Round Table has also published studies of the skills valued by employers of graduates, which confirm those listed above.

5.2 Desirable attributes of graduates

In the light of the Australian Qualifications Framework it is interesting to note that many universities have produced statements of the attributes or qualities which they aim to develop in their graduates. These form part of each University's strategic plan. The statements from the University of South Australia, the University of Wollongong and Monash University are quoted below.

A graduate of the University of South Australia:

- operates effectively with and upon a body of knowledge of sufficient depth to begin professional practice;
- is prepared for life-long learning in pursuit of personal development and excellence in professional practice;
- is an effective problem solver, capable of applying logical, critical, and creative thinking to a range of problems;
- can work both autonomously and collaboratively as a professional;
- is committed to ethical action and social responsibility as a professional and citizen;
- communicates effectively in professional practice and as a member of the community; and
- demonstrates an international perspective as a professional and as a citizen.

The attributes of a Wollongong graduate are 'the touchstone against which the University's academic programs are compared and against which, ultimately, the University's effectiveness can be measured':

- a commitment to continued and independent learning, intellectual development, critical analysis and creativity;
- coherent and extensive knowledge in a discipline, appropriate ethical standards and, where appropriate defined professional skills;

- self-confidence combined with oral and written communication skills of a high level;
- a capacity for, and understanding of, teamwork;
- an ability to logically analyse issues, consider different options and viewpoints and implement decisions;
- an appreciation and valuing of cultural and intellectual diversity and ability to function in a multi-cultural or global environment;
- a basic understanding of information literacy and specific skills in acquiring, organising and presenting information, particularly through computer-based activity;
- a desire to continually seek improved solutions and to initiate, and participate in, organisation and social change; and
- an acknowledgment and acceptance of individual responsibilities and obligations and of the assertion of the rights of the individual and the community.

Monash University's strategic plan asserts that:

graduates from all universities irrespective of their discipline should not only have intellectual strength but high order communication skills, well developed inter-personal skills, information and numerical literacy, a capacity for cooperation and team work and appropriate decision-making skills.

In addition to the generic qualities expected of all graduates, Monash programmes must enable its graduates to:

- be instilled with intellectual and cultural curiosity as a preparation for self-directed, lifelong learning;
- seek the imaginative approach to problems and to attempt always to set the agenda rather than follow the well trodden path;
- have the knowledge, competence, skills and attitudes that will enable them to lead and accomplish in their chosen employment fields in Australia or overseas;
- have a broad and critical understanding of knowledge in order to encourage and enable a continuing professional approach to work, community responsibilities and personal development; and
- have an understanding of different cultures that enriches experience and challenges assumptions.

These are all commendable qualities. The universities expect that their academics will devise courses which will achieve these outcomes. Some universities require faculties to take 'graduate characteristics' into account in their course design, teaching and assessment but, so far as we know, only the

University of South Australia produces a guide to writing course and subject documents to assist staff to develop these qualities in their students. This guide sets out performance indicators for each quality and provides yardsticks to calculate to what extent each quality is developed in any given unit.

We have seen above some of the qualities which employers desire in graduates; we have also seen the attributes that some universities seek to develop in their graduates. What mechanisms are there for ascertaining whether or not these qualities and attributes have been attained? For instance: the University of Canberra (UC) is intending to end its present course accreditation arrangements (see pp 21–2) and replace them with an arrangement which focuses more on outcomes, such as student satisfaction, employer satisfaction (including use of the Graduate Destinations Survey (GDS) and surveys of community perceptions.

Most, if not all institutions now have provision for periodic reviews of their courses and departments. Some of these reviews might assess the qualities of recent graduates; it would take an extensive national survey to discover how widespread this practice is, and whether it leads to positive action.

The generic intellectual characteristics which an institution aims to impart could be a basis for an instrument if the institution were minded to test standards across fields. While the test may have to be field-specific, there would be common underlying dimensions capable of being assessed across disciplines. Some idea of standards across fields in the one institution is possible where there is a common course or test on some of the generic intellectual skills which are becoming an explicit part of higher education objectives. For example at the University of Missouri at Columbia all schools are required to teach a final year unit which, in effect, asks the students to stand back from the particular specialisms they have learned and to consider the discipline or profession as an integrated whole and its relation to the social context. The 'exam' is a 3000 word mini-thesis and all scripts must be retained for independent scrutiny on the assumption that there are common underlying dimensions of intellectual performance which can be monitored across fields and over time. In Australia, the Australian Council for Educational Research has been commissioned to produce a report and possibly a test instrument on generic skills in higher education.

5.3 The Australian Qualifications Framework

As a result of the world-wide resurgence of interest in competency-based education and training and, within Australia, the desire for uniform standards and portability of qualifications, Australian labour market authorities have adopted the Australian Qualifications Framework (AQF). This 'provides a comprehensive, nationally consistent yet flexible framework for all qualifications in post-compulsory education and training' and was introduced Australia-wide from the beginning of 1995 (Australian Qualifications Framework, 1998)

The Guidelines for the AQF 'contain the main criteria for defining qualifications based on the general characteristics of education and training at each qualification level. These characteristics are expressed principally as learning outcomes'. One of the functions of the AQF is to 'promote national and international recognition of qualifications offered in Australia' (p.2). The range of qualifications covered by the AQF is from the Senior Secondary Certificate of Education (usually obtained in the final two years at secondary school) through a number of levels of vocational education and training to the various levels of higher education up to the doctorate.

For the current project, the statements on the Bachelor degree are the most relevant:

1. Purpose

To assist employers, professional associations, curriculum developers, accrediting bodies and the wider public, including students, parents, and education and training bodies to understand factors determining the level of the qualification.

2. Context

These Guidelines replace the RATE Descriptions which have previously been used to provide guidance on qualification levels.

3. Learning Outcomes

3.1 Authority

Objectives and academic requirements of courses are set by universities having regard for requirements set by peer review and the requirements of relevant professional bodies and employer groups. Universities may establish course advisory committees comprising a range of interested parties including practitioners, employers, community representatives and academic staff from other institutions to facilitate ongoing review of content and relevance.

3.2 Characteristics

Characteristics of learning outcomes at this level include:

- *the acquisition of a systematic and coherent body of knowledge, the underlying principles and concepts, and the associated problem-solving techniques;*
- *development of the academic skills and attitudes necessary to comprehend and evaluate new information, concepts and evidence from a range of sources; and*
- *development of the ability to review, consolidate, extend and apply the knowledge and techniques learnt.*

A course leading to this qualification also usually involves major studies in which significant literature is available. Course content is taken to a significant depth and progressively developed to a high level which provides a basis for postgraduate study.

4. Responsibility for Assessment

Responsibility for assessment lies with the institution that issues the Degree.

6 The options

There are four possible models outlined in the brief and to be evaluated as possibly meeting the Government's objectives in this area. The models are:

- 1 Refinement of the current model
- 2 The NZ model
- 3 The UK model
- 4 The Vocational Education and Training (VET) model in Australia

In addition we have been asked to make a brief survey of practices in USA, and have added some comments on Sweden. These descriptions and evaluations are presented in this chapter. The brief also requests that a 'Modern Australian Model' be developed and evaluated. This is done in the following chapter.

The set of criteria given for assessing the models is:

- credibility—how well the model would be credible with international and domestic interest groups and potential customers, and the 'marketability' of the arrangements;
- effectiveness, ability to address learning outcomes as well as the quality assurance process;
- ability to provide legal clarity for students and providers;
- ability to promote and enhance good practice;
- how well the model could build on the key features of the Australian higher education system, where universities are established under State/Territory/Commonwealth legislation as autonomous institutions with the power to accredit their own courses, and where higher education courses developed and delivered by other providers are accredited by State/Territory bodies;
- how well the model could exploit the role of professional associations in accrediting courses;
- minimum prescription and bureaucracy; and
- cost.

6.1 Refinement of the current model

Under this model, institutions are expected to develop their own private quality assurance and accreditation arrangements with minimal intervention from government or any other external agency. After the Wilson Committee there is no comprehensive audit of these arrangements, but institutions are required to make annual submissions to DETYA on quality assurance and improvement in the Profiles context, and DETYA subsequently publishes the plans submitted.

Assessment of Model 1

The current model has both strengths and weaknesses. It respects the autonomy of institutions, it incurs no costs beyond what any institution would spend on its internal assessments and administration, it allows input from professional associations to the design of professional courses, it does not involve intrusion by governments or outside bodies into the teaching and learning process. It is also familiar to all those working within Australian higher education. All these are positive features.

The weaknesses are obvious. There is no guarantee of standards; the graduate and the public must simply take the institution's word for them, with no scrutiny and no prospect of appeal. The institution may well set up quality assurance processes, but there is no telling how well these are working and what is the quality of the graduates. Where the British and the New Zealanders, and the graduates of those US universities that belong to the various accrediting agencies, can say: 'Our standards are guaranteed by this or that agency', the Australian university can say only: 'Our standards are guaranteed by ourselves'—a statement which to sceptical minds lacks a certain credibility.

One could improve this model, while keeping the existing quality assurance and accreditation processes largely the same, with the development of a common approach in regard to new institutions and for accrediting courses to be delivered by private providers. We are aware that the Ministerial Committee on Education, Employment, Training and Youth Affairs (MCEETYA) has established a working party on this topic.

In discussing The Modern Australian Model (see below) we propose that a national agency be established. One of its functions would be to collaborate with the States and Territories on accreditation matters. Its other function would concern quality.

Some institutions suggested to us that they strengthen their internal mechanisms by becoming involved in benchmarking exercises such as *Universitas 21*, or by seeking accreditation through external agencies such as GATE, or having their processes assessed according to ISO standards. We are not entirely sure that such international agencies provide for benchmarking in the detailed and rigorous manner proposed by McKinnon et al (1999) or Meade (1998).

Most of these measures relate to processes rather than outcomes. An outcome-based mechanism might be an agreement to use external examiners at the undergraduate level for the final year, as has been the practice for decades in Britain; however the British clearly regard this as inadequate, since they are moving towards a more extensive system involving the establishment of a set of benchmarks defining standards for the award of degrees in the main areas of study, coupled with external reviews of the work of departments. In the final chapter of this report we have more to say about the benchmarks for the intellectual standards of degrees as distinct from the benchmarking of processes which lead to performance.

6.2 The New Zealand Models

Background

In 1990 the then New Zealand Government proposed to unify quality assurance arrangements across the tertiary education sector by establishing a National Education Quality Authority (NEQA) as an overarching statutory body, with quality assurance responsibilities covering universities, polytechnics and private providers. In the event, the strength of opposition from the university sector dissuaded the government from proceeding with NEQA. Instead, the New Zealand Vice-Chancellors' Committee (NZVCC) was given 'in lieu' status to manage quality assurance arrangements for the university sector, and the New Zealand Qualifications Authority (NZQA) was created as a statutory body with responsibilities covering the remainder of the tertiary sector including degree courses in polytechnics and private colleges. At the same time commonly agreed criteria for the accreditation of degree courses were gazetted to achieve national consistency.

The NZVCC used its own Committee on University Academic Programmes (CUAP) as the instrument for quality assurance operations at course or programme level. The NZQA on the other hand relied on expert panels to assess proposals for the introduction of degree courses in polytechnics and private colleges. For quality assurance at whole-of-institution level, the

university sector in 1993 established the Academic Audit Unit (AAU) with its own Board independent of the NZVCC to conduct comprehensive audits of quality assurance processes and mechanisms in the seven universities in the system. In addition, the AAU has carried out an audit of the course approval function of the CUAP. The NZQA has no comparable audit role with respect to polytechnics and private providers, but it is the principal source of advice to the Minister on the accreditation of new entrants to the system, including universities.

In November 1998 the Government issued a White Paper entitled *Tertiary Education in New Zealand: Policy Directions for the 21st Century*. In the area of quality assurance, the paper reverts to the earlier notion of a single overarching authority, now to be called the Quality Assurance Authority of New Zealand (QAANZ), while retaining much of the present framework of agencies in a layer of Quality Validation Bodies (QVBs). A QAANZ Pre-establishment Team was set up to report by September 1999 on key issues affecting the implementation of the new quality regime. In August the new Minister announced that, with the exception of the proposals relating to quality assurance and the governance of institutions, the White Paper would be set aside. Instead, a Higher Learning Sector Taskforce would be appointed to report by June 2000 on a range of policy and resourcing issues affecting higher education.

The original intention was to introduce legislation to establish QAANZ in 1999, with the year 2000 to be a transitional one before full implementation of the new arrangements in 2001. It has not proved possible however to ready legislation for passage before Parliament is prorogued for the general election in late 1999. In lieu, a senior adviser on quality assurance is to be appointed to work with the existing QA bodies collegially and in a leadership role to prepare the way for the new regime. Although the notion of an overarching quality assurance body appeared to attract wide support in the public discussion of the White Paper, the alternative government has given no specific commitment to its establishment should it come to power in the near future.

Against that background, the following sections describe in more detail the still existing set of arrangements for quality assurance in the university sector and the proposed new arrangements.

Current arrangements

The New Zealand Universities Committee on University Academic Programmes (CUAP)

CUAP was established in 1989 as a successor to the Curriculum Committee of the University Grants Committee, but over the years its task has changed in both scope and focus. The NZVCC has given it an increasing policy role in academic matters (such as the definition of degree courses, criteria for joint degree programmes, and guidelines for the recognition of prior learning). In focus it has moved from deciding between possibly competing developments to pronouncing on the expected academic quality of proposed courses or amended courses. It is estimated that the course approval work represents about 30–40 per cent of CUAP's workload; its role in relation to the coherent and balanced development of courses is practically defunct as the pressure of competition among universities increases.

Each university has a representative on CUAP, usually a Deputy VC or Pro-VC in charge of academic programmes. The course approval process is in this sense a collegial one, based on peer review, and universities can feel more comfortable about CUAP's power to reject proposals than if they were relying on a small panel drawn from only some of the universities. The Association of Polytechnics of New Zealand and the New Zealand Council for Teacher Education are also represented at director/principal level. Relevant issues in this regard are the increasing number of degree programmes outside the university sector, and the increasing number of teacher education programmes within the university sector. The New Zealand University Students Association is also represented on CUAP.

A course proposal has to proceed through various deliberative bodies in a university before it reaches CUAP. The stages and processes of internal scrutiny differ in no important respect from those for Australian universities, as outlined earlier in this report. When approved by the University Council, the proposals which fall into the categories to be submitted to CUAP are sent to NZVCC, while minor proposals are dealt with on the campus. Where a university seeks to make changes to its offerings in a professional area, it is its responsibility to seek agreement from the professional body concerned and to provide CUAP with evidence that agreement has been obtained. The role of the professions in course design is less prescriptive in New Zealand than is the case in Australia.

With CUAP membership structured as it is, a university's plans for substantial change in its offerings are available for comment, and susceptible to change in the light of that comment, across the entire state-funded tertiary education

sector. Following scrutiny in this way proposals may be approved without alteration, or debated and resolved by a meeting of CUAP, or referred back to the university, or rejected.

In its audit of the relevant CUAP functions the AAU noted that CUAP concentrates more on the 'front end' task of examining course proposals than on those parts of its role to do with course moderation and monitoring. The audit report suggested that 'since the AAU explicitly audits the universities' course monitoring mechanisms, CUAP could accept as sufficient for its purposes the AAU audit reports on the effectiveness of the course monitoring systems in each university'. The report went on to observe that this could also apply to the course approval and accreditation functions. It seems likely that for the time being CUAP will look to an alternative means of meeting its responsibilities for course moderation and monitoring, a problem with relying on AAU processes being the long cycle time between AAU audits of each university. As pressures for deregulation and competition among universities increase, however, the need to retain a central course approval arrangement seems likely to come under closer questioning.

