

## “Being TEQSA Ready”

A series of articles in *Campus Review* in 2012 by members of the Discipline Scholars Network

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# TEQSA ... it's risky business

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Ian Cameron and Mark Freeman

TEQSA was established 30 July 2011, and got its regulatory teeth on January 29 this year.

In the words of DEEWR, TEQSA will “transform the scale, potential and quality of the nation’s universities and open the doors to higher education to a new generation of Australians”. In carrying out its function, TEQSA’s actions in regulating the higher education system will be characterised by a standards based framework and the principles of: regulatory necessity, risk and proportionality.<sup>1</sup>

The TEQSA legislation “is specifically designed to ensure that only quality providers of higher education enter the system and that by using a risk based approach to regulation, providers who are at greater risk of non-compliance are readily identified and more closely monitored”.<sup>2</sup>

The higher education sector has eagerly awaited clarification about how TEQSA will assess risk to fulfill its mandate and that regulatory risk framework was announced today<sup>3</sup>. An initial review suggests that on balance it is a positive step forward. But no approach is free in itself from risks that might thwart or distort a regulator’s role. It is risky business.

So, what’s at stake? The stated focus of this regulatory framework is on the student, provider collapse and the reputation of Australian higher education. These are multi-dimensional risks, in terms both of levels of harm and the likelihood of harm occurring. The challenge is to identify those factors or circumstances that generate harm and judge their likelihood of occurring. Armed with information and insights, TEQSA commissioners are responsible then to make judgments about the necessary actions that providers would undertake to address unacceptable risks. Seems simple really ... or not? Let’s dig a little deeper.

Having a risk focus is certainly not new from a regulatory perspective. Regulators of land use and banking have used risk-based approaches to inform decision-making for decades. Our challenge is that a risk-based approach will be at the centre of regulating performance of higher education providers.

‘Risk’ featured regularly in AUQA audit reports – risk registers, academic risk, reputational risk, students at risk – but the context was almost exclusively negative, warning of potential adverse outcomes. The framework identifies 46 indicators and sensibly flags the need to balance those that are quantitative versus qualitative, discrete versus composite and lag versus lead. These are spread across the six different categories (e.g. financial; governance) identified in the thresholds legislation (Provider Standards and Qualifications Standards) - plus an ‘other’ category. Importantly, it recognises that there is a role for experts and that

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<sup>1</sup> Tertiary Education Quality and Standards Agency Act 2011, Act No. 73,

<http://www.comlaw.gov.au/Details/C2011A00073>

<sup>2</sup> Explanatory Statement, TEQSA Act 2011, Higher Education Standards Framework (Threshold Standards), pg 22. <http://www.comlaw.gov.au/Details/F2012L00003/a7405019-b444-47d9-8297-681903290c50>

<sup>3</sup> <http://www.teqsa.gov.au/regulatory-risk-framework>

holistic judgements are needed and risk profiles won't add to one number or rating. And while they have some lead indicators (e.g. complaints) that predict potential larger problems, a key question is whether there are enough lead indicators compared to an overreliance on lag indicators.

While risk based perspectives shouldn't be new to some in higher education, particularly those in governance, it is probably not on the radar for most staff. Awareness and ownership of risk is one challenge but building a "risk savvy" culture is qualitatively harder. As the sector moves from a more tightly controlled regulatory regime to a more open and risk-based one, transition is another risk. The framework recognises that there will be a period for learning. But as shared understandings, skills, internal processes and strategies are developed, providers can make mistakes. Remember the large state banks we once had in Victoria and South Australia that didn't transition in the 1980's?

The framework goes a long way to clarifying the main risks providers generate and it is now clearer that the main risk bearers of concern are students and the sector's reputation. And it is also clearer how risks will be identified, represented and assessed. But are there other stakeholders or events that history can't help us with? "Unk unks" or unknown unknowns can be particularly devastating because by definition we can't plan for them. Although in hindsight it may seem obvious - like building a nuclear reactor in the wrong place. One we would like to put on the table is whether it is really possible to reach the target 40% of the 25-34 year old population with a undergraduate degree by 2025 without credentialism taking over and compromising learning standards.

Explicit standards can help identify major risks. While the framework focuses on "threshold" standards (applied to Provider and Qualifications standards), what about the other standards domains: Teaching and Learning, Research and Information. And will the threshold focus result in a minimal compliance aspect, essentially similar to existing Australian Standards. Is 'just acceptable' the place where many providers wish to be, given the quality agenda? For some, yes. Other providers will decide for competitive reasons that their niche is well beyond mere compliance and their aspirations are for excellence. The option of higher pursuit is evident in other sectors, for example in the safety features on a top range Mercedes vehicle.