New Zealand Universities Academic Audit Unit

The Academic Audit Unit (AAU) was established by the New Zealand universities 'so as to ensure that they will have effective mechanisms to ensure the quality of their academic activities'. It carries out an academic audit of each university. The AAU's responsibility extends beyond the individual universities to incorporate comment on the adequacy and effectiveness of CUAP's course approval mechanism, given that it is a quality assurance mechanism used by all of the universities.

The Unit's terms of reference are:

- to consider and review the universities' mechanisms for monitoring and enhancing the academic quality and standards which are necessary for achieving their stated aims and objectives;
- to comment on the extent to which procedures in place in individual universities are applied effectively;
- to comment on the extent to which procedures in place in individual universities reflect good practice in maintaining quality; and
- to identify and commend to universities good practice in regard to the maintenance and enhancement of academic standards at national level.

In carrying out its functions, the AAU may investigate any matter that it believes affects academic quality, but it has nominated quality assurance in the following areas as being of particular importance:

- the design, approval, monitoring and evaluation of courses;
- teaching, learning and assessment;
- the appointment, development and performance of academic and other staff who contribute directly to the teaching and research functions;
- research, including its support and evaluation, and particularly its relationship with university teaching; and
- listening to clients and taking account of the views of students, of external examiners, of professional bodies, and of employers in respect of academic matters.

The AAU has made it clear in its handbook that it is not an inspectorate, but operates in an audit mode, the implication being that it does not directly assess quality, nor does it assume absolute academic standards.

The AAU Board is appointed by the NZVCC and includes nominees of the national students' association, university staff association, employers' body and trade union body, professional associations, the AVCC and the community. It includes a vice-chancellor, but not in a chairing role. It draws its audit panels from a register of auditors comprising senior retired and active academics from New Zealand and Australia, and other professionals with relevant background and expertise.

The AAU audited the seven universities in the period 1995–98. It is now embarked on a series of nationwide theme audits on selected aspects of university operations, with each university being audited in turn on that theme over a twelve-month period.

The audits are based on institutional self-assessment, backed up by panel visits of two to three days' duration to test claims and evaluate quality assurance processes. Audit reports are published after institutions are given an opportunity to correct any factual errors in the draft report, and there is follow-up by the AAU on areas identified as being in need of improvement. The AAU has shown its preparedness to publish reports critical of inadequacies in quality assurance policies and practices within individual universities. No specific sanctions, other than reputational loss, attach to poor performance in these terms.

In 1997 the AAU Board initiated an external review of AAU's operations to that time. The Review Panel's report endorsed the 'continuing value of the AAU and the audit process to the university sector both in terms of public accountability and the impetus it gives the universities to examine, measure

and improve their performance'. While noting that penetration has been uneven across the university sector, the panel concluded that the audit process has been a cost-effective stimulus to reform and culture shift in the universities with respect to quality matters. The panel recommended that the next cycle be a six-year one, comprising three theme audits followed by a second round of comprehensive audits after the fashion of the initial round but with a concentration on outcomes as well as processes across the range of university activities. 1999 is the first year of the new cycle.

New Zealand Qualifications Authority

The New Zealand Qualifications Authority (NZQA) was established on a statutory basis to coordinate national qualifications. It took over the functions of several agencies that had run schools, trades and vocational examinations. It also assumed new responsibilities, notably to develop a national qualifications framework and to approve non-university degrees.

NZQA's mission is to promote improvement in the quality of education in New Zealand through the development and maintenance of a comprehensive, accessible and flexible national qualifications framework. In essence, the NQF is a means by which tertiary qualifications have a high credibility both nationally and overseas, and are related to each other in ways that assist people to upgrade their qualifications without having to repeat unnecessarily previous study and assessment.

NZQA is the principal advisor to the government on the accreditation of institutions at all levels, and on the accreditation of degree courses proposed by polytechnics and private institutions. For university accreditation NZQA appoints an expert group to assess applications against the criteria laid down in legislation. It is presently assessing a submission for recognition as a university from the Auckland Institute of Technology. NZQA has no effective way of handling Internet providers of degree courses; they will be free to operate in New Zealand, as are Australian university distance education providers presently. (New Zealand universities likewise enrol Australian and overseas students in their distance education programmes). The real issue will be whether NZ students taking Internet courses will be eligible for student loans.

Tasks relating to university quality and qualifications carried out by NZVCC by virtue of its 'in lieu' status are the subject for consultation with NZQA, generally through the auspices of the Joint Consultative Group. NZQA has published criteria, drawn up in consultation with NZVCC, for the approval and accreditation of degree courses, as required by the Act, and these criteria are observed by both CUAP and NZQA in their course approval operations.

NZQA uses expert panels, which include members nominated by CUAP, in assessing degree course proposals from polytechnics and private institutions. There are presently about 200 approved degree courses in the non-university sector. For approved courses, NZQA appoints a mentor to facilitate and monitor course implementation and development. The mentor is paid by the institution and reports to NZQA. The role is a formative one, but consideration is being given to having mentors involved in final examinations, to ensure that standards are being met.

Much of NZQA's operational work has been occupied with the development of unit standards (cf. competency standards in the Australian VET sector) as an underpinning for the mutual recognition of qualifications nationally. This includes standards for unit elements of degree and diploma courses in the non-university sector. To back up the unit standards, NZQA runs a national moderation system involving 800 contracted moderators. Moderation may take a variety of forms, including the sampling of scripts organised by region or by field.

NZQA presently has no audit role as such, but is giving consideration to moving to a system of self-accreditation of degree and diploma courses in the case of well-established institutions, combined with a quality audit. It provides for a measure of self-accreditation at present, though without the benefit of audit, for non-degree courses that are clearly within the agreed scope of established institutions.

Under the new arrangements proposed in the 1998 White Paper, NZQA will need to be repositioned as a Quality Validation Body (QVB) with a main focus on validating the quality of qualifications and providers. Progressively its other activities (for example, development of unit standards) would be transferred to other bodies.

The proposed new model

The proposed reforms will result in a new level of authority located above existing arrangements and embodied in an institution called the Quality Assurance Authority of New Zealand (QAANZ). All institutions will have to be checked by a Quality Validation Body (QVB) and all QVBs will have to be approved by the QAANZ. The parameters for QAANZ approval, which will include a QVB's ability to review both institutions and programmes, are outlined in the White Paper, but the details are being worked by a 'QAANZ pre-establishment team'. Initially, the NZ Qualifications Authority, the Polytechnic Programmes Committee and the NZVCC system (CUAP plus AAU) will be accepted as QVBs.

The AAU and CUAP together see themselves as covering most of the foreshadowed requirements of a QVB, but a student complaints procedure and a system of sanctions for non-performance will have to be devised. Institutions will no longer be restricted by sector in which QVB they can use, but QAANZ is expected in some way to prevent or deter 'QVB shopping'. The AAU is working, separately and with CUAP, on ways of building on the AAU to address the new environment.

The reforms reflect the Government's concern with standards, with the diversity of purposes served by tertiary education, with compliance and with 'transparency'. It is asserted in the White Paper that:

The tertiary review identified a number of problems with the current external quality assurance system. The term 'quality assurance' refers to processes that ensure the quality of qualifications, teaching, and research. Current arrangements treat different types of public providers unevenly. The lack of good information makes the current quality assurance processes largely obscure to the public. The mechanisms for auditing the performance of tertiary providers, for ensuring compliance with required standards, and for handling complaints about quality are weak.

The key decisions of the White Paper are that:

- to be eligible for government funding, tertiary providers and qualifications developers will need to be quality assured through a recognised quality validation process;
- recognised quality validation processes will be those judged to be sufficiently robust by the impartial overarching regulatory authority, the Quality Assurance Authority of New Zealand;
- the Quality Assurance Authority will recognise appropriate quality validation arrangements for all publicly funded providers and qualifications. (It will not be involved in financial viability considerations);
- tertiary providers and qualifications will be audited by processes recognised by the Quality Assurance Authority to ensure that they continue to conform to required standards;
- breaches of compliance with quality standards by providers will be publicly notified and, if not addressed, will ultimately result in the withdrawal of accreditation and consequently of government funding;
- recognised quality validation processes will include mechanisms for resolving student complaints relating to quality;
- interim recognised quality validation processes will be those currently operated by NZQA (to be renamed Quality Validation Services), NZVCC, and Association of Principals NZ; and

- it will be possible for the Quality Assurance Authority to approve international quality validation processes for use in appropriate cases.

The functions of the Quality Assurance Authority will be:

- to recognise national and international quality validation processes that are sufficiently robust to affirm that the quality of qualifications and of educational provision is suitable for public funding;
- to monitor the performance of recognised quality validation processes and to censure, or withdraw recognition from, any that perform poorly;
- to monitor cases of non-compliance with quality standards and monitor student complaints;
- to facilitate international mutual recognition agreements; and
- to ensure that recognised quality validation processes cover the full range of qualifications at all levels, build on the relationships between qualifications, and support the proper naming and description of qualifications.

Recognised quality assurance processes will be required to meet the following criteria:

- They must be operated by bodies with the necessary expertise, impartiality, and resources to be credible judges of educational quality.
- They must use clear and explicitly stated quality standards against which tertiary providers and qualifications can be assessed. In general, these quality standards would be expected to:
 - promote responsiveness to labour market needs;
 - promote comparability with international standards;
 - reveal accurate information about quality to students; and
 - recognise academic freedom and institutional autonomy.
- They must ensure that, where relevant, quality standards must also comply with the Government's guidelines on research.
- They must include procedures for ensuring ongoing compliance with the set quality standards. This will include the regular audit of tertiary providers following initial accreditation and a tiered range of sanctions to be used if providers and courses fall below standard.
- They must ensure that standards, processes, and decisions are fully transparent and publicly accessible.

When any tertiary provider or programme of study has its quality accreditation withdrawn government funding will cease. The focus of the external quality validation process will be to provide strong reasons for tertiary providers to maintain quality rather than face public notification of non-compliance and, ultimately, the loss of government funding.

The new approach will provide strengthened mechanisms for resolving student complaints relating to quality. Although providers' internal quality assurance processes will continue to offer a method of resolving student concerns about quality, when this method proves unsatisfactory, external quality validation bodies will provide an alternative route. Complaints about the adequacy of quality validation process will automatically be notified to the Quality Assurance Authority.

The performance of recognised quality validation bodies will be monitored by the Quality Assurance Authority. The Authority will be able to impose sanctions on, and ultimately withdraw its recognition from, a quality validation process that does not perform adequately.

All approval and accreditation decisions, as well as audit reports and compliance failure, will be made public.

Summary and assessment

Both the current and the proposed system are based firmly on the philosophy of institutional self-assessment of the quality of academic processes and outcomes, supplemented and validated by an external audit of the effectiveness of quality assurance arrangements within institutions. To date the focus has been much more on academic processes than on academic outcomes. External input into the maintenance and improvement of academic quality comes also from periodic peer reviews of the work of departments, and at course level from the involvement of the professions in course design and CUAP in course approval. These processes may be considerably spaced in time and/or limited in scope, however, and no formal requirement exists for quality improvement to be ongoing and monitored between audits and reviews.

Neither the current nor the proposed arrangements involve any direct system-wide monitoring or validation of degree standards. The assumption is that an acceptably good 'floor' standard is being achieved across the system, while allowing that there may be variations in standard above that threshold. That said, the practice of external examining at final year undergraduate level, while not exactly widespread, appears to be relatively more common in New Zealand universities than it is in Australian ones.

There is increasing attention to graduate profiles or attributes, and to graduate destination and later follow-up surveys as elements of quality assurance. The CUAP now requires that graduate profiles be included with submissions for course approval and some universities are extending the requirement, over time, to cover existing courses as well. This resonates with the 'fitness for purpose' perspective on quality in the 1998 White Paper. It also anticipates the increased attention likely to be given to outcomes in future QA

developments. The draft report of the QAANZ Pre-establishment Team had this to say on outcomes:

Graduate Profile

It is expected that each provider will prepare an explicit profile which will describe in terms of outcomes the performance standards expected to be achieved by the 'graduates' from its different qualifications...

Assessment

...As appropriate, providers and developers should be able to demonstrate that the standards embedded in the assessment are nationally and internationally comparable.

The latter point is being interpreted as showing that graduates are successful in gaining employment in the graduate labour market and, where relevant, are competitive in relation to scholarships for further study at home and abroad.

The suggestion in the White Paper that the new system would 'allow students to compare and contrast the quality of various courses and establishments' is seen on reflection to have been an over-statement. Students have access to a national register of quality-assured providers and courses, and the course descriptions may be 'thicker' than currently exists in university handbooks, but students will have no objective means of assessing the relative worth of different courses.

While there is a new emphasis on robustness and impartiality in the rationale given in the White Paper for the establishment of QAANZ, there is no disposition for the introduction of more direct ways of validating degree standards across the system. Practices such as system-wide scrutiny of examination scripts, or the benchmarking of degree standards, are seen as overly intrusive and tantamount to imposing a national curriculum. In this context it is relevant that the concepts of academic freedom and institutional autonomy are enshrined in legislation in New Zealand.

Where benchmarking and performance indicators more generally are concerned, developments are at a fairly early stage. Benchmarking has been initiated by some universities at faculty and/or institutional level. Typically, international comparators are being used, and the focus is on academic and administrative processes, not outcomes or degree standards as such. The national data collection on university education yields routine statistics only at this stage and there appear to be no plans current to develop more sophisticated performance indicators. At least two universities are using performance indicators for internal management purposes, but the AAU has

reported that institutions are very sensitive about the possible misuse of indicators, especially for the purposes of simplistic comparison. In similar vein there is strong aversion to ranking tables, reinforced by the experience of those universities which have lent themselves to participation in regional ranking exercises.

In summary, New Zealanders believe that their systems of quality assurance—including external course approval mechanisms and institutional audit based on self-assessment—measure up well in international terms, with the AAU being seen as a leader in its field. The QAANZ arrangements, by extending the arms-length character of the regime and embodying sanctions for poor performance, would add a further dimension of credibility, although they seem likely to have their principal impact elsewhere in the tertiary sector.

Viewed against the criteria set out in the project brief, the present NZ system rates well on the score of non-intrusiveness by government, minimum prescription and bureaucracy, and on acknowledgement—but no more than that—of the role of the professions in course accreditation.

It is a moderate cost system, it has earned a fair degree of credibility by its preparedness to be critical of deficiencies in university quality assurance mechanisms, and can claim success in promoting and enhancing improvement and good practice.

It rates low on legal standing with its ‘in lieu’ status and lack of specific statutory recognition of AAU, and on its ability to address standards in addition to quality assurance processes.

The proposed new system would rate more highly on legal standing, would be perceived as somewhat more credible, but also more intrusive and regulatory, and would add to costs without ostensibly being any more able to address standards than the present system. It is intended to have a greater capacity to promote and enhance quality improvement.

6.3 The UK model

Quality assurance for higher education in the United Kingdom

Background

During 1970s and 1980s the polytechnics in the United Kingdom (UK), like the colleges of advanced education in Australia, were a major locus of change in higher education, especially in curriculum development and teaching; and

both were subject to quality controls. But whereas in Australia the control took the form of scrutiny of proposals for courses, in UK education processes and standards were vetted. This approach has continued into the present quality regime.

The 1992 Act placed upon the Higher Education Funding Councils (HEFC(s); or HEFCE for England, HEFS for Scotland, HEFCW for Wales) a statutory requirement to ensure that 'the outcomes of assessment visits are in a form which can be used to inform funding allocations. Reports of visits should be published. The Council should seek to ensure that serious shortcomings identified in reports are addressed by institutions and monitored by the Council.' (Secretary of State for Education. Quoted in Alderman). Since 1997 the Quality Assurance Agency (QAA) has been contracted by the HEFCs for this purpose.