How will risk be handled practically? If you pull out your car's service booklet, you'll see short and quick services as well as long, complex and comprehensive services. Why not the same service every time? It's simply because of the risk assessment of failure attributed to various components of your car. Clearly not everything needs the same breadth and depth of scrutiny at any point in time. That's not to say we don't do a thorough check at critical times. Likewise, the 'proportionate' aspect of TEQSA's activities will take a similar approach. According to the framework providers will be annually scanned but more dynamic responses are possible. Will dynamic responses be sufficient during this current period when global economic uncertainties are significant and the government is changing other levers such as demand driven funding at the same time?

The framework identifies those indicators with major significance and those with an international element. How will TEQSA's provider case managers estimate 'very low' likelihood, or 'catastrophic' severity? How might risks on different factors be aggregated? How will shared understandings be established across the sector? As consequences of high-risk ratings are potentially significant, commissioners' judgements will be closely scrutinised and demands made for greater objectivity.

Finally, risk considerations should not strait jacket entrepreneurship and innovation in the higher education sector. In fact, calculated risk taking should be encouraged and the TEQSA legislation recognises the value of diversity and the need to avoid entrenching the status quo. But TEQSA is not evolving in a static context. How will the sector look in a few years' time as providers understand and throw off the shackles of demand driven funding and innovate? And then there are the new private providers upsetting the competitive applecart.

Risk needs to be seen simply as the way to characterise uncertainties in the future and use it to maximise performance and minimise unwanted outcomes. Organizations will need to be resilient as they adapt to rapidly changing national and international dynamics.

It's a risky business not just for public providers as well as private providers, but for the regulator too.

Biographical details:

Ian Cameron,  
Professor, School of Chemical Engineering, The University of Queensland.  
Ian was an ALTC Senior Fellow and Discipline Scholar in Engineering and ICT.

Mark Freeman,  
The University of Sydney Business School,  
Australian Business Deans Council Scholar.  
Mark was an ALTC Discipline Scholar in Business, Management and Economics

## Harmonising multiple layers of regulation

Maree O'Keefe and Amanda Henderson

Many qualifications require accreditation by professional bodies and the advent of TEQSA and in particular the AQF has brought into sharp focus, the different quality assurance paradigms operating within professional accreditation and higher education. In our discussion we will use health care as an example to demonstrate some of the significant issues. Some are more relevant to health care than other disciplines, but in most cases the themes and issues are common.

Healthcare is delivered by a complex multi-disciplinary constellation of professionals, and has a long history of quality and safety standards monitoring. Although many healthcare disciplines already have well articulated learning outcomes with comprehensive professional accreditation, there has been little, if any, formal articulation with academic quality assurance processes. In many instances the main purpose of quality assurance within health care disciplines is to meet the relevant legislative requirements for registration to practice within the health care discipline concerned.

The Australian Health Practitioner Regulation Agency (AHPRA) is the newly established organisation responsible for the registration and accreditation of health professions across Australia<sup>1</sup>. AHPRA's operations are governed by the *Health Practitioner Regulation National Law Act 2009*, which came into effect on 1 July 2010<sup>2</sup>. This law means that for the first time in Australia, health professions through their Boards are regulated by nationally consistent legislation. The primary role of the Board is to protect the public and set standards and policies that all registered health practitioners must meet<sup>3</sup>.

Nationally, educational institutions strive to ensure that their processes, structures and resources enable optimum teaching, learning and assessment of students and that the standards established by licensing and accrediting bodies are met. Graduates of regulated healthcare disciplines are then understood to have attained the learning outcomes consistent with industry standards and can register to practice as professionals in their field.

It should be noted at this point that health care professional accreditation requirements now overseen by AHPRA, although stringent in themselves, are not always the same as academic standards for learning and teaching as required by TEQSA. Clearly the two are intimately related however there are at times subtle differences, most often in relation to the underlying purpose. In the case of academic quality assurance, there is a focus on student learning outcomes that culminate in the award of an academic qualification at a particular level. For professional accreditation, there is a focus on student learning outcomes in relation to the requirements for safe and competent professional practice.