The Quality Assurance Agency was formed in 1997. It brings together the functions previously carried out by Higher Education Quality Council (HEQC) on behalf of the universities and the quality assessment functions of the funding councils. It is intended that the new arrangement will also embrace some of the quality review activities of various professional bodies which presently scrutinise subject areas preparing students for practice. An objective of Vice-Chancellors, in working to establish the QAA as the one body for all of the UK, was to reduce the number of agencies engaged in quality activities. The universities not unnaturally wanted ownership of the quality process and certainly did not regard the funding councils as appropriate for the responsibility. The outcome was the independent QAA, a company limited by guarantee, and with substantial academic representation on its board. But, as will be seen, the proliferation of quality activities has not been stemmed.

The National Committee of Inquiry into Higher Education (NCIHE or Dearing report in England, Garrick report in Scotland) believed that balanced development of the mass system of higher education which had grown rapidly, and without much planning, in the 1970s and 1980s required better information for students, for planners and for universities themselves; and better accountability in return for the substantial public funding that was involved. In particular concerns were expressed in the reports about the quality of teaching and learning, the standard of awards and the need for public information.

There was also a feeling that the status of teaching and learning would benefit from an assessment exercise, just as research had. There has been some impact, but because HEFCE does not attach resource decisions to its judgements (except in instances where the institution has been judged as

unsatisfactory) it means that, for better or worse, teaching behaviour is not 'steered' in the fashion of research behaviour.

A particular stimulus towards the formation of an independent quality agency arose from criticisms, made in 1994 to the Minister, by employers and governments in Malaysia and Singapore about the standards of graduates from the off-shore operations of UK universities in those countries. The HEQC responded to the Minister's invitation to pay greater attention to 'broad comparability' of standards with a 'Graduate Standards Project' which concluded that each main field should identify the general intellectual qualities that ought to characterise a graduate. The theme has subsequently been taken up in the QAA benchmarking exercise.

During the last ten years, as national quality policies have intensified, four tensions have characterised the debate over what should be done to ensure quality: the traditional autonomy of universities versus public accountability; evaluation that is formative versus that which is summative; conclusions expressed in narrative terms versus quantitative summations; and a methodology designed to assure that universities have procedures in place that will lead to good outcomes versus methods which focus more directly on assessing the standards used in deciding on whether a student will be graduated. Not unexpectedly universities have tended to favour the first of each of these alternatives, governments have inclined to the second.

Technically the QAA is 'owned' by the universities, specifically the Committee of Vice-Chancellors and Principals (CVCP). It is a company of limited guarantee, the members being the CVCP, the Standing Committee of the Conference of Principals, the Heads of Higher Education Wales and the Conference of Scottish Higher Education Principals.

The funding councils have a legal obligation to ensure that a proper system of quality assurance is in place and must approve any changes that QAA may wish to make; for example changes to the system of grading used in reviews of university departments.

In 1997–98 the QAA spent the equivalent of Aust.\$20.5 million. Of this about \$10m went on teaching quality assessments (159 reports in 1997–98); institutional reports \$2.5m; administration accounted for about \$5m. Individual universities pay compulsory subscription fees which total about \$8m a year or 38 per cent of total income. Nearly all the remainder of the annual income of approximately \$20m comes from the funding councils. In 1997 the QAA itself generated \$0.75m.

Quality assurance and academic standards

The QAA objective is to promote continuous improvement in the quality and standards of higher education provision and to provide accessible and useful public information about higher education to meet the needs of students, employers and the funders of HE. It carries out institutional audits and (including arrangements for collaboration with other providers in UK and for off-shore provision of courses) and reviews of provision at subject level, publishing reports which are available to the public. In addition, the QAA supports a range of activities focused on quality enhancement and development.

The QAA is currently carrying out a wide-ranging consultation on a range of proposals and a timetable for developing and implementing the main recommendations for quality and standards as proposed in the Dearing and Garrick reports. These include:

- development of a qualifications and credit framework;
- development of benchmark information on subject standards;
- extending the role of the external examiner; AND
- development of codes of practice.

The QAA also operates mechanisms for recognition of access courses, and provides advice to government on applications for grant of university title and grant of powers to award both taught and research degrees.

The QAA's mission is to promote public confidence that quality of provision and standards of awards in higher education are being safeguarded and enhanced. It is enjoined to do this by:

- working with higher education institutions to promote and support continuous improvement in the quality and standards of provision;
- providing clear and accurate information to students, employers and others about the quality and standards of higher education provision;
- working with higher education institutions to develop and manage the qualifications framework;
- advising on the grant of degree awarding powers and university title facilitating the development of benchmark information to guide subject standards;
- promulgating codes of practice and examples of good practice; and
- operating programmes of review of performance at institutional and programme levels.

The head has been quoted as saying that the purpose of QAA is 'to guarantee the standards, continuous quality improvement, and professional behaviour of

academic staff in the British system' and 'to re-establish collegiality and corporate responsibility and reinforce the importance of teaching which has been displaced by the Research Assessment Exercise.'

The four main activities of the QAA have been:

- 1 Institutional audits of internal quality assurance processes to ensure that these are sufficient for meeting stated institutional missions.
- 2 Discipline or subject reviews of university departments run on a five year cycle which assess teaching against departments own stated objectives. Six dimensions of teaching are defined and each department is scored on each with a four-point scale.
- 3 Development of benchmark standards in each discipline intended to inform employers about what every graduate in that discipline can do. Pilot committees are working on history, law and engineering.
- 4 Overseeing the national qualifications framework

The Agency also administers for the government the law in relation to use of protected terms including university and degree, and assesses institutions aspiring to university status.

The QAA is now working on a fundamental new quality assessment methodology. to be published in September and piloted for implementation in 2000.

In foreshadowing this new approach it notes that, whereas awards from secondary, further and vocational education are subject to statutory regulation, the university sector is self-regulating. It must, nevertheless, as an act of public responsibility, be able to demonstrate no less rigour than that which is applied in the other sectors, to safeguard its own standards.

Institutional Quality Audits

Academic quality audits of institutions go back at least to 1991 when the CVCP set up an Academic Audit Unit. This was taken over by the HEQC which in turn was melded into the QAA. Under the current arrangement the principle purpose of the process is to offer an opinion on the extent to which individual institutions are discharging effectively their responsibilities for the academic standards and quality of their awards and programmes of study. The audit process assumes that institutions have appropriate quality assurance policies and procedures in place and that convincing evidence can be produced that these are working to good effect. The audit checks the extent to which this is the case, and that the methods used by institutions are sufficiently reliable to assure stakeholders as to the future.

In a recent re-statement of purposes the QAA states that the purposes of institutional reviews is to help institutions to safeguard their futures, not merely to make retrospective judgements. As well as identifying areas for possible improvement, reviews will provide ‘detached and analytical views to help an institution know itself.’

Audits focus on four main topics: the institution’s quality strategy, the learning infrastructure, academic standards and communications.

Evidence for the audit is obtained from an analytical report prepared in advance by the institution of its quality assurance arrangements and supporting documents. The latter may include annual planning statements, academic standards handbooks and graduate and undergraduate prospectus, validation arrangements, documents on the world wide web and published reports from Teaching Quality Assessments (see below).

The institution’s analytical account and other submissions are discussed at a briefing meeting and arrangements are made for the audit teams visit. Additional documents, for example minutes of meetings, may be requested prior to the visit.

The audit team’s visit may last for three to five days. In addition to perusal of documents, meetings—perhaps 12 or more—will be held with academic staff and students.

A typical report may run from 15 to 20 pages, the substantive sections covering:

Context for the Audit

The Institution’s Quality Strategy

Academic Standards of Programmes and Awards

The Learning Infrastructure

Internal and External Communications

The Context for the Audit will note any previous audits and recent developments or organisational changes.

Under the heading ‘The Institution’s Quality Strategy’ will be examined strategic planning and reviews, decision making processes and the role of centralised and devolved structures, arrangements for monitoring and reviewing programmes, quality strategies in respect of teaching and research, quality enhancement and the dissemination of good practice.

‘Academic Standards, Programmes and Awards’ will discuss definitions of academic standards, the role of external examiners in the process, other means used to monitor standards, and standards in postgraduate education.

'The Learning Infrastructure' reports on academic staff and their induction, development, appraisal and promotion; and on student support, guidance and academic services.

The section on 'Internal and External Communications' explores the ways in which the institution communicates, including the communication of 'good practice' with internal and external audiences.

A new model for quality assurance and assessment has been developed by the QAA, taking account of numerous criticisms of present practices. These proposals are currently being discussed with the funding councils and universities. It is intended by the QAA that institution audits be more flexible with varying levels of scrutiny, taking greater account of the results of reports of reviews at subject or programme level. Where the evidence is judged to be sufficient and satisfactory little further scrutiny may be needed before the Agency reports. If it is found that an institution's ability to safeguard the quality of its awards is in question then the development and implementation of a recovery plan may be requested; and the Funding Council notified.

Reviews at Subject/Programme Level

Before QAA took over the responsibility reviews at subject or programme level within institutions were carried out by the HEFCs. In England the reviews are the responsibility of the Programme Review Directorate of the QAA.

The reviews are intended to serve the institution with feedback from an informed independent source, and to provide the public with a useful source of information.

Assessments of the quality of educational provision use a two-stage process of departmental self-evaluation and external peer review. There have been some significant changes to the process since its inception in 1992. Initially, judgements were made on a three-point summative scale of 'Excellent', 'Satisfactory' and 'Unsatisfactory'. Not all assessments at that time included a visit to the subject department. Since April 1995 there has been a system of universal visiting and the establishment of a core set of six aspects of provision, each of which is graded on a four-point numerical scale to arrive at an overall profile of the quality of provision.

The Agency employs and trains academic and professional specialists as its assessors. Teams visit departments and, using the institution's own aims and objectives as a starting point, explore the quality of provision in six core areas:

- curriculum design, content and organization;
- teaching, learning and assessment;

- student progression and achievement;
- student support and guidance;
- learning resources; and
- quality assurance and enhancement.

A grade of one in any aspect of the above 'means that the quality of provision in the subject area cannot be approved, and a further review takes place within 12 months.' In 1997–98 two reviews fell into this category.

At the next level up a grade of two is an indication of substantial room for improvement with weaknesses to be remedied. Scores of 2 in three or more of the six areas are regarded seriously and the institution is required to produce an improvement plan that will be monitored by the Agency.

A report is published by the Agency on the completion of each subject review visit. These reports are available on the world wide web. And, although the Agency does not approve of the aggregation of scores across subjects in an institution, the media publish 'league tables' of universities which are read far more widely than the individual subject reports on which they are based.

In England and Northern Ireland the Agency carried out 294 subject reviews in universities in 1997–98, and a further 595 will be completed between 1998 and 2000.

As in Australia, many professional bodies in the United Kingdom undertake reviews of university departments which prepare students for entry to particular professions. Some of these have shown an interest in the Agency's subject reviews and, in 1998–2000 joint reviews are to be undertaken with the General Medical Council, the General Dental Council, and the English Nursing Board.

On the completion of a cycle of subject assessments the Agency publishes subject overview reports commenting on the health and standards in the field or discipline.

Subject reviews have been the QAA's most controversial activity, the most frequent complaints concerning 'bureaucracy' or the amount of documentation which a department has to prepare, the costs of preparing for a review, the excessive precision of conclusions implied by the use of quantitative scales. Newer universities are also likely to complain that assessments are designed with traditional universities in mind and fail to appreciate that the erasure of the binary line has brought new purposes into university education. Nevertheless there appears to be little or no rejection of the need for an external and independent quality agency. The attitude of the

majority of academics and university administrators spoken with for this report is summed up by an academic critic:

... for all its faults there can be little doubt that the QA process does at least have a direct impact on quality and quality enhancement at the level of individual teaching departments. Moreover, the fact that the assessors are largely academic peers should give and often does give their criticisms credibility. (Underwood, 1998)

Pressure from universities has led to proposed revisions of the subject reviews and a modified role for institutional audits. The plans have yet to be approved by all funding councils but it is expected that trials will start in 2000.

If the reforms are approved there will be links of quality assessments with the National Qualifications Framework (NQF) being developed (see below), benchmarking statements in 42 subject domains (see below) and institutional programme specifications.

The new arrangement for subject reviews is intended to be less burdensome to institutions and to be spread over a period of up to one year rather than concentrated in a few days. The subject 'units' will be the 42 areas designated in the benchmarking exercise, the entire field to be covered in a six year cycle.

The two main areas for the review will be teaching and learning, and standards. The review team will examine documents, look at assessment processes—perhaps visiting during an examination period—and meet students. An option will remain for the reviewers to look at students' work.

With respect to teaching and learning questions may include:

Are there clear learning outcome statements?

Are the assessment processes appropriate?

Do they reflect benchmarking and National Qualifications Framework levels?

Is the content and design of curriculum effective?

Is curriculum content appropriate to each stage and level of the award?

Is assessment designed appropriately to measure the stated outcomes?

Does student achievement match intended outcomes?

Assessment of standards will include seeing whether these are broadly in accord with the NQF, the relevant benchmarks and the programme specifications published by the university.

It has yet to be decided whether the narrative evaluations will make use of standard categories such as 'fails to contribute adequately to achievement of outcomes', 'makes a contribution that is no more than adequate' etc.

It is intended that assessments of teaching and learning, and standards should feed in to the institutional audits.

National Qualifications Framework

The unregulated proliferation of programmes and qualifications, and inconsistent nomenclature has been of increasing concern to official committees, especially because of the uncertainty caused among students, employers and others about the intellectual level and precise meaning of many titles and awards. The Dearing report called for a National Qualifications Framework. The problem is regarded as acute particularly at post-graduate level where commercial incentives are seen as tempting providers to cut corners by reducing requirements and deflating standards.

The QAA is inquiring into a National Qualifications Framework and is at present considering the responses to a consultation paper on postgraduate qualifications put out in 1998. The project, when completed, is intended to provide the public with better information about credits needed for qualifications and the levels at which qualifications are awarded.

Basically the idea is to define levels, intellectual standards appropriate to those levels and the quantity of work necessary for an award at that level. For the purpose of defining standards it is expected that subject benchmarking, at present pitched at honours level, will be extended into postgraduate.

There will probably be different frameworks for Scotland and the other UK countries. For example in Scotland there are likely to be four undergraduate levels and two postgraduate levels. An honours degree will require 480 credits of which a minimum of 100 must be from level four.

Standards and subject benchmarks

'Standards' have been a theme in the quality debate in UK for many years. In 1994 the Minister, concerned at overseas criticism, referred the matter to the HEQC.

The NCIHE, in the context of some criticisms of subject reviews, asserted that the academic standards of degrees should be made explicit and independently audited. But it recognised that 'standards should be developed by the academic community itself, through formal groupings for the main areas of study.' It is envisaged that subject associations and, where appropriate, professional bodies, would play a role in developing what it termed 'benchmarks'.

The project is being carried forward by the QAA which plans to have statements prepared by subject groups established for 42 disciplines or fields when the project is complete in two years time. The brief given to the groups asks them to focus on the honours level and to set out the expectations for the award of an honours degree in the subject area. In effect the groups are asked to describe the sort of evidence that is used in determining that a student will be graduated at a particular level. Benchmarks, it is stated, are not about listing specific knowledge (that is a matter for institutions in designing their programmes); rather it is about the conceptual framework that gives a discipline its coherence and identity, and the intellectual capabilities and understandings that should be developed through its study at honours level. Benchmark statements include the techniques and skills which are associated with developing understanding in the discipline; and the level of intellectual demand and challenge which is appropriate.

The envisaged uses for benchmark statements include staff development, subject reviews, external examiners and public information.