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<sup>1</sup> <<http://www.ahpra.gov.au/>>

<sup>2</sup> <<http://www.ahpra.gov.au/Legislation-and-Publications/Legislation.aspx>>

<sup>3</sup> <[www.ahpra.gov.au/About-AHPRA/Who-We-Are.aspx](http://www.ahpra.gov.au/About-AHPRA/Who-We-Are.aspx)>

The ways in which these two processes can be out of step is illustrated by the lack of a neat fit for many healthcare qualifications with the recently formalised AQF. Level 7 bachelor and Level 9 coursework masters programs where there has been no preceding cognate Level 7 qualification, may both meet professional entry-level requirements for registration as a health care practitioner in a particular discipline.

As noted above health care is not alone in these challenges, and they affect to a greater or lesser degree all qualifications offered by higher education institutions that are also subject to professional accreditation processes. In these cases there is no distinction made on the academic standards of Level 7 as compared with Level 9 qualifications. There are however in some cases different expectations in relation to the inputs expected (for example in accounting there is less requirement on masters degrees to have generalist content)<sup>4</sup>.

The new higher education landscape with the introduction of TESQA, established to ensure the maintenance of standards for courses of study, includes a requirement that there are internal processes that "take account of external standards and requirements, e.g. published discipline standards, professional accreditation, input from relevant external stakeholders, and comparable standards at other higher education providers;" and that the qualification awarded meets the corresponding AQF requirements<sup>5</sup>.

Universities are currently managing quality assurance at multiple levels including internal quality reviews, professional accreditation processes for different disciplines, and the soon to be implemented institutional TEQSA risk assessments for continued registration as a higher education provider. At a practical level, this multi-layered regulatory requirement culminates in very elaborate spreadsheets, and/or matrices that collectively may or may not add value to the purposes of verifying quality teaching practices that assure graduate learning outcomes. Anecdotally, universities are increasingly drawing upon professional accreditation processes and outcomes to inform and, at times substitute for, institutional quality assurance at the program and at times course level.

TESQA acknowledges that consideration of 'reliance on third parties and professional accreditation' are an important component of their risk-based approach to regulation of higher education<sup>6</sup>. Therefore there is much value to be gained if higher education institutions and professional accreditation bodies confirm and articulate the intersection of learning outcomes with the professional bodies' standards and TESQA expectations. This process of identifying and matching the overlapping goals and expectations of educational, professional and government institutions will highlight any gaps or mismatches related to teaching, learning and assessment in such a complex context, and promote a continuous dialogue between institutions, accreditation agencies and TESQA. Only a comprehensive dialogue can ensure that the three stakeholders' values and goals will be in harmony.

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<sup>4</sup> <http://www.cpaaustralia.com.au/cps/rde/xbcr/cpa-site/international-accreditation-guidelines.pdf>

<sup>5</sup> [www.comlaw.gov.au/Details/F2012L00003](http://www.comlaw.gov.au/Details/F2012L00003)

<sup>6</sup> <http://www.teqsa.gov.au/regulatory-risk-framework>.

The enhanced dialogue that must accompany the successful implementation of these indicators will actively promote the consistent standard of quality graduates across the sector that is desired by both the higher education sector and employers. It will ensure that there is alignment around the expectations of industry and the course of study offered by higher education institutions thereby promoting greater relevancy of content, learning and assessment in courses of study. It will also assist in minimizing the amount of re-work that needs to be undertaken by higher education institutions in demonstrating the quality of their courses of study and the requisite level of student attainment to satisfy various regulators.

While this work appears relatively seamless in principle the challenge is in enacting this alignment so that there is congruency across higher education requirements and demonstration of professional standards. Apart from the very different operational nature of how these two systems (for example, in the first instance the timing and frequency of these processes rarely coincide), there also exists stark differences in what information and how data is presented for each regulatory body. The challenge is consensus about the measures that are a valid indication that students have attained a requisite standard of knowledge, skills and abilities.

The outcomes of the ALTC Learning and Teaching Academic standards project, in identifying broad learning outcomes in a number of disciplines, offers a useful framework to assist in this important work of alignment. The identification of threshold learning outcomes in health for example has supported active debate across 26 different health care professions around the potential to better align professional accreditation and academic quality assurance processes<sup>7</sup>. Further work is currently underway to develop a framework of common assessment principles and processes for embedding these threshold learning outcomes and their assessment into existing health care course and program organisation and documentation. This is intended to satisfy professional accreditation and academic quality assurance requirements at institutional and program level, as well as for TESQA.