So far benchmark statements have been prepared by groups working in history, chemistry and law. It is noteworthy that each statement is different, reflecting the traditions and cultures of each academic discipline. Each group also chose a different level at which its main benchmark should be set—a threshold level in the case of chemistry, a level likely to be attained by a typical student in the case of history and the level required for entry to professional practice in law. But a significant outcome of the exercise was the identification of generic intellectual attributes that are likely to be possessed by graduates generally.

The external examiner system

External examiners act as independent and impartial advisers to university departments, providing them with informed comment on the standards set and student achievement. The system in UK can be traced back to 1832 when the new University of Durham ‘imported’ examiners, mainly from Oxford, as extra hands to assist with the setting and marking of examination papers (Silver, 1994). These extra hands also confirmed to the world the acceptability of Durham’s degrees. At about the same time Oxford and Cambridge began from time to time to import additional examiners from outside, mainly from one another. Subsequently new universities, almost as a matter of course, used external examiners as part of their justification.

Today the system is universal and widely accepted among academics. It is seen as a key mechanism for ensuring that students are dealt with fairly and that standards are maintained and are comparable across universities. Over

the last decade the various quality agencies have regarded it as an integral component of quality assurance. The system is not, however, without its problems and strategies are in hand which are intended to ensure that it is reliable and valid, and that it operates in association with the portfolio of quality assurance measures.

The system is not costly because external examiners are paid only a pittance, unlike the Danish system where there are salaried members of a corps of external examiners in each subject domain.

One shortcoming of the system is that, because departments are responsible for issuing invitations, restricted networks tend to be formed and cosy deals are made, perhaps a withholding of criticism on the expectation that the courtesy will be returned. There is also unevenness in the usefulness of reports written by the external members. Overall however the system is universally judged to be useful, and application of the draft code of practice would eliminate bad practices.

The QAA views external examining as an integral and important component of institutional quality assurance. It states that, from the Agency's perspective, the main purposes of external examining are to verify that standards are appropriate for the award which the examiner has been appointed to examine, to assist institutions compare standards across the sector and to ensure that assessment procedures are fair. It is recognised that there is wide variation between institutions in the detail of external examiner practices; the proposed code is not intended to bring uniformity, but rather to help ensure the security of standards nationwide.

A distinction is made between the roles of the external examiner and the academic reviewer. The former's task is to scrutinise on a continuing basis and report on whether particular students' performances have been judged properly against the university's award standards; and whether assessments are valid and fair. Academic reviewers visit every six years and their task is to identify more broadly whether the university's standards are at an appropriate level. And, while they may comment on standards in particular programmes compared with standards elsewhere, they will have nothing to do with the assessment of individual students. They will, however, comment on the effectiveness of an institution's procedures for external examining and its application of the code of practice.

A matter of some concern in regard to the new quality assurance model, is whether external examiner reports will be made available to subject review teams. Universities feel that the system belongs to them, that the reports are designed for quality enhancement within fields within institutions and that this purpose would be compromised if the reports were used by the more judgemental reviews.

Degree awarding powers

The QAA advises the Department for Education and Employment on the merits of applications from institutions aspiring to degree awarding status. In the two years to February 1998 four applications were received and three were approved. There is a set of criteria used in the process, including the maintenance of academic standards.

Following the Dearing report the QAA has been asked to make a critical review of the procedures associated with the grant of degree awarding powers and the use of university title.

Collaborative operations and international dimensions

The QAA has drawn attention to recent developments whereby some universities franchise programmes of study to other institutions at home and abroad; some validate programmes designed and offered by other institutions or by industrial and commercial companies; some license or accredit other institutions to offer programmes in their name and some offer distance education with tutorial support provided by others. In the light of these developments, says the Agency, there is a need for public assurance 'that each institution maintains its degree standards, no matter how, by whom or where programmes leading to those degrees are offered.'

An example cited of good practice is The University of Greenwich (not to be confused with Greenwich University), which franchises its own courses to one or more partner Colleges, and 'cross-moderates' the outcome standards achieved. Relevant subject staff from the University and all the collaborating institutions, and also the external examiner(s) for the programme, meet together for the day and look at samples of marked assignments from the different institutions so as to ensure commonality of approach and equivalence of standard—and also to share good practice.

There is a keen awareness in UK that higher education is an international exercise, as well as a national one. About six per cent of full-time students are from overseas and constitute a growing market for providers. Universities also operate extensively off-shore. Concern has been expressed in South-East Asia, which is a large and longstanding market, about the quality and standards of off-shore awards. There are calls for an objective means of assurance that degrees and other awards are comparable with awards in the UK.

In addition to reviewing UK institutions' off-shore operations the QAA is developing a strategy to monitor events overseas which may have relevance for its functions in the UK. In particular it will work to support an overseas audit, to learn from overseas experience, to keep a watching brief on

international developments that may have implications for UK universities, and to brief international visitors.

The practice of overseas audits was initiated by HEQC in 1996 and is continued by the QAA which regards review of off-shore operations as part of its normal audit activities. These scrutinise, country by country, how higher education institutions assure the quality and standards of programmes which lead to one of their awards. Not infrequently the arrangement involves sub-contracting by a university to an overseas college or provider. This provider may design and deliver courses which the UK university approves as acceptable for the granting of its own award. Because of its expertise and reputation the QAA and its staff are in demand internationally as a source of advice and services.

QAA has reported on collaborative and international education and has published a code of practice for the assurance of academic quality and standards in higher education. This code, which is one of a suite of documents for quality assurance, is concerned with collaborative or partnership arrangements entered into by higher education institutions with other providers, in both the UK and overseas. It relates to the provision of programmes of study and the granting of awards and qualifications.

In view of 'out-sourcing' arrangements which seem to be developing between Australian universities (for example Northern Territory University, *The Australian* 13 July 1999) for selling and buying courses it is of interest to see examples of UK practice.

Summary and assessment

The UK has a system for independent quality assurance of higher education which has government at arm's length and is conducted on behalf of the statutory funding councils by an agency with a substantial university representation. It is complex and costly, but effective. It is widely criticised in the academic community for various aspects of its implementation, but there is almost universal acceptance of the principle of an external and independent agency with the authority to investigate systematically quality assurance at the institution level and processes and outcomes at the level of subjects.

The scheme has raised the visibility and status of teaching. It has made substantial contributions to maintaining and raising the quality of curriculum preparation, to staff development, to the pedagogy of learning and to the assessment of students' progress. It has caused universities to attend to their programme specifications and subject departments to be clear about their educational objectives. It contributes to the understanding by outsiders of the

UK system. The external examiner scheme is widely valued but it is conceded that reforms (of the sort envisaged by the QAA) are necessary. As a result of institutional audits and subject reviews there is far more descriptive and evaluative information in the public domain about universities and their programmes. Although there are no criterion-referenced minimal intellectual standards for degrees, the existence of the agency implants the idea that there is a watchdog guarding standards of awards. This is a matter of increasing significance as franchising and off-shore operations increase. It is universally acknowledged that there is a need to protect the reputation of UK universities by monitoring off-shore operations.

The QAA has responsibility for the government's accountability requirements, and it publishes information which is of use to students, employers and universities themselves. Directly and indirectly it stimulates national debate over matters of central significance to universities in a period of change.

Although they grumble about the demands made on resources and time, Vice-Chancellors and Principals are liable to admit privately that the quality interventions have given their institutions a needed shakeup; and that its reports are a useful weapon in their management strategies.

The QAA has operated mainly through cycles of audits at institutional level, and of reviews of teaching and learning at subject or department level. It publishes codes of practice in areas of significance, for example distance education, postgraduate research programmes, external examiners and collaborative provision. It has responsibility for the National Qualifications Framework (NQF). Its brief extends to collaborative arrangements universities may have with other providers and to delivery of courses overseas. It has been given responsibility for administering the legislation which regulates the recognition of new universities. There are major projects in hand on benchmarking and the external examiner system.

In the last year the Agency has been developing and trialling a new model for quality assurance which it is hoped will be less intrusive and less demanding on institutions and departments. Institutional audits and departmental reviews will be integrated and reference will be made to benchmark statements, the qualifications framework and external examiner reports. Assessments of six dimensions of teaching and learning, each rated on a four-point scale, are likely to be abandoned. More attention will be paid to the standards of awards, including exploration of the idea of a threshold standard within fields across institutions, and perhaps across fields. There will be some integration of reviews at institution and subject levels and evidence from the institution's own quality assurance procedures will be used more so as to lighten the burden of external scrutiny.

Where institutional audits give the reviewers confidence in the quality management process, there will be less emphasis on reviews at the subject level. The nomenclature and standards of postgraduate awards are to receive greater attention.

The auditing of overseas collaborative partnerships will continue to have a high priority, it being recognised that positive recognition from foreign governments helps give the UK a competitive edge in the international market for students.

The main criticisms of the QAA are its cost and the costs to universities (amount of documentation required for reviews, demands on staff time that could be devoted to teaching), to its size, and to unintended consequences of its interventions. At a deeper level there are concerns at infringement of the autonomy of universities although it is generally conceded that as universities consume a substantial share of the national resource, the government and the public are entitled to expect value for money. Some of the QAA's published and more critical judgments of departments have had exaggerated negative consequences, and not all weaknesses that are identified are attended to.

A forthcoming visitation from the QAA causes intense preparation by the department and university; among academic staff there is some apprehension, even fear. The quantitative summations of reviews have been seized on by the press to construct league tables of universities and departments which invite conclusions that are seriously misleading and potentially damaging.

In summary criticisms of the QAA made by universities and staff refer to:

- excessive costs of running the scheme;
- excessive costs to universities in preparing for visits;
- excessive 'bureaucracy' and a failure to discard old methods of quality assessments as new ones are introduced;
- unintended negative consequences such as misleading league tables, and excessive damage caused by mildly critical reports;
- failure to follow up identified weaknesses with remedial action;
- The numerical grading system without any moderation for variations between teams inevitably leads to inconsistencies of gradings made in subject reviews;
- correlations between good grades and resources characterised results in early rounds of subject reviews when former polytechnics did poorly; and
- among former polytechnics there is the belief that the values by which the QAA operates are '40 years out of date' and that mission statements stressing access, service to the local community and preparation for the world of work are not taken seriously.

Despite the prevalence of these sorts of criticism, many of which can be dealt with readily enough, the overall evaluation of the effectiveness of the scheme by informed critics is positive. It has led to assurance arrangements that are rugged, robust and transparent (Alderman); and to an extraordinary focus of attention by university teachers on the needs of students and the processes of teaching and learning. It remains to be seen whether the costs in money and time are excessive; and whether institutional autonomy has been compromised.

The principle of an external and independent assurance of university quality is accepted by most academics and universities. It is also acknowledged that the exercise has contributed significantly to raising the status of teaching and learning, to staff development and better practices and, through these, to gains for students.

Even if a scheme as costly and complex had any appeal, the UK model could not readily be adapted to Australian needs. For one thing there is not the experience of many years of a working association between government and universities which has helped to achieve universal compliance with the quality regime. Nor is there a tradition of external examiners or, in the former CAE sector, any equivalent of the CNAA which closely checked the standards of polytechnic awards. Of significance also is the continued existence in the UK of a buffer between universities and government, at the present time, in the form of the funding councils.

There are however some particular aspects of the UK model which could be usefully modified for any new quality initiative in Australia.

- Reviews of departments, now carried out by many Australian universities, could be informed by the careful methodology developed in the UK (which itself was influenced by the honours standards reviews carried out some years ago by AVCC).
- The UK code of practice for use of external examiners would be useful to those universities which use external examiners for honours theses, or if the system in Australia were to be extended, for example to all final honours examinations. Reports from external examiners could also become part of the documentation for departmental reviews.
- The UK benchmarking exercise is unfortunately named, but it is a staff development exercise for academic subject and discipline associations to articulate and make explicit the standards that are expected at critical levels for pass, honours etc. An earlier UK project on 'graduateness' echoes Australian work by Candy et al. and would be useful in current work on the generic intellectual qualities that should characterise graduates.

- The UK institutional audits owe something to the CQAHE ‘Wilson’ exercise in Australia. If the idea is revisited it could be informed by the UK experience of integrating the components of quality assurance.
- The recent adoption in the UK of a National Qualifications Framework includes definitions for postgraduate awards, which were proliferating, with nomenclature not matching the depth or duration of courses. A similar situation is developing in Australia.
- The terms ‘university’ and ‘degree’ are protected and the government has asked the QAA to administer the law in relation to would-be new players and to private or other non-university providers. As far as we know only universities can award degrees. Other providers must enter into an arrangement with a university if they wish to teach a degree level course. Such arrangements and ‘franchising’ by universities of their courses to other agencies are reviewed by the QAA according to a code of practice. In Australia MCEETYA could be asked to consider requiring all new applications by non-university providers to make an arrangement with a university for the awarding of its degree; and to move to the same requirement for existing providers as each comes up for review.
- Finally, it appears that collaborative arrangements with professional accrediting bodies are emerging in UK. The professions in Australia engage extensively in departmental and faculty reviews in connection with judging ‘minimum competence of graduates before admission to practice’. If academic audit is re-introduced there would be advantage in collaboration to avoid unnecessary duplication.

6.4 The Vocational Education and Training model in Australia

The accreditation arrangements in the Vocational Education and Training (VET) sector, also referred to as recognition arrangements, are not based on a detailed programmatic accreditation process but instead focus on the registration of training providers capable of delivering training services which meet defined quality criteria (similar in principle to institutional accreditation). These quality criteria include that the providers have the infrastructure and/or capacity to deliver and in some cases develop programmes or services. Registered training organisations may include Technical and Further Education (TAFE) institutions, agencies assessing applicants’ existing competencies acquired informally (recognition of prior learning), Group Training Companies, industry organisations, and work places. Once registered, the qualifications issued by providers will be mutually recognised by other registered providers.

A series of quality 'checkpoints' is established at the various stages of the training process and applies to the following: competency standards (outcomes which students are assessed against and which are developed by State/Territory training authorities and Australian National Training Authority (ANTA)), assessment guidelines, the registration process, organisations that develop and deliver training programmes, skill recognition services, training programmes and apprenticeships and traineeships.

An audit process, which is overseen by State and Territory training authorities and industry representatives is to be put in place to ensure registered training organisations are delivering products and services of an adequate standard, presumably at each of these checkpoints, though that is unclear. In addition, registered training organisations are expected to undertake quality checks on themselves.

In recent years VET has been opened to private providers but TAFE colleges remain the principal providers of vocational and education training in the Australian tertiary sector. Unlike universities, the TAFE system is funded mainly by State and Territory governments; and within each State and Territory the system and curriculum is centrally controlled with individual colleges having only limited autonomy. Major reforms made in the last decade have resulted in significant agreements between State and Federal governments regarding a common qualifications framework (including higher education), registration of the VET provider and the common definition of fields of study and curriculum content.

These new arrangements are designed for the efficient delivery of high quality education and training. The main features of quality assurance in VET include a very detailed focus on arrangements which assure the quality of providers or Registered Training Organisations (RTOs) and the specification of curriculum content and the competencies that will have been acquired by individuals earning a particular qualification. There is also a strong role for external agencies, particularly employer representatives, who have both formative and validatory roles, in the development of course units, which in VET are referred to as 'training packages'.

Quality is heavily dependent on these 'front-end' arrangements, the assumption being that the curriculum content and competency outcomes have all been set out in such detail that capable and well equipped RTOs will inevitably produce the specified product. The approach is driven more by a Taylorist perspective and industry's requirements than it is by modern educational theory and practice. For example the reference point for quality assurance is 'industry standards' rather than 'students' learning'; and where the term 'client' is used this refers not to students but to industries.

With respect to quality assurance arrangements within organisations, RTOs are expected continually to assess and evaluate themselves and they can expect to be audited once in every registration cycle (of three years) by their registering authority. As in universities, there is no independent check on examination standards in fields of training or in organisations. Within organisations there will be arrangements for reviewing teaching and assessment methods, and for appeals by students. We are informed that the use of 'external examiners' is not uncommon in TAFE.

It must be noted that the structure is not static; for example, the idea of self-accrediting institutions is gaining some momentum. The approvals required for teaching packages may not apply where TAFE institutions exist within a university (as at RMIT or Swinburne) or where an institution contracts to teach a course in association with a university.

Australian Recognition Framework for Vocational Education and Training

Under the Australian Qualifications Framework, there are six vocational education and training qualifications: Certificates I to IV, Diploma and Advanced Diploma.

The following account of accreditation and quality assurance in the VET sector is based on information obtained from the ANTA's web page and from discussions with senior TAFE officers in several States and Territories. In effect accreditation applies to both the organisations which provide the training and the courses they teach, the latter being called 'training packages'. The method is very different from anything in the higher education sector and, in order to convey the flavour of this approach to accreditation, the arrangements for registering institutions are described in some detail in the following few pages.

The Australian Recognition Framework (ARF) is a new approach to registering organisations that deliver training, assess people and issue qualifications. It has been developed by ANTA under the authority of MCEETYA. Its main features are that it creates a national registration process for training/assessment organisations with an emphasis on quality. RTOs are able to operate nationally, and have their qualifications/statements of attainment recognised nationally, and by all other RTOs.

The new framework replaces State and Territory based accreditation of courses with a more flexible, client-focused approach based on training packages. It allows for assessment-only organisations and partnerships, as a means of providing a bigger range of options for clients. It also allows further self managed recognition for 'quality endorsed' RTOs.

The national registration process for training/assessment organisations began operations on 1 January 1998. From that date all training organisations (including TAFE institutes) that issue Australian Qualifications Framework qualifications and statements of attainment must be registered by a State or Territory training authority; and all registered training organisations (RTOs) can issue nationally recognised qualifications and statements of attainment.

Organisations are registered to provide:

- training and assessment products and services or assessment products and services only
- products and services that are based on training packages and/or other products and services for a general area of vocational education and training if there are no relevant training packages for that area; and
- products and services up to a specified qualification level.

To become registered an organisation must operate in accordance with the national principles, standards and protocols that make up the Australian Recognition Framework. The aim of the framework is to ensure that RTOs provide high quality products and services that meet the needs of their clients.

The core standards require RTOs to follow national principles for registration and mutual recognition; follow all relevant law; have a commitment to access and equity; demonstrate a focus on quality; agree to external monitoring and audit; have sound financial, administrative and client/learner records management systems; and engage in ethical marketing and advertising.

Standards for the delivery of training products and services require the RTO to have the resources needed to meet the requirements of the training packages or accredited courses they deliver; to be able to identify the learning needs of diverse types of clients and provide for them; to provide support services for clients; and to be able to conduct assessments and issue qualifications and statements of attainment.

Standards for assessment-only RTOs require the RTO to be assessed; to provide support services for clients; and to be able to issue qualifications and statements of attainment.

The protocols cover compliance audits and strategic evaluations, ethical marketing and registration fees.

The registration process makes public and private providers subject to the same requirements. Once registered, RTOs must continually assess and evaluate themselves. They will also be audited at least once during each registration cycle by the State or Territory training authority that registered them, usually with industry participation. Other State and Territory training

authorities might also be involved in monitoring and auditing, if the RTO operates in more than one State or Territory.

The registration of a training organisation by one State and Territory training authority will be recognised by all other States nationally and can operate throughout Australia (within the scope of its original registration) without being further registered, and without paying extra fees. The authority that first recognises them is called the primary recognition authority.

Qualifications and statements of attainment awarded by an RTO (whether public or private) are issued under the authority of the primary recognition authority and are recognised nationally. That is, qualifications and statements of attainment awarded by one RTO will be recognised by another, without the need for further assessment.

Training packages endorsed by the National Training Framework Committee (and courses accredited by a State or Territory training authority) can be delivered by all RTOs, as long as they are registered to do so.

Traditionally, governments have regulated training by accrediting courses. This approach has raised concerns about the content and delivery of training not meeting client needs, and about long lead times between training needs being identified and courses being provided.

Training packages aim to address these concerns by providing basic building blocks that can be used by RTOs to build training. Packages contain industry competency standards, related qualifications, assessment guidelines and learning and assessment resources.

Training packages are progressively replacing the current mix of competency standards and accredited courses. However, the use of accredited courses (and the accreditation of new courses) will continue where there are no Training Packages.

As in the past, courses can be put forward for accreditation (in areas where there are no training packages) to the State or Territory training authority. A qualification will be determined and recognised by all RTOs nationally.

Registered training organisations might be anything from a small organisation doing on the job assessments, to a large training and assessment organisation operating nationally and providing a range of training package qualifications. Many enterprises have successfully become RTOs, thereby giving them control of their training and the ability to issue national qualifications.

Enterprises which choose not to register as RTOs but want a formal relationship with an RTO can form a partnership with an RTO. In this way, enterprises can have their internal training and assessment recognised by an RTO

that is responsible for training and assessment quality assurance, and which issues the qualification or statement of attainment.

RTOs can become 'quality endorsed' by meeting the national standards for registration as a training organisation quality-endorsed to self-manage training recognition. A key requirement of self-managing status is that the RTO meets the quality system requirements of its primary recognition authority.

A quality-endorsed RTO can be authorised by its primary recognition authority to: expand its scope of registration and /or accredit its own courses where training packages have not been developed. This is regarded as a major delegation of the powers of State and Territory training authorities.

Summary and assessment

Basically, the VET model is a system of accreditation of providers, whether public or private. The expectation is that properly accredited providers will provide an acceptable standard of training and will regularly review themselves. That is the current situation with universities, and is thought by some to be inadequate; there is no reason to believe that it will produce better outcomes in VET.

VET providers, furthermore, appear to have less scope for initiative and less flexibility than universities currently have. As training packages are developed, VET providers are expected to use these as 'building blocks' for their programmes; this ensures control of content but severely limits the autonomy of the teacher. Within TAFE in particular the institutions have less freedom of movement and are subject to more central control of curriculum than universities. A comparable move in the university sector would be damaging at a time when universities are being urged to be entrepreneurial, to exercise initiative and flexibility, and to foster diversity rather than uniformity. It is unlikely to be at all acceptable to universities and appears to contradict all government higher education policy of the past twelve years or more.

The main outcomes measures in VET—the statements of competencies—are also unlikely to be acceptable to universities. They are highly detailed and somewhat mechanical in their expectations of particular functions that the qualified person should be able to perform. It is not easy to see how they could be usefully applied to students of (for instance) mathematics, engineering or economics without limiting their scope for imaginative and lateral thinking. The competencies that could be so specified and expected are ones that by and large would be taken for granted in a higher education graduate in the relevant field. The statements of attributes of graduates, quoted above, are more generic and qualitative and thus more flexible than most statements of competencies in the VET sector. They are also more

demanding, and this is recognised in the statements on university graduates in the AQF, namely:

Characteristics of learning outcomes at this level include:

- the acquisition of a systematic and coherent body of knowledge, the underlying principles and concepts, and the associated problem-solving techniques;
- development of the academic skills and attitudes necessary to comprehend and evaluate new information, concepts and evidence from a range of sources; and
- development of the ability to review, consolidate, extend and apply the knowledge and techniques learnt.

A course leading to this qualification also usually involves major studies in which significant literature is available. Course content is taken to a significant depth and progressively developed to a high level which provides a basis for postgraduate study.

The strength of the approach to quality assurance in the VET system is seen to lie in the national consistency and portability of qualifications, making their value less dependent on the reputation of the awarding institution.

The principal weakness is that the registration processes are not sufficient in themselves to guarantee quality outcomes. Training packages do not include a full curriculum statement—though many have been mapped across from old curriculum statements—but rather a listing of competencies and assessment guidelines. There is no check on teaching content, nor that graduates actually have the competencies to the required standard. ANTA has, however, recently appointed a national working party on the quality of training outcomes.

The intention to audit each RTO during its three-year registration cycle is designed to fill a definite gap in the present quality assurance arrangements. Given that the number of RTOs and would-be RTOs is likely to be in the thousands, this is an ambitious aim if the audit is to be conducted at depth and in detail.

In terms of the criteria set out in the project brief, the VET system of quality assurance would rate as a highly regulated and prescribed one. This shows up in the central design of courses, the consistent and determining role of industry and the professions in course accreditation, the strong hand of government and government agencies in the quality assurance framework—although there is provision for earned self-accreditation, and the extent of regulation is seen as the price to be paid for achieving national consistency and mutual recognition. While designed to promote and enhance quality improvement, the system is seen presently to be putting a higher premium on standardisation than on innovation and enhancement.

The system has incurred high initial costs in the development phase, and further substantial costs will arise if the planned institutional audits are conducted with an appropriate degree of thoroughness.

The system's principal focus is on processes rather than standards. Standards are not addressed in any direct sense, and cannot really be inferred from the existence of competency statements and assessment guidelines. This is a limitation shared by quality assurance practices in higher education as well.

The face credibility of the VET system of quality assurance is enhanced by the uniformity in its application to both public and private sector institutions, and by the extent to which it is client-centred. Its credibility in broader terms will be influenced by the strength of the proposed audit programme and by what is done to evaluate training outcomes.

6.5 Accreditation in the United States

In the United States the main agencies for ensuring the standards of higher education are the various accrediting agencies, but both the federal government and the state governments also have important roles. The federal government does not have direct responsibility for the control of higher education, but it provides the bulk of research funding and has major programmes of student assistance; through its power to withhold these funds it can exert considerable pressure on universities. For instance, it will not provide such funds except to duly accredited universities; it requires that they publish reports on their performance in areas of concern to the government; and it now regulates the accrediting agencies themselves, specifying factors which such agencies are expected to take into account when accrediting. Since state governments directly fund public universities, they can exercise even more control and direction of universities within each state, requiring prescribed levels of performance and outcomes.

Some of the accrediting agencies date from before the Second World War. They were established to facilitate movement of students between comparable universities by establishing standards for admission of students and transferability of credits when students moved from one university to another. These agencies were set up by the universities themselves and participation in their work is voluntary on the universities' part; however there could be serious disadvantage for an institution not accredited by a recognised agency.

There are six regional associations covering various regions of the USA and between them covering the whole nation. They have no legal control over universities or courses, but promote standards of quality and criteria of excellence. Universities and colleges which meet these standards are admitted to membership of the relevant association, which is their public

guarantee of quality. Only institutions with accreditation status may receive federal financial grants, and private foundations also usually confine their assistance to accredited institutions. The U.S. Secretary of Education has power to grant recognition to accrediting agencies, and has used this power to require agencies to include as criteria for accreditation outcomes such as test results, job placement rates and progression to graduate or professional study by students.

The accreditation process compares institutional performance against standards set by the agency, taking account of the purposes of each institution. The agency, through a team which it nominates, considers the educational programmes of the institution and the resources available to implement the programme: funding, staff levels, equipment, library, facilities and services. It considers also the institution's admission standards, and is moving towards considering internal processes of quality assurance, and student retention and completion rates. Each agency publishes a list of the institutions which meet its standards, and every 5 to 10 years revisits each institution to see whether it should maintain its accredited status.

In 1996 the universities and colleges set up the Council for Higher Education Accreditation (CHEA) which in effect accredits the accrediting agencies, certifying to their standards and processes. It also serves as a clearing house for information on accreditation, as a policy centre and a national advocate for accreditation and quality assurance and improvement. It coordinates research in its field, collects and disseminates data and facilitates communication and exchange of information between the agencies and the sector; it can also act as a mediator in disputes over accreditation.

Assessment of the US model

One great strength of the American model is that each agency is set up and owned by the institutions themselves, so that it is readily accepted. While participation in an agency is voluntary, an institution would seem foolhardy to decline to participate; strong institutions have nothing to fear, and weaker ones can only be helped by the recognition and status that accreditation brings. Each regional agency is well placed to assess the health of higher education in its region and to act as an advocate to government and other funding sources. They can also serve as a counterweight to governments, especially state governments, if these seem to be imposing unreasonable or undesirable requirements on their universities and colleges.

A possible weakness of this model is that accreditation could be based on a minimum standard which could be quite low. This seems to be obviated by the mission, common to all agencies, to raise standards, although the

standards referred to in this context refer more to the quality of academic inputs than of academic outputs, including the intellectual standards achieved by graduates. The establishment of the Council for Higher Education Accreditation is another device to ensure that the accrediting agencies act in a positive and proactive manner.

6.6 Quality assurance in Sweden

Quality assurance in the Swedish higher education system is the responsibility of the statutory National Agency for Higher Education (NAHE). There are three main components to the work of the agency:

- accreditation of institutions and courses;
- quality audits of individual institutions; and
- national evaluations of subject areas.

Accreditation

The right to award degrees is controlled by the State, in this case the NAHE. The Agency may consult with various professional bodies, but the decision is the Government's. In certain cases, e.g. doctors and nurses, the degree in itself does not give the right to practise a profession; this is given by another state agency (the National Board of Health Care). In other cases, e.g. teachers, the degree legitimates the holder to work as a professional. Such 'professional degrees' have special terms of accreditation.

All institutions with university status are free to award any degree in any field they may wish, including Ph.Ds. Other institutions, created by the 1977 Higher Education Act, have a general approval to award bachelors' degrees but not higher degrees. All new institutions (except those granted 'university status') have to apply for the right to award degrees in each discipline. An evaluation may result in the right to confer degrees in e.g. sociology but not in psychology. If an application is turned down, it cannot be resubmitted before twelve months have passed. There is a recent example of the right to award degrees in a particular field (economics in this case) being withdrawn from a university on quality grounds.

Accreditation assessments in a particular field may be conducted simultaneously across a range of providers or would-be providers. For example, the Government recently requested an evaluation of applications from ten private providers to offer courses in psychotherapy. Using a common set of quality criteria, the expert panel appointed by the agency recommended the rejection of all ten applications. Two were allowed to resubmit after six months, the remainder not before twelve months.

Quality audits of individual institutions

The focus of audits is on the institution's efforts to assure and improve quality; audits do not deal with quality per se. Strong emphasis is placed on the assessment of leadership at all levels, with little normally being said directly about teaching and learning.

The concept of 'excellence in higher education institutions' is a frame of reference for institutions and audit teams. It describes the self-regulating institution in which everybody is involved in the development of quality processes and in which there is an overall long-term strategy for quality enhancement. Other characteristics include focus on the student, gender equality and diversity, incisive leadership and an international perspective.

Systematic quality enhancement is expected to involve a structure which includes goals, activities to reach the goals, results and evaluation. Goals and activities should be expressed in a quality enhancement programme, a document required by the government. The task of the audit team is to ascertain to what degree the policy of the institution permeates the institution as a whole.

The first round of audits, conducted between 1995 and 1998, demonstrated that there is room for development of quality enhancement processes at several institutions, but that current ideas on quality and quality enhancement are now becoming integrated into the work of institutions.

A second round of quality audits of all higher education institutions will be conducted between 1998 and 2002, aiming at contributing to continued improvement and renewal. The audit process is essentially the same as in the first round, and the theme is still evaluation for improvement. However, the procedure has been slightly modified on the basis of the experiences of quality enhancement and assurance in institutions and of the first round of audits.

The audit team, appointed by the NAHE, normally consists of a chairperson and one or two other high-ranking academics, one representative of society at large and one student. The audit process begins with a self-evaluation by the institution. The self-evaluation, which is the most important part of the process, describes and analyses the quality processes and their results. It should take into account the results of the previous audit. The audit team examines this document and other relevant material, and then visits the institution to try to verify the statements made. A report is published which is intended to function both as a point of departure for the further work of the institution and for information to interested parties.