Amongst matters yet to be fully resolved is the question of how 'risk' will be assessed, firstly by case managers and subsequently by TEQSA commissioners in relation to the assessments made by professional accreditation bodies. Few if any disciplines have an existing body to represent all stakeholders. Differences will continue to exist around the specific purposes of professional, accreditation and higher education bodies. However, the desired requisite standard of graduates is the point at which the interests converge.

*Professor Maree O'Keefe is Associate Dean Learning and Teaching Faculty of Health Sciences, University of Adelaide and an ALTC Discipline Scholar in Health, Medicine and Veterinary Science.*

*Professor Amanda Henderson is a clinical academic titleholder at Griffith University, Nursing Director Education, Princess Alexandra Hospital, a Queensland Health Research Fellow and an ALTC Discipline Scholar in Health, Medicine and Veterinary Science.*

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<sup>7</sup> <http://www.olt.gov.au/resources?text=Health%2C+Medicine+and+Veterinary+LTAS+Statement>

## Standards prompt Curriculum Reform in the age of Google

Roger Hadgraft and Ian Cameron, ALTC Discipline Scholars in Engineering and ICT

The first two articles in this series focussed on risk management issues and the challenges raised by combining professional accreditation with TEQSA's need for standards compliance. Both of these articles consider what needs to be done to comply in this new standards framework.

This article takes a different angle. We want to consider the *opportunity* that change offers. Specifically, we want to look at the sorts of curriculum changes needed to truly meet the kinds of the outcome standards that have been defined. Our research shows that curricula need to engage students in the *practice* of the discipline. Graduates need to develop the integrative, disciplinary skills (the threshold learning outcomes) together with the theory and knowledge that underpins them. This theory and knowledge is also much broader than before, including explicit knowledge of teamwork, communication, problem solving, critical thinking, ethics, sustainability and many more.

This sounds difficult because it suggests less time will be available for lectures about the core disciplinary knowledge. Fortunately, a replacement has fallen in our laps, namely the Internet, Google and other search engines, which provide access to subject materials on billions of subjects, millions of online tutorials, learning communities, social media tools and so on. One could almost begin to wonder: what is the role of the university under these circumstances? If students can freely access the knowledge of every discipline, are universities about to be disrupted?

We've already seen Apple make a push in this direction, though its concerns seem mostly to be about schools at the moment. Nevertheless, Pearson, Wiley and other major publishers are making steady progress in turning their large textbook collections into rich learning environments supported by online quizzes, videos and more.

We are going to suggest that the standards agenda is an opportunity in disguise; it is an opportunity to reinvent the university (and if we don't, someone else will). The difficulty is that this opportunity comes disguised as hard work.

Each of the learning and teaching frameworks speak of a disciplinary holism that is not always obvious from university handbooks, which describe lofty *program* objectives that seem unfulfilled by the collection of *subjects* that make up the program. How are those holistic objectives (program objectives and the threshold learning outcomes) achieved by the program structure? In most disciplines, this is by no means obvious and this, hopefully, is the difficult question that TEQSA will be asking us to answer.

We contend that existing curricula were mostly developed at a time when content ruled. Each piece of content required careful teaching and was difficult to access in the everyday world. Often these were new bodies of knowledge that were escaping the university for the first time, the product of active research programs following the second world war. This was secret and specialised knowledge.

It was assumed that graduates would move into the workplace and make sense of their education in the whole, applying the content while learning the craft of their discipline from practitioners around them. It was a slower world and employers seemed to be able to support this internship period of a graduate's development when they were not necessarily very productive.

Much of this knowledge is now routine and it makes up the bulk of an undergraduate education. Most of this knowledge has been captured online, not just in descriptive documents, as declarative knowledge, but also as procedural knowledge. Flick open Wikipedia and be amazed at the depth of coverage of your discipline. Not only is there a wealth of tutorials to explain almost anything, there



are also intelligent agents that will execute many procedures automatically. Apple's Siri is likely the best-publicised example in recent times, but more mundane examples include computer aided design tools and symbolic mathematics programs. These tools free us from the need to remember facts and to perform mundane tasks, opening up the possibilities of more holistic and creative thinking and it is in this environment that the standards issue has emerged.

So, we can see standards as a regulatory process, which they are, but we can also see standards as an opportunity to think hard about what the educational outcomes really need to be. The threshold learning outcomes already defined are a useful step in this direction. They try to articulate the gestalt of each discipline in an age when knowledge is at our fingertips.

Consider the engineering ones, which require graduates to *understand the need, the context and the system in which a problem is embedded; use design and problem solving processes to tackle the problem; use modelling tools to quantify system response; work with others in the solution of such complex problems; and be self evaluating and self regulating, engaged in lifelong learning.*

We now expect something more from our graduates than an ability to regurgitate facts and to execute procedures (such as calculations in engineering). A quick scan of the threshold learning outcomes from other disciplines shows that each of them is attempting to grapple with the whole rather than the parts. For example, in history, graduates will be able to *examine historical issues by undertaking research according to the conventions of the discipline, analyse historical evidence, construct an evidence-based argument or narrative, and identify and reflect critically on the knowledge and skills developed in their study of history.*

University curricula, however, are largely stuck with the tyranny of the sum of the parts. There are few curricula that have an overall gestalt or architecture that clearly delivers the high level disciplinary outcomes. Some professional disciplines, eg medicine and architecture, have come closest, because they have the clearest view of the kinds of professional practice that they need students to be able to *do* by the time they graduate. This cohort is corralled and passed through a process that requires regular practice of the skills of the profession combined with rich opportunities for feedback, such as simulated patients in medicine and design exhibitions in architecture. Work integrated learning is one popular means of engaging students in the practice of their discipline and it is now being used more widely in many programs at many universities.

At the other end are general science and humanities programs that provide students with such a range of options that it is hard for students to see what it means to be a scientist or a humanist unless almost every subject they undertake captures the essence of practising the discipline. Sadly, this is rarely the case, with subjects usually being specialised windows into knowledge about topics rather than developing the skills of the discipline (the threshold learning outcomes).

So, this is our opportunity. As we grapple with the need to demonstrate the threshold learning outcomes, we must reconsider the *architecture* of our programs, which must have a structure that reflects the achievement of the outcomes rather than coverage of the knowledge domain, which is clearly impossible. It is far more possible to learn the *practice* of the discipline than it is to learn the *knowledge* of the discipline. This must be our focus.

There is another, related problem and that is that we need collectively to invest in organising the online learning resources on which we will all rely. This is a critical issue that requires national and international cooperation. But that's a story for another article.

## A Perfect Storm in Education

By Gregory Heath

The discipline of education seems to never be far from the spotlight of political and community focus. We see frequent calls from politicians, parents, economists and industry leaders to improve school learning outcomes by improving the quality of teachers. It seems that everybody has a fix in mind, which however, often stops just short of actually lifting the professional status of teachers.

The field of education, and particularly school education, is currently experiencing a process of rapid and dramatic change of the type seen once in a generation. Some of this change is being driven by external factors such as national teacher registration requirements, the national curriculum, the revised AQF and community expectations of school performance and teacher quality. Other aspects of change are being driven from within the discipline in response to social, technological and cultural change. This environment of significant change provides a set complex challenges and opportunities for the discipline.

A constant theme in the discipline of education is the tension between what the tabloid version of public opinion holds that teachers ought to know and be able to: -that is to teach kids to spell, add up and to do what they are told; and what professional educators understand as the important capacities to cultivate in young people as they develop and mature to face a complex and uncertain future. It sometimes seems that anyone who has been to school is an instant expert on education and school management. Politicians are often, and understandably, prey to such populist calls to regulate and “improve” education outcomes. It seems that no other profession is subject to such widespread and vociferous public debate.

In this context there are many calls for effective measures of quality improvement and the current period is seeing some of the most far-reaching and intrusive measures put into place.

In the past 24 months there has been:

- the establishment of the Australian Institute for Teaching and School Leadership (AITSL) with detailed national requirements for teacher registration and accreditation of teacher education programs,
- the introduction of the National Schools Curriculum and the establishment of the Australian Curriculum and Assessment Authority (ACARA) to oversee it,
- the introduction of the National Assessment Program with the NAPLAN tests,
- the establishment of the “My Schools” website focussing attention on individual school performance,

- the productivity commission Draft Research Report into the Schools Workforce,
- the Review of Funding for Schooling –the Gonski Review,

Added to this are the system-wide reviews and policy and regulatory changes in higher education, notably:

- the revised AQF –which in conjunction with AITSL requirements has implications for graduate teacher entry courses,
- the establishment of TEQSA with the emerging influence on standards,
- the implementation of the Bradley Review recommendations where the uncapping of CSP undergraduate load, but not of postgraduate CSP load is presenting faculties and schools of education with particular issues,
- the Base Funding Review that has specific implications for the practicum and discipline studies.