National evaluations

In principle national evaluations of subject areas may be ordered by the Government, or initiated by the NAHE. Unlike audits, evaluations do look in detail at academic processes, including curriculum and teaching methodology.

Recent examples are a government-initiated review of study programmes in Architecture and an agency-initiated review of medical education. In each case, recommendations were made *inter alia* for improvements in the quality of the education provided. The Agency will conduct follow-up assessments of the responses made by the institutions concerned.

According to our sources, interest in quality (of education, more than research) has increased as a result of the above quality assurance arrangements. Universities have increasingly come to accept that they live in a competitive world, with government funding becoming less dependable and good students less ready to hand. Vice-chancellors in the main welcome National Agency 'inspections' for the stimulus they give to achieving strategic change within institutions.

7 A Modern Australian Model

We have concluded that none of the models assessed in the previous chapter adequately meets the needs and criteria set out for the project. In summary:

- The current Australian model which leaves matters entirely to each self-accrediting institution, has the virtue of cheapness and zero violation of institutional autonomy. It fails, however, to give any satisfactory answer to our opening questions: 'How can anyone know how good a university's degrees are? How do universities themselves know?' Furthermore, in the current highly competitive climate, it does little to protect our international reputation in respect of the quality of our educational processes or of our standards.
- The current NZ model comes closest, although up to now it has focussed much more on processes than on outcomes or standards. It has the advantage of being at arm's length from government, having been established by the universities in conformity with the *1989 Education Act*, but operating with complete independence. It needs to be noted however, that NZ has a single unitary system of government. The situation is more complicated in Australia where there are nine governments with interests and responsibilities in higher education. In the matter of accreditation all but one Australian university operate under legislation of State or Territory governments.
- The UK system is effective in advancing the status and standards of teaching and learning. It includes numerous components which are valuable in themselves, and which we will be proposing for inclusion in an Australian system. It is however excessively expensive, intrusive and bureaucratic.
- The Australian system for VET is designed for a tradition of teaching and learning which is different to university traditions: it assumes a body of knowledge which can be specified in detail and packaged for transmission to students. The model lacks any conception of intellectual standards or focus on outcomes.

A model is needed which builds on current and recent practice, which embraces both quality assurance and accreditation. It must accommodate not just the existing self-accrediting universities, but institutions aspiring to university status, whether public or private. It must also be appropriate for non-university providers of courses, some of which award their own degrees, others which prepare students for the awards of existing universities. It must be relevant to those providing in novel ways, such as corporate providers and 'virtual' (computer-based) providers.

Its purpose would be to ensure, for the institutions themselves, for the Australian Government and the general public, and for students that degrees are all of a sound standard in which the Australian people may have confidence and pride. Its methods would include audits of institutions' quality practices and for this purpose an independent agency would be needed.

7.1 Self-assessment and audit

The central quality activity of the agency would be an audit of institutions based on a detailed self-assessment, including benchmarks of standards. By audit we mean an independent check on an institution's quality assurance. The process assumes that institutions have appropriate quality assurance policies and procedures in place and that convincing evidence can be produced that these are working to good effect. The audit checks the extent to which this is the case, and that the methods used by institutions are sufficiently reliable and rigorous to assure stakeholders of quality and standards.

This assessment would be audited on a whole-of-institution basis over a five year cycle. On this basis the agency would undertake eight to ten audits each year. The audit team would be made up of distinguished academics plus some representation of the wider community; the purpose is to assist the institution to fulfil its aims, it is not a punitive exercise. Should the audit reveal serious areas of weakness, the institution would be given a reasonable period to address such matters. Failure to rectify serious deficiencies could result in removal of the institution from the AQF list of accredited institutions, or financial penalties.

Higher education institutions now make annual submissions to DETYA in the Profiles context on their Quality Assurance and Improvement Plans for the forthcoming triennium. These plans outline the institution's goals, strategies for achieving those goals and the indicators used to monitor progress in achieving those goals. These plans should be made available to the agency to assist in the audit process.

It is not proposed here that there be any direct review by the quality body of subject areas or departments within institutions as there is in UK. But an important activity of the audit will be to scrutinise ways in which institutions ensure that there is a high standard of teaching and learning in specific subjects or disciplines at department or faculty level.

Reviews of faculties, schools or departments are now standard practice in nearly all universities. They are usually conducted by panels which include external representation and cover such matters as curriculum, methods of

teaching and assessment, student achievement, student support and guidance and learning resources. In line with trends in quality assurance these reviews should give particular weight to degree standards and graduate outcomes. The reports of these reviews and the follow up action taken on them within the university would be of major interest to the agency. Copies of the reports of these reviews should be supplied to the agency to assist it in its preparations for audits and in its general oversight of quality practices in the sector.

To summarise: the evidence from the institution to be examined by the audit team would include:

- an analytic account prepared in advance of arrangements that it has to assure the quality of its academic provision and the standards of its academic awards;
- other documents, including quality improvement plans, to demonstrate how it satisfies itself that its policies, strategies and processes for these matters are being effectively applied;
- reports from subject/department reviews and professional accreditation;
- evidence of the academic standards of awards and detail of any internal or external benchmark and moderation processes; and
- interviews with the Vice-Chancellor and the senior management team; members of central committees, heads of departments and chairs of boards of studies, representatives of staff and students.

The report of the audit should refer to the institution's quality strategy, the academic standards of programmes and awards and arrangements for teaching and learning. After opportunity for comment, the report should be published and available to the public.

Participation in periodic quality audits and adequate response to any negative reports should be a condition of Commonwealth funding. Furthermore, failure to do so should result in removal from the list of quality approved institutions.

7.2 Accreditation

Quality assurance and accreditation are linked, in that authorities would wish to accredit only institutions of good quality. However, the meaning of the words and the processes involved are different. Accreditation is the process whereby an authority, recognised by institutions and government, determines that an institution offering courses in higher education may become self-accrediting, or offer its own higher education awards subject to periodic review. An accreditation agency certifies that the standards of a

course are appropriate for the award to which it leads; and that the methods are appropriate for the purpose.

The objective of accreditation is to ensure that awards given in Australia are of a high standard intellectually and professionally. Australian institutions as a group currently enjoy a sound reputation; these measures are to ensure that that situation continues, we are not starting from scratch to build that reputation.

Accreditation depends on State or Commonwealth government laws and the protection of key terms including 'university' and 'degree'.

The classes of institution to be considered for accreditation comprise those aspiring to become self-accrediting universities and non-university institutions accredited by a State government to teach higher education courses and offer awards.

States' practices on accreditation in higher education have varied but we note that MCEETYA has established a Multilateral Joint Planning Committee in Higher Education with the task of reporting on a common approach to criteria and procedures for accreditation. The accreditation role for a national agency would be:

- for self-accrediting institutions—to maintain a list of those that are quality assured;
- for those aspiring to become universities—to work with the State agencies to ensure that common criteria and procedures are used in determining applications; and
- for institutions seeking accreditation or re-accreditation by the States to teach courses and offer awards—to liaise with State agencies in the interest of achieving common procedures and standards.

Aspirant private universities and other private providers would be subject to these procedures if they wished to use the term 'university' or to award titles that are protected. Compliance with the procedures should be a condition of the granting of any Commonwealth funds to such providers.

Where courses are offered off-shore by established self-accrediting Australian institutions these should come under the scrutiny of an accrediting or quality agency since the reputation of Australian institutions generally is at issue. This applies both to courses delivered off-shore in face-to-face mode and to those in distance or electronic mode.

We believe that accreditation should not be simply a technical decision, but rather a process leading, over a period of time, from non-accredited teaching activities to a fully fledged autonomous institution. In addition to meeting the

criteria for being an institution of higher education, the provider seeking self-accreditation might be well advised to accept the sponsorship and oversight of an established university for a substantial time. This is the way in which the Universities of New England, Newcastle, Wollongong and the Sunshine Coast, Flinders University and the Faculties of the Australian National University began and which provided them with strong guidelines for their ultimate autonomous development.

At the same time, this should not be used as an implement of conservatism frustrating new approaches. It need not and certainly should not have the effect of 'nothing ever being done for the first time'. There are now some remarkably adventurous and flexible universities in Australia which could act as sponsors sympathetic to novel approaches, even though the sponsor may not wish to adopt those approaches for itself. In the agreements between Deakin University and the Ford Motor Company, and more recently with Coles-Myer, we see the beginnings of the corporate university in Australia. Notre Dame University in Perth, a private provider, has a form of mentor in Notre Dame University, Indiana, USA. The Hotel Management School originally established by the Canberra Institute of Technology received such guidance from Cornell University, USA, and now is associated with RMIT. We believe that equally effective and sympathetic mentors for new ventures—public or private, traditional or radical—could be found amongst the existing Australian higher education institutions.

7.3 An agency for higher education accreditation and quality

Implementation of the quality strategy described above would require the creation of an independent agency. We have evaluated three possible arrangements for such an agency:

- 1 A private company comprising a representative of each university and a board of about 11 including government, university and student members (*AVCC Proposed Australian University Quality Assurance System*, 1999)
- 2 A private company established by MCEETYA members managed by a board of up to 5 with higher education, government and other members (*Office of Higher Education, Queensland*, 1999)
- 3 An authority reporting to the federal Minister comprising about 10 members including university, government, industry and student members.

In evaluating these possibilities we have used the set of criteria established for this project. Particular attention has been paid to the need for the body to serve the interests of Australian governments but, at the same time, to be at

arm's length from them and to respect the traditional academic autonomy of universities. An agency must be seen to be independent, expert and rigorous in maintaining and advancing the intellectual standards of Australian awards.

The AVCC arrangement for a private company comprising a member from each university could, we believe, be designed to satisfy six of the eight criteria. It would also preserve institutional autonomy and be independent of government. It could not, however, be readily adapted to work closely with the States in accrediting institutions seeking degree-awarding status.

Furthermore, in the longer run, this model is likely to encounter problems in retaining an image of independence and rigour. The former AVCC project for reviewing honours degrees was abandoned, in part because interested parties sought to become part of the review process. The UK has replaced a similar model with an agency constituted more independently, and New Zealand is in the process of a similar change.

The MCEETYA arrangement recognises the important fact that the large majority of Australian higher education institutions were created by Acts of State parliaments. But, just as the AVCC model would find the accreditation role politically difficult, the States model would have problems in convincing universities and the Commonwealth Government (which is the source of all public funding) that it should have an ongoing role in quality assurance.

We have concluded that, in order to meet the needs and criteria of this project, a new national agency is required. It would be established by the Commonwealth Minister for Education in consultation with MCEETYA and with the AVCC. It is essential that the agency have the confidence of the States and Territories, and of the institutions involved. It must also have the confidence and backing of the federal government. Hence its powers and its membership should be agreed between these parties. It should function as an independent body at arms length from government; to this end it could with advantage be located outside Canberra. The membership would have to include a full-time chair, and up to eight or nine part-time members drawn from academics of distinction; representatives of Commonwealth and State governments and members of the wider community with a serious interest in the quality of higher education. Membership should change from time to time, but terms should be long enough to enable members to acquire some expertise in the operations of the agency.

In addition to giving it independent status, there could be an advantage in giving the agency legal recognition as a statutory authority in that, if it carries out its prescribed duties in 'good faith' and in accord with its statutory functions it is protected from being sued, for example a disaffected student. Otherwise the agency may have to protect itself by a contract with institutions

which in effect says ‘we expect you to observe our standards of quality; but, in any event you undertake not to hold us liable for any damages...’ It is obviously undesirable that any such undertaking should be sought. The case for making the agency a statutory authority is probably stronger in connection with its role in dealing with overseas providers.²

This agency (we suggest that it be called the Council for Higher Education Quality and Standards, CHEQS) would work with the States and Territories to achieve and maintain a consistent national approach to the standards of Australian higher education and to the accreditation of new institutions. It would liaise with and advise other Commonwealth agencies, and they would refer to it all matters concerned with the legal recognition of higher education institutions. It would respond to international enquiries about the Australian system of higher education and the establishment of new institutions or courses outside self-accrediting institutions. It would work with the States and Territories to achieve uniform protection of the terms ‘university’ and ‘degree’, and any other terms which the governments find in need of protection for the achievement of accreditation objectives.

The present problems caused by some overseas providers of dubious reputation are just the beginning of what may well become an issue of major proportions. The Council will need to keep abreast of this rapidly developing phenomenon and advise on measures that will be necessary if Australia is to protect its reputation and high standards. Part of a long-term strategy may be establishing international agreements which provide a legal framework for accrediting courses offered by recognised providers. Internet degrees offered by other providers may prove impervious to regulation unless, perhaps, governments are willing to legislate along the lines recently adopted in laws relating to other Internet material.

We believe that international arrangements of some kind or other are an inevitable development and Australia will be in a much better position to contribute if it has its own house in order with respected arrangements for accreditation and assessment of quality. The services of an Australian agency of high repute may well be sought by other countries in the region.

In summary, this Council, in addition to its primary quality and accreditation responsibilities

- would have a primary role in relation to Commonwealth institutions (e.g. ANU, Australian Maritime College);

² Based on personal communication with Jack E Richardson. See also appendix C

- would be the point of reference for accreditation matters and advice generally among Commonwealth agencies;
- would liaise with State/Territory accreditation bodies;
- would represent Australia in international forums and disseminate information to overseas countries and bodies about accreditation practices and standards in Australia;
- would develop a detailed and expert knowledge and data base of accreditation practices and standards in overseas countries, and could advise the National Office for Overseas Skills Recognition (NOOSR) in that respect (though NOOSR would continue to deal with course-level issues and individual inquirers);
- would not seek to develop expertise in course accreditation as such; States and Territories would continue to deal with this but may be aided in their approach by knowledge of the Commonwealth Council's work in Australia; and
- could be invited to assure the quality of the practices of State/Territory accreditation bodies.

The Council should also have the authority and funds to initiate projects relevant to its functions. These could include exercises on external examiners, subject benchmarks³, production of codes of practice and possible roles for the professions in quality reviews. The priorities for project work should be guided by the Council's experience in conducting audits.

7.4 Outcomes and standards

The brief for this project emphasises the need to protect Australia's international reputation with respect to the quality of educational standards and 'the desirability of focussing (more than in the past) on outcomes and standards as well as process.' Indicators typically cited by universities when referring to course outcomes relate to the success of graduates in obtaining employment or in proceeding to further study or in getting professional registration. While these sorts of indicators are important for graduates themselves, they have more to do with the state of graduate labour markets and the professions than with the intellectual standards of degrees. It is important here to make a distinction between outcomes and standards, the

³ In this section we use the term benchmark to mean a statement of the explicit system-wide academic standards which apply within a field or discipline. Benchmarks usually refer to critical points of achievement such as the pass-fail line or the pass-honours line; but may also refer to 'the typical student'. Benchmark statements include the techniques and skills which are associated with developing understanding in the discipline; and the level of intellectual demand and challenge which is appropriate.

latter being the direct concern of universities. In order to 'measure' standards some form of criterion referencing is needed, together with comparisons with external benchmarks.

One approach to this is to use reports from external examiners who are familiar with standards within disciplines across institutions. In the UK and, to a lesser extent New Zealand, the external examiner is an important component of quality assurance. In Australia however external examiners at undergraduate level are only used occasionally for honours theses.

Another way of assessing the intellectual standards of degrees is to assess the evidence used to decide whether a student will be graduated or not; for example assessment of samples of final year examination scripts by external members of review panels (see Appendix A for some details of how this might be done).

Both external examiners and the assessors of samples of scripts would be aided in establishing the adequacy of standards in a particular discipline or field if they had access to benchmark descriptions of the sort being developed in UK. At the present time however neither external examining, independent assessment of samples of scripts or subject based benchmarks are much developed in Australia.