Also added to this are frequent, often partisan, economically inspired, “think tank” contributions to the debate.

Taken together these diverse impacts do indeed add up to nothing short of a “perfect storm in education”. In the discipline of education those who research and teach and who are charged with the preparation of teachers struggle to cope with these turbulent cross-currents and increasingly find it more difficult to exercise their critically-evaluated and evidence-based professional judgement in their work.

It would indeed be helpful if each of these reviews and regulatory measures were consistent and cumulative, but this is no ideal world and as the levels of conflict and confusion mount it requires increasingly careful navigation for all in education.

One such area of conflict relates to the status of graduate entry teacher education. The well-founded AITSL requirement, adopted by MCEECDYA in 2011, that teachers must have a minimum of four years post-secondary education and at least two years (equivalent) study of the theory and methods of education, when read in conjunction with the Revised AQF, results in the effective replacement of the familiar Graduate Diplomas in Education with either a Master of Teaching or Master of Education degree. This is because any graduates who have not previously studied education will be now required to do a two year pre-service teacher education course and a Master’s degree is the obvious choice for most. This is laudable in itself and moves Australia towards international best practice benchmarks in the professional preparation of teachers. But the situation is far from straightforward. Current indications are that DEEWR will provide no additional Commonwealth Supported Places in education for graduate entry pre-service teachers, with the consequence that either more graduate students will have to pay full-fees, or that faculties and schools of education would have to halve, or at least substantially reduce, the number of graduate entry teacher education places. The outcome in practice will come down a mixture of both approaches, but it is likely that there will be fewer graduating teachers, particularly at the secondary teaching level. But the

confusion for academic planning does not end there. The Draft Productivity Commission Report, yet to be adopted, recommends, in conflict with the AITSL policy, that, “two year graduate entry courses not be mandated.” It is very hard to plan effectively in this environment.

Examples of a confusing and conflicted policy framework could be multiplied. For instance, rather than making a clear recommendation on the funding of the teacher education practicum, as supported by the Productivity Commission Report, the Base Funding Review “handballed” it back to a committee for State and Commonwealth governments to resolve, when they have not been able to do this for decades. Or again, there are moves to a more standardised and regulated curriculum alongside calls for more flexible and culturally sensitive learning to meet individual needs. The list, unfortunately, could go on.

Through these stormy waters it is not surprising that those charged with the preparation of teachers and other members of the education profession often feel discouraged and conflicted themselves. Yet, it would seem that when it comes to setting policy frameworks and establishing, monitoring and reviewing standards, the members of the academic discipline, those who conduct, review and evaluate the research and teaching, are the last to have their voice effectively heard.

The research is in. And counter to many of the currents in recent education policy in Australia, it tells us that the school systems that have the best outcomes, of which the Finnish system is the most widely cited example, have teachers with advanced levels of education, usually to the Masters degree level, who enjoy high professional recognition and are able to exercise a large degree of autonomous professional judgement in curriculum design and delivery.

It is here that the recent ALTC Learning and Teaching Academic Standards project comes into particular focus as it has provided the discipline and the related professional stakeholders in education with an avenue to voice their distillation of the key learning outcomes for the discipline, without necessarily relating them to the stipulations of the professional or regulatory requirements of external agencies. Based on extensive consultation and supported by the Australian Council of Deans of Education, the learning outcomes statements established in the ALTC project for both Master’s and Bachelor’s degrees in education provide an authoritative statement which reflects the considered judgement of academics, professional associations and leading employer groups in the field.

A key factor in this approach is that the wider education profession and the community can be confident that the academics working in the discipline are articulating and delivering an advanced and detailed set of agreed learning outcomes. They can be assured that courses in education prepare teachers and other education professionals for the future challenges of knowledge and practice to the highest standard. What this comprehensive approach takes into account are the complexities of social, cultural and technological change, the

advancement of knowledge and practice, the needs of employers and community stakeholders, and the values that are essential to living a rich and fulfilling life.