In devising a model which is non-prescriptive and which 'builds on the key features of the Australian higher education system' we have been able to approach the question of degree standards only indirectly through audits. Over time, audits could play a role in encouraging and assisting institutions to use external moderation practices of the kind referred to above.

Nevertheless, if the question 'how can anyone know how good a university's degrees are?' is to be answered with evidence that is reliable, valid and more immediate than that which comes from the five-year cycles of reviews, the

Council would need to initiate programmes for benchmarks of standards within subjects and disciplines, and for the independent assessment of samples of the evidence used in graduating students at pass and honours levels.

These programmes would have as their main focus academic disciplines; but the concept of generic intellectual skills and values could also receive attention. The ACER project on generic skills is not discipline based and is likely to be more useful in measuring change, or value added, than in measuring standards as such. Our suggestion is that assessing the intellectual standard of degrees is a question the Council might consider as one of its projects.

Throughout this report we have limited the discussion mainly to undergraduate courses and degrees. The principles we have developed apply equally to postgraduate courses and research degrees, and the proposals we develop are intended to embrace these levels as well as initial courses. Indeed the standards of some of the newer postgraduate courses are probably in need of scrutiny as much as any other area of teaching in higher education. Because external assessment is more or less universally practised in the case of research degrees there may not be the urgent need for action that exists with coursework degrees. Nevertheless there has never, to the best of our knowledge, been any investigation of the standards of research degrees, and the subject should be on the agenda. The fact of external assessment should make it a relatively simple matter to institute quality assurance measures.

Although we have not attempted to cost the model we expect that it would be comparable with the new arrangements in NZ, and much less expensive than the UK strategies.

The Council itself should be audited against its own self-assessment after three to five years.

8 Evaluation of the models against the brief's criteria

- **Credibility.** Independence and rigour in the processes for validating degree standards have been principal considerations in designing the Modern Australian Model (MAM). Of the other models, only the UK is credible in these respects. MAM is relatively simple and should be perceived by 'potential customers' as an effective and tough guarantor of high standards.
- **Effectiveness.** Of models one to four UK is the only one which includes some focus on direct measures of learning standards outcomes. MAM is potentially more explicit in this respect. Both the departmental reviews conducted by institutions themselves, and the degree standards validation processes and related discipline reviews to be managed by the Council (MAM) would include independent assessments of samples of final year examination scripts.
- **Legal clarity.** Australia has been fortunate in that, unlike other English-speaking countries, there have been few legal challenges based on the quality of teaching in universities. If the Council is a ministerial committee it could become liable unless it had an explicit agreement with each institution that they accepted full responsibility for the quality of teaching and services. If the Council was constituted as a statutory authority it is unlikely to be liable if it 'carried out its duties in good faith'.
- **Promoting good practice.** The UK arrangements place considerable emphasis on both summative and formative evaluations. The new NZ model also contains both elements. The VET model has no explicit formative elements except to the extent that external examiners provide feed-back, although the audit may turn out to be formative.
- **MAM has been designed to include both summative and formative evaluations but with greater emphasis on the latter.** This will be achieved principally by feedback to institutions of audit reports on self-evaluations, and by the outcomes of projects initiated by the Council. The accreditation function also has a strong formative element in that accreditation is not viewed merely as meeting the criteria on a list for being an institution of higher education, but as a process which includes feedback on performance from the agency and from a sponsoring university if one is involved.

- **Building in key features of the Australian system.** The accreditation function recognises that all existing universities are self-accrediting institutions. The process for accrediting new players is viewed as a partnership with State and Territory governments under whose legislation all universities (except ANU) are established; and whose legislation will accommodate newcomers. The quality functions of the Council in MAM recognise institutional autonomy. It builds on the extensive existing practice whereby universities review their faculties or departments over a cycle of five to ten years.
- **None of models one to four makes any particular use of accreditation of courses by the professions.** In principle in the MAM the Council, in exercising its quality function, would take account of professional accreditation. It needs to be noted however that the nature and thoroughness of professional reviews varies greatly. A few report that they look at outcomes; others like Law have so far merely been concerned that the curriculum includes specified components. There is a case for reviewing the accrediting role and functions undertaken by professional organisations. The potential for linking professional reviews and university departmental reviews should be investigated. Overall the criterion used by professions in evaluating university courses is the minimum competence needed by graduates before they can be admitted to practice. This is not an unreasonable standard for the professions; in institutions, however, there should be as great a concern with achieving honours standards as there is with the minimum needed to pass.
- **Minimum prescription and bureaucracy.** The VET model scores highest on a scale of bureaucratic intervention; the NZ and UK models appear not to be excessively interventionist or prescriptive. The proposed new NZ model allows institutions to choose their own audit agency, requiring only that it be approved by the statutory quality agency. MAM would require only a small number of core officers in the Council, most of the work being outsourced and undertaken by panels of assessors. The only 'prescriptions' in the quality function would be the requirement that institutions passed on to the Council reports of their departmental reviews and that they made institutional self-evaluations and submitted these to audit. Should the Council take up our suggestions for the direct validation of standards, universities would need to retain samples of the evidence on which decisions to graduate students were made.
- **Cost.** Detailed calculations have yet to be made. It is clear however that the cost of MAM would be substantially less, *pro rata*, than the UK model and comparable with the NZ one.

8.1 Additional criteria applying to MAM

Rigorous scrutiny of the financial and quality aspects of proposed institutions should apply before founding legislation is passed or other authorisation is given. This requirement would be built into the accreditation process and carried out by expert panels appointed by States/Territories for the purpose.

The annual publication of Quality Assurance and Improvement plans for the forthcoming triennium would be scrutinised by the Council in preparation for institutional audits. The Council would have a special responsibility to monitor the quality of courses offered off-shore, whether physically or virtually.

Institutional self-assessments every five years constitute one of the major responsibilities of the Council. The Council would receive these reports and constitute teams to audit the assessments. Where weaknesses were revealed there would be a follow up within 12 months. Failure to rectify serious deficiencies could lead to an institution losing its accreditation.

The two additional measures needed for the maintenance of high degree standards are extension of the practice of department/faculty reviews to all universities and discipline reviews based on the reports of departmental reviews plus independent assessment of samples of the examination or other evidence used in determining whether a student will graduate.

The Council would have the power to initiate enquiries into issues of quality and procedures of quality assurance, and such other matters as were related to its functions. It would not have powers relating to the appointment, promotion or dismissal of staff of institutions, which would remain as now entirely within each institution. It would not have power to dictate to an institution how a review should be carried out, but could comment on strengths and weaknesses in the institution's approach to reviews. Thus institutions would have maximum flexibility for their own quality assurance processes, subject only to possible negative comment from this external Council; one assumes that such comments would be infrequent, since it is in the interests of institutions themselves to use the best available procedures.

We have used the term 'institutions' above, and have suggested use of 'higher education' in the title of the Council, because we consider that the processes of self-scrutiny and the supportive functions of the Council could apply to any providers of higher education, not solely to universities.

Appendix A

Sampling of scripts and other evidence

In evaluating 'The Modern Australian Model' the idea of independent assessment of samples of scripts (or other evidence used in deciding to graduate a student) arose because we are not convinced of the validity of the indicators used by many quality agencies, or in influential league tables. An institution could come out tops on all the input and process measures and still graduate students who had few good intellectual skills and values, and a poor basic knowledge of their discipline or professional field. What is needed, therefore, is a mechanism for verifying that the degrees awarded by Australian institutions are of an acceptable standard having regard to the AQF specifications, benchmark standards for the discipline and the objectives of the particular course or institution concerned.

The approach would depend on the prior development of benchmark standards for degrees at discipline level. The set of benchmarks could be built up progressively, starting perhaps with fields not subject to professional accreditation and with new areas of academic work.

The sampling would be discipline based and would focus on critical levels around the pass/fail and pass honours lines. Examiners would be experts in the field and trained for the task. The scripts or other evidence would be presented anonymously. Institutions would get a confidential report. The chief objective of the exercise would be to validate the standard of Australian degrees but it could also be used as one component in making a report on the health and standards of particular disciplines. Experts in examination techniques inform us that it would also be possible to assess such scripts for more generic intellectual skills including clarity of expression. If so it would be possible to make comparisons across fields, within and between institutions. This would, however, only be done with due sensitivity to the diversity which exists across the system and a recognition that the principle of 'fitness for purpose' requires that an understanding of the objectives of a course is an integral component of evaluation.

Such an exercise would not stand alone but be part of a more general audit. In effect institutions would be asked for:

- the aims and specifications of their education programmes.
- the criteria and methods used in deciding that a student is worthy of graduation; and
- the evidence, i.e. samples of the learning outcomes.

The idea is not entirely novel. As mentioned earlier, many Australian university departments are reviewed every five to seven years; and it is not unknown for the external members on the panel to ask to see samples of final year scripts or projects. Some professional associations require scripts to be kept for review by accreditation panels. The new UK scheme envisages trained academic reviewers will have access to students' work and test institutional standards against benchmarks.

Departments or fields such as the creative arts which do not use written examinations to any significant extent would be asked to provide the evidence which is used to determine that a student should graduate.

Appendix B

Accreditation of professional faculties and schools

Accreditation of medical schools

Medical schools in Australia and New Zealand used to be accredited by the UK General Medical Council, but have been accredited by the Australian Medical Council since its establishment in 1985. Only graduates of schools accredited by the AMC, and graduates of other schools who have passed the AMC examination, may be registered to practise in Australia and New Zealand.

Schools are accredited for ten years; a shorter term may be set if the assessment team has any concerns about the course offered. The accreditation process begins up to two years before a school's accreditation is due to lapse. It begins with a questionnaire to the school, covering 'overall objectives and priorities of the curriculum; course content; educational methods; assessment techniques; course outcome evaluation; alternative options and opportunities for electives within the course; school and course management and governance; patterns of staffing including staff development and review; resources including laboratories, hospitals and libraries; responsibilities of hospitals, community centres and individual practitioners; the school's relations with the community; student selection procedures; student support and advice; and remedial programs. The questionnaire also seeks information on plans for future development and problem areas identified by the school, and requests that topics be nominated for specific consultation with the assessment team' (*Guidelines for the Assessment and Accreditation of Medical Schools* Australian Medical Council 1998).

An assessment team is appointed by the AMC on the recommendation of the Council's Accreditation Committee; the school has an opportunity to comment on the proposed membership before the team is formally appointed. A team normally comprises at least six people, and normally spends about a week at the school which is being assessed. The university concerned has usually been given 12 to 18 months' notice of a visit, which normally takes place in the semester before registration is due to expire. The school prepares a substantial submission which is provided to the team in draft six months

before, and in final form two months before the accreditation visit. The chair and secretary of the assessment team make a preliminary visit to the school to discuss arrangements for the visit and to flag issues to be raised during the visit.

The visit of the team takes about one week, during which the team has discussions with staff within the school, students, recent graduates (hospital interns), hospital staff including nurses, and other relevant people in the university, the local profession and health services. If external examiners have been used in any of the school's assessments of students, the team may ask to see their reports. If the university has conducted internal reviews of any departments or of the school, the team asks to see those reports and to be informed of any follow-up or outcomes.

After the visit, the team prepares a draft report which is circulated to all members; their comments and amendments are incorporated as appropriate into the draft, which is then sent to the school for its response. The team considers this response and prepares a final report to go to the AMC's Accreditation Committee. The committee considers that report and any comments from the school, and sends a report and draft recommendations to the university for its comment. The university may, but is not required, to comment, and may ask that a review panel be convened. When all due processes have been completed, the AMC and the Medical Council of NZ decide whether to accredit the school, or to impose conditions on accreditation, or to refuse accreditation. The final report is released as a public document.

Within the ten-year period of accreditation reports from medical schools to the Accreditation Committee are required every two years, while in the fifth year a detailed report on the past five years and future expectations is required.

Accreditation of law schools

Accreditation of Law Schools and admission of lawyers to practice is regulated State by State (or Territory). What follows is a report of a discussion with the Law Society of NSW.

Undergraduate courses

The Society's interest is in regard to the regulation of entry to practice. It is represented on the Legal Practitioners Admission Board of the Supreme Court of NSW, which accredits university courses for the purpose of qualifying people to be admitted to practice.

The Board also includes two judges, two deans of law schools, two barristers and two solicitors.

The process is essentially a paper one, using the sort of documentation used for course approval. The basic assessment is against national rules for prerequisites or core subjects in Law courses, which were set up by the Council of Chief Justices in 1994 as a reaction to the advent of mutual recognition in 1992.

The rules were intended to guard against acceptance of the lowest common denominator under mutual recognition arrangements. The rules (the 1994 Legal Practitioner Transitional Administrative Rules) were transitional but there has been no pressure since to change them. They specify 12 academic content areas—the ‘Priestley 12’—that must be covered in an undergraduate law course, but express these as titles only, not in specific detail.

The Society also nominates people to serve on Faculty Advisory Boards or review teams when invited by universities to do so.

Postgraduate courses

The College of Law course (providing training in practical aspects of a legal office, as a substitute for articles) remains the principal means of satisfying the final registration requirements in NSW. The alternative is the UTS course, which incorporates these matters into the undergraduate course. Admission by articles is no longer available in NSW, though it is in Victoria.

There is also prescription of content to be covered in postgraduate courses (the ‘Priestley 11’) but in this case the reference is to skills, not academic content.

The College of Law is a subsidiary of the Law Society. The Society also offers a six-month course to solicitors of five years’ standing who wish to specialise. In addition, it administers the mandatory Continuing Legal Education Programme (ten hours per year).

Subsequent to the discussion with the Law Society of NSW, the profession has initiated a project designed to review and to make more thorough course accreditation requirements at undergraduate and postgraduate levels.

Accreditation of engineering schools

Engineering education in Australia was from 1994 to 1996 the subject of an extensive review jointly sponsored by the Institution of Engineers, Australia (IEAust), the Academy of Technological Sciences and Engineering, and the Australian Council of Engineering Deans. The report on the review *Changing the Culture: Engineering Education into the Future* was published in December 1996. Partly as a consequence of this report, the Institution of Engineers, Australia revised its approach to accreditation of professional engineering programmes and has produced a manual to guide teams when they go about the process of accreditation. A major thrust of the review report and of the revised accreditation procedures is a new emphasis on the generic attributes of engineering graduates in addition to the traditional scrutiny of their technical competence.

IEAust considers engineering programmes for accreditation at the request of the university offering the degree concerned. Accreditation is not obligatory on universities, but graduation from an accredited course is a prerequisite for registration or licence to practise as a professional engineer. Accreditation is awarded to professional engineering programmes, not to degrees, universities or engineering schools. Where a particular award is available by two or more different routes, these may be evaluated separately after consultation between the university concerned and IEAust.

The manual for accreditation lists ten generic attributes expected of graduates, and a school seeking accreditation must state its mission and objectives and the characteristics it expects of its graduates. The accrediting team examines the elements of a programme to satisfy itself that the graduates acquire the appropriate attributes and achieve professional competence. The university must also employ some method of external benchmarking to ensure that the programme material and standards reflect relevant best practice. The students must be exposed to professional engineering practice integrated throughout their program, including experience with industry and some exposure to lectures on ethics and professional conduct.

The accreditation process is expected increasingly to focus on essential graduate outcomes and on evidence of their attainment, without neglecting scrutiny of the inputs, content and processes of engineering education. It requires engineering schools to have in place their own mechanisms for validating and continually updating programme objectives, and for assuring and improving quality. So far as possible, the accreditation process evaluates the mechanisms in place, rather than acting as a mechanism itself. Accreditation visits will occur at five-year intervals.