In the quality assurance approach taken by TEQSA to learning and teaching standards, TEQSA Standard 3, it will be important to involve the discipline communities when determining risk and what this means for students. It is the discipline community of researchers, teachers, practitioners and professional associations who will be best placed to judge the learning and teaching standards against which risk to students can be fairly judged. It is certain that many interest groups, some with partisan perspectives, will weigh into the debate of learning and teaching standards in education with claims that pre-service teachers are being insufficiently grounded in any of literacy, numeracy, classroom management, analytical skills, health education, work readiness or whatever. Some of these claims may have merit and some may not and it is important to take into account the views of the wider community. But it will rarely be the case that representatives of such interest groups will have the encompassing, well-informed, critically-evaluated, evidence-based knowledge and authority of experienced and engaged education scholars.

## Being TEQSA Ready – Guiding Good Practice for Virtuous Compliance

### Sally Kift

Under the theme “Being TEQSA Ready” in preparation for monitoring and enforcement of the new Higher Education Standards Framework, previous articles in this series have focused on risk management, the challenges of harmonising multiple layers of regulation and the need to make sense of diverse discipline reviews in this dynamic environment.

These are all important issues and are deservedly attracting considerable attention. In the case of my own discipline (law), when the Council of Australian Law Deans (CALD) endorsed the law Threshold Learning Outcomes (TLOs) in late 2010, it identified five different layers of regulation applicable to legal education, and urged that “external review, approval and accreditation processes [should be] consistent, coordinated and ideally able to be conducted by a single mechanism accepted by each relevant agency” (Law Standards Statement, 2011, 6).

In teaching and learning, trying to hit the moving target of an evolving regulatory framework in this environment with a minimal, “tick a box” compliance mindset is unlikely to deliver quality (or even necessarily compliant) courses, let alone lead to the development of robust mechanisms for collecting data to satisfy TEQSA’s assurance of learning requirements. As has always been the case, what is required for good (or even average) quality in program design is curriculum that is intentional and coherent, is constructively aligned and develops agreed program learning outcomes (discipline knowledge, skills and their application) in an integrated and incremental way over the whole program of study.

Therefore, whilst acknowledging the current regulatory uncertainty and complexity, this article, like Roger Hadgraft’s *Curriculum reform in the age of Google* (Campus Review, 2 April 2012), explores the pedagogical opportunities that “Being TEQSA ready” presents. It suggests that, in spite of the push and pull of multiple regulatory and other forces, the sensible sector response should be one of “virtuous compliance” with the framework’s worthy regulatory intent, especially in the learning and teaching domain.<sup>1</sup>

While we await the Higher Education Standards Panel’s development of the remaining standards for Teaching & Learning, Research and Information, what we do know is that a number of teaching and learning threshold standards already appear in the existing Provider and Qualification Standards. We also know that the teaching “process” standards will likely be developed separately from the “outcomes-based” learning standards. While the yet-to-be-determined Teaching & Learning Standards are not currently threshold, there have been hints that we cannot be certain what the government may chose to do once they are developed.<sup>2</sup>

What to do then in this environment, when it is also probably true that the risk based nuances of the TEQSA regime are yet to be fully appreciated by many HE teachers in the disciplines?

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<sup>1</sup> R Johnstone, (2011). Assuring Legal and Education Standards: Regulation and Compliance. Keynote, *Australasian Law Teachers Association Conference 2011: My Lawyer Rules*, Brisbane.

<sup>2</sup> Teaching standards will have bite, *The Australian*, 25 August 2011.

Ideally, and pausing to remember that the quality of the student experience of Australian HE lies at the heart of this agenda, it is to be hoped that disciplines (via their signature courses and pedagogies) will respond to TEQSA oversight and the Standards Framework substantively and virtuously and eschew a “tick a box” mentality. The imperative to assure the delivery of robust and defensible program learning outcomes for Australian higher education students is, at its most basic level, a worthy regulatory goal that deserves the sector’s genuine engagement and support.

For those who remain to be convinced, the *Higher Education Standards Framework (Threshold Standards) 2011*, a legislative instrument made under the *TEQSA Act 2011*, provides some incentives and guidance.

In the context of curriculum design and delivery, the *Qualification Standards* explicitly reference and require compliance with the revised Australian Qualifications Framework (AQF). The *Provider Course Accreditation Standards* similarly require that course design is “appropriate to and meets the Qualification Standards” and that, for example, “assessment is effective and expected student learning outcomes are achieved”. The revised AQF now requires that *all* (no longer a majority of) program learning outcomes must be at the requisite qualification level.

The *Provider Course Accreditation Standards* require that HE providers ensure that all staff who teach students “have an understanding of pedagogical and/or adult learning principles relevant to the student cohort being taught”. The *Provider Category Standards* refer to the necessity for providers in the “Australian University” category to demonstrate “sustained scholarship that informs teaching and learning in all fields in which courses of study are offered” and require a provider “identifies and implements good practices in student teaching and learning”.

How might HE providers meet these various threshold requirements?

The 11 sets of discipline TLOs developed under the ALTC’s Learning and Teaching Academic Standards (LTAS) project (see <http://disciplinestandards.pbworks.com/>), and those now being developed in further disciplines, are a genuine attempt to negotiate the regulatory minefield and have taken compliance with the revised AQF as their starting point. Working with professional bodies and other external stakeholders, the TLOs have delivered consensus across broad disciplinary communities around what graduates of the discipline, to use the AQF language, should “know, understand and be able to do as a result of learning”.

The next obvious stage in this process, having developed program learning outcomes that satisfy both the broad disciplinary community and the AQF, is to consider implementation and encourage highly desirable levels of diversity across the sector. How is the teaching, learning and assessment of these more complex program learning outcomes to be achieved?

In the extensive consultations conducted by the Discipline Scholars over 2010-2011, it became clear that most discipline academics find it much easier to imagine and apply good practice if they can access concrete disciplinary examples. What does this look like in practice *in my discipline*? Is it even possible? Has anyone in my discipline done this before – show me some practical examples?

This is where the LTAS legacy projects, which have funded the development of Good Practice Guides (GPGs), come in. Before we can move confidently to the next stage in the standards agenda of moderating and benchmarking examples of student assessment, there is an urgent need to develop informed communities of practice and the capacity of discipline academics to deliver the constructively aligned curriculum on which the Threshold Standards are predicated, in order to demonstrate student acquisition of integrative program learning outcomes.

The initiative of the GPGs, six of which were developed in law in 2011 (see <http://disciplinestandards.pbworks.com/w/page/52746378/Law>), with further titles being commissioned over 2012, has now also been taken up in the disciplines of Science and Building and Construction. These research- and evidence-based resources tap into the pedagogical content knowledge of the discipline and speak its language, while also providing the foundation for understanding and implementing good and scholarly practice as now mandated by the Threshold Standards.

The law GPGs were commissioned by the Law Assistant Deans (T&L) Network via an EOI process. Modest funding was allocated to the successful legal educator/applicants and the Law AD Network provided feedback half-way to them through the writing process. Each GPG directs attention to a specific aspect of the TLOs' interpretation of the AQF and contains a literature review, a summary of key points, an identification of areas requiring further work and a collection of resources.

In this way, the GPGs provide concrete examples of good practice in action, highlighting the possibilities for implementation to meet or exceed threshold requirements and encouraging diversity across different institutional contexts, missions and goals. They provide a "current status" account of relevant discipline pedagogy, in addition to putting flesh on the bones of more recently embraced program outcomes such as creativity and self-management.

In several instances the GPGs also advance practice: for example, as regards self-management, the commissioned Guide makes an important and timely contribution to the issue of student mental health; the Ethics and Professional Responsibility Guide provides critical direction for legal educators regarding vexing issues of ethical reasoning and the exercise of professional judgement; while the Statutory Interpretation Guide provides the academy with the opportunity to demonstrate to the practising profession and the judiciary that it takes seriously professional concerns around graduates skills in this area.

We can tie ourselves up in disciplinary knots and approach TEQSA's regulatory requirements reactively in minimal compliance mode and try to second guess known (and unknown) unknowns. Or we can respond conscientiously and try to do the right thing by our disciplines, our stakeholders and our students. The TLOs and their subsequent roadmaps for implementation as provided by the GPGs are a virtuous and infinitely more satisfying way to move towards "Being TEQSA Ready".



Sally Kift is an ALTC Discipline Scholar in Law and the incoming DVC(Academic) at James Cook University. For The Discipline Standards in Australia website see <http://disciplinestandards.pbworks.com/>

## Learning standards: giving airtime to the disciplinary voice

Mark Freeman and Jonathan Holmes

No one would seriously argue that disciplines shouldn't be the main driver of learning standards used to benchmark program quality. Academics have a strong allegiance to their disciplinary tribe. Getting disciplinary engagement is clearly crucial in evidencing planned and delivered learning outcomes to meet TEQSA threshold standards such as sections 1.2 and 5.5 of the provider course accreditation standards (<http://www.comlaw.gov.au/Details