The accreditation process begins with a request from the university to IEAust for one or more programmes to be accredited. Once the timetable has been agreed, the engineering school submits its initial documentation covering:

- the structure of the school
- statement of university policy and support
- staffing of the school—numbers, qualifications, experience, capabilities
- facilities and infrastructure
- financial resources
- advisory mechanisms and relations with industry
- title of the school
- length and level of the programme(s)
- student admission and retention
- generic attributes
- fields of specialisation
- programme structure and content
- educational culture of the school
- programme delivery
- assessment of outcomes
- programme standards; benchmarking
- dual or combined degrees
- exposure to professional practice
- cooperative engineering programmes (where relevant)
- quality assurance systems and processes.

The documentation is considered by a panel appointed by the Accreditation Board of IEAust, usually comprising: three core members (one of whom shall be Chair of the panel), one with extensive academic experience and one with extensive experience as an employer of engineering graduates; and consultant members to cover specialisations not covered by the core membership. Further documentation may be requested.

The core members (in some cases supplemented by a consultant member) visit the school to audit its quality systems and processes, to verify that its objectives and graduate attributes are being met, and to evaluate other factors in discussion. It inspects the facilities, examines samples of students' work and holds discussions with the school's staff and students as well as with the senior members of the school and of the university.

At the end of the visit the panel provides an oral report to the representatives of the university. Within a few weeks it prepares a draft written report to the Accreditation Board, which it sends to the engineering school for comment. A response is expected within two weeks; the draft report is then finalised and sent to the Board taking account of the school's response. The Board may then: grant full accreditation for five years without conditions, or subject to certain matters being addressed within (normally) twelve months; or grant conditional accreditation for two years, pending substantial developmental action; or, refuse accreditation. In the case of refusal, a fresh application is not normally considered for at least two years.

At the conclusion of the process, the Board's decision and the final report are sent to the university.

Accreditation of accountancy degrees

There are two professional bodies to which qualified accountants may belong: the Australian Society of Certified Practising Accountants (ASCPA) and the Institute of Chartered Accountants in Australia (ICAA). The two societies collaborate in the accreditation of courses and have produced *Guidelines for Joint Administration of Accreditation of Tertiary Courses by the Professional Accounting Bodies* and a (still draft) Accreditation Kit.

This profession differs from some others in that accreditation or registration is not required before one can practise. Acceptance as a CPA or CA is an indication of quality and professional standing and is for that reason valued by employers and working accountants. A graduate of an accredited course may be admitted as a CPA on graduation, while the ICAA will admit to membership not less than one year after graduation. Both organisations provide continuing education programmes and examinations.

The accreditation procedure requires an initial visit to the offering institution, followed by annual visits until full accreditation is granted. Courses are initially given provisional accreditation; full accreditation is achieved when there is satisfaction with all aspects of the course and there is positive feedback from employers regarding graduates in the marketplace. For this stage, the tertiary institution is asked to nominate employers to provide feedback; the professional bodies contact employers regarding their employment practices and to ascertain the standard and quality of graduates' work. It is therefore almost inevitable that the period of initial provisional accreditation will last for some three to four years.

During the period of provisional accreditation, courses are subject to annual review visits. Once full accreditation has been granted, courses are reviewed every five years, or sooner at the request of the providing institution. After such a review courses may be accredited for a further five years; or accredited subject to certain conditions, with a further review taking place at a prescribed time; or provisionally accredited subject to conditions and further review; or refused accreditation and withdrawn from the list of Accredited Tertiary Courses. Review visits are supported by annual questionnaires which seek to ascertain whether any significant changes have occurred in any of the relevant matters affecting each accredited programme; any such changes will be subject to review and accreditation procedures.

The review team collects and examines data under three broad headings: inputs and resources available (including staff by rank, qualifications, status and duties); processes (described in more detail below); and outcomes, in particular relating to the employment and advancement of graduates.

The processes examined include:

- general aims and objectives of the course/s
- subjects covering the core curriculum specified by the professional bodies
- processes for design, development of content, approval, review, monitoring, teaching and assessment of particular subjects
- recent subject outlines and examination papers (but not scripts) for each nominated subject
- methods of imparting the required generic skills
- teaching methods, especially innovations
- quality assurance processes in the institution as a whole
- advisory processes involving industry, professional bodies, other areas of the university, students and employers
- staff performance management schemes and student feedback
- systems to monitor student progress in on-campus and off-campus programmes.

Accreditation reviews are conducted jointly by the two professional bodies. Reports are then sent from the review team to the respective National Education Committees. Once the recommendations have been approved by both those committees the tertiary institutions are advised by a joint letter from the two bodies.

Appendix C

Quality Assurance and Accreditation in Australian Higher Education: A legal opinion from Emeritus Professor J.E.Richardson

State legislative powers

1. Each State has a written constitution vesting in its parliament a general power to make laws; for example the *NSW Constitution Act 1902* states: 'The Legislature shall, subject to the provisions of the *Commonwealth of Australia Constitution Act*, have power to make laws for the peace, welfare and good government of New South Wales in all cases whatsoever'.
2. The States also have been held to have power to make laws having an extra-territorial operation. That is to say, a State may confer rights and impose obligations on persons and bodies beyond its borders. The power was confirmed by the *Australia Act 1986* of the Commonwealth. For such a law to be valid it must be shown to have a sufficient connection with the general power to make laws for good government etc. and is not extraneous to that requirement.
3. Thus the States may make laws on education and may impose obligations on universities and other higher education institutions operating within the State. e.g. to require accreditation and observe minimum quality standards. It could also regulate the activities of South Australian based institutions overseas.
4. State Constitutions are subject to provisions of the Commonwealth Constitution. There are some legislative powers exclusive to the Commonwealth but these may be put to one side. Otherwise the State also shares the powers that the Commonwealth had vested in it under its constitution e.g. the Commonwealth Parliament's legislative power in s 51 of the Constitution to make laws with respect to interstate and overseas trade and commerce.
5. Where there is a conflict or inconsistency between a valid Commonwealth law and a State law on the same subject the Commonwealth law prevails and the State law is displaced to the extent of the inconsistency (Constitution s 109). This happens not infrequently e.g. the *Commonwealth Matrimonial Causes Act* displaced all State divorce law.

The federal grants power

6. Under s 96 of the Constitution the Commonwealth may make grants of financial assistance to the States on such terms and conditions as it thinks fit. The States rely on general and specific purpose grants from the Commonwealth and without them could not function effectively especially in the area of education.
7. A State cannot be compelled to accept a grant of Commonwealth financial assistance but in the circumstances it may have virtually no option to refuse. The Commonwealth may attach conditions to the making of a grant which enable it to achieve policies in areas of government over which it lacks legislative power itself. Thus although the Commonwealth Parliament does not have a legislative power with respect to education it can and does use the grants power to achieve specific educational objectives. Specific purpose grants are currently made in accordance with the *Higher Education Funding Act 1988*.
8. Although over recent years the Commonwealth has retreated from an era of intervention in the course structures and so forth of State Universities the grants power is a powerful residual weapon which can be used, if necessary, to activate the States to cooperate in preserving the integrity of the present Australian university structure through such measures as accreditation and quality requirements. It is not necessary in the exercise of the grants power that all States be treated uniformly. The grants power may be used in a discriminatory manner.

Commonwealth legislative powers

9. Even without an express power over education the Commonwealth can reach into education by exercising other legislative powers it has which are not, on their face, educational. For example it can regulate the entry into Australia of university students from overseas under the trade and commerce power. It may prohibit students from enrolling at particular institutions or may attach conditions of study to students coming from overseas. Other powers are considered below.

The territories power

10. Under s 122 of the Constitution the Commonwealth Parliament has a general power to make laws for the government of any of its territories. The power has been exercised to give various forms of self-government to Commonwealth territories. The ACT and the NT have their own legislative assemblies with extensive law-making powers including education. The *Norfolk Island Act 1979* created a Legislative Assembly also with wide law-

making powers, sufficient for it to create the Greenwich University. There is provision in the Act for an Assembly law to be disallowed by the Administrator or the Governor-General but the time framework for the exercise of this power has probably past.

11. The grant of self-government does not result in any withdrawal of the Commonwealth Parliament's law-making powers with respect to the territories. The Commonwealth is free, if it wishes, to intrude into all aspects of educational matters concerning the territories. The ANU is a product of Commonwealth law-making power under s 122. The Commonwealth could by direct legislation require the Greenwich University to observe mainland university accreditation and quality standards. Alternatively, under s 26 of the *Norfolk Island Act*, the Governor-General may introduce a bill to similar effect into the Legislative Assembly.

Sharing responsibility

12. It seems to me to be consistent with their responsibilities for the States to legislate for the provision of accreditation and quality standards to be pursued by higher education institutions which operate primarily within their own borders. The Commonwealth should have similar responsibility in its territories.
13. Probably much the same may be said about the operations of State and Territorial universities in places outside Australia.
14. The position is not so clear in dealing with foreign universities or institutions of equivalent higher educational standard which seek to operate in Australia. So far the States have done little to regulate the activities of foreign universities in Australia. This may be an area where uniformity of action is to be preferred and the Commonwealth may, in practice, be in a stronger position than the States to deal with whatever problems arise for example in bringing the activities of dubious foreign universities under control.

The trade and commerce power

15. Under s 51(I) the Commonwealth Parliament may make laws dealing with 'trade and commerce with other countries and among the States'.
16. As interpreted, it does not allow the Commonwealth to deal in any substantial way with intrastate trade and commerce. Otherwise, however, the power has a plenary operation. For example, the Commonwealth may prohibit the carrying on of import or export trade in specific goods or services or it may attach conditions to the carrying on of such trade,

including conditions as to who may engage in the trade. Conditions may be attached to achieve policy objectives even though they may be extraneous to the subject of trade and commerce.

17. The Commonwealth could pass a law prohibiting a foreign institution offering courses to Australians upon payment of fees which did not meet Australian higher educational standards. A federal law could also prohibit an Australian based institution from offering courses, qualifications or facilities beyond Australia if they do not meet requisite standards. There is probably little doubt that the Commonwealth is in a better position to legislate than the States acting individually as they may.

The corporations power

18. Paragraph (x) of s 51 states that the Parliament may make laws with respect to 'foreign corporations, and trading or financial corporations formed within the limits of the Commonwealth'.
19. This power lay dormant for many years with successive High Courts giving it little content. It was at first held that the Commonwealth could not regulate the activities of the corporations in any way. However beginning in 1974 the Court has accorded the power a much expanded interpretation and today it is a powerful springboard for Commonwealth regulation of trade and commerce within Australia by the specified corporations without having to worry whether the trade and commerce is interstate or intrastate. The *Trade Practices Act* relies primarily on the power for its validity. The elements of the power are described hereunder.

(1) Corporations:

20. A corporation may be a company incorporated under the Australian companies code or by Commonwealth or State legislation or in the case of foreign corporations by equivalent laws of other countries. The essential feature is that a corporation is a separate legal entity which can sue and be sued in its own name. Most, if not all, traditional universities in English-speaking countries are probably corporations. The power assumes the existence of the corporations and hence the Commonwealth cannot prevent the formation of a corporation. Within Australia the creation of corporations is primarily a matter for the States.

(2) 'formed within the limits of the Commonwealth'

21. A corporation formed in Australia or any Commonwealth territory is formed within the limits of the Commonwealth. Corporations formed outside Australian geographic territory are foreign corporations. Thus any university incorporated overseas is a foreign corporation.

(3) Australian 'trading or financial corporations'

22. These words restrict the Commonwealth power to the extent that it would have no application to an educational institution which did not engage in trading or financial activities.
23. For some time it was not settled whether the power applied only to corporations set up for the purpose of trading (or engaging in finance) but the current test is that the character of a corporation is to be determined by reference to the nature of its activities, either actual or intended, even though it may have been formed for some other purpose such as a charitable or educational purpose. As long as the trading (or financial) activities constitute a substantial or significant part of its activities a corporation will be within the scope of the power.
24. There is little doubt, although there is no direct judicial authority, in my view, that a corporation which buys and sells educational courses for reward without actually providing courses itself is a trading corporation. If it should provide academic training on a commercial fee-paying basis it is also a trading corporation even though the object in setting it up was to provide an education resource.
25. It is more difficult to determine whether traditional Australian universities are trading corporations. It is basic that a trading corporation engages in trading to gain an income from its activities. In past years student fees have paid only a small part of the actual cost of a university education in the State universities and the universities would probably not be held to be trading corporations had that state of affairs continued. However, if a university, as a significant part of its activities, should offer courses to groups of students at levels of fees which would give the university a substantial income, the university could, in my opinion, be held to be a trading corporation. Much will depend upon the facts in each case.

(4) Scope of the power

26. It is now clear that the power extends to enabling the Commonwealth to regulate the trading or financial activities of the named corporations, e.g. in the case of a rogue university, to require it to conform to acceptable quality standards.
27. The question has arisen whether the power extends to regulate activities of a specified corporation whether they constitute trading activities or not. In the current state of judicial authorities the answer is probably 'yes' but not much attaches to this aspect of the power for the purposes of the current project.

28. So far as foreign corporations are concerned the Commonwealth power is not limited by the words 'trading or financial' which means that the Commonwealth can use the power to regulate the activities in Australia of any foreign university or equivalent institution.

(5) Characterisation

29. The question arises as to just what laws may be made under the power with respect to the named corporations. To fall within the power the Commonwealth law must pass the test that it is a law with respect to the corporation and not a law on some other subject. This is to say there must be a sufficient or significant connection between the federal law and the power. A Commonwealth law on accreditation and quality control applicable to the specified corporations would, in my opinion, have such a connection. It must be said, however, that the High Court has not been of one mind in applying the characterisation test.

(6) Imposition of duties on individuals

30. The power has been construed to enable the Commonwealth to impose duties on persons not themselves corporations e.g. a prohibition on members of a union imposing secondary boycotts on a trading corporation which is in dispute with its employees who are members another union. How far the Commonwealth can go in this direction is far from clear. The question could arise whether the power extends to prohibit any person in Australia from buying a course from a non-compliant university subject to the corporations power. In theory, at any rate, a State law could impose such a prohibition and it may be it could be done under the corporations power. However it is not possible to express an unequivocal opinion especially in view of recent changes in the composition of the High Court which may result in a less expansive interpretation of Commonwealth powers.

External affairs power

31. The project is grappling with problems common to several countries and, I gather, the possibility of coordinated action is not out of the question.
32. Under s 51 (xxix) the Commonwealth Parliament may make laws with respect to 'external affairs'. External affairs means affairs virtually of any description geographically external to Australia.
33. The power once received a relatively narrow construction but a transformation of its content has occurred in recent years. At one time the prevailing view was that the Commonwealth could only legislate to give

effect to international conventions or treaties on subjects which were undeniably international in character e.g. peace treaties. Now, however, there are no limits to the topics which may be the subject of international rights and obligations as Australia's international personality expands.

34. The current position is that if the Commonwealth enters into a bona fide international commitment it has full power to make laws to give effect to that commitment even though it means that the subject matter, apart from the external affairs power, is a matter of State and not Commonwealth legislative power e.g. pursuant to an international convention on the protection of the environment legislating to prohibit activities on environmentally sensitive land within a State. It is not necessary that the international agreement should be a matter of international consequence as long as there is general international agreement on the subject matter as being appropriate for an international agreement. As time goes by more and more subjects are being brought within controlling conventions which were once regarded as being purely of domestic and not international concern. If a convention were to be negotiated between countries interested in the global protection of university standards to require, for example, that the parties to the convention conform to a particular system of accreditation the Commonwealth Parliament could give full effect to the terms of agreement and apply them to all institutions of higher learning covered by the agreement without having to rely on State legislative power at all.

Other Commonwealth powers

35. There are other legislative powers which could have some bearing on the subject under enquiry such as the social services power (benefits to students), the immigration power and the power to make special laws for particular races (Aborigines). It seems premature to canvass them at this stage.

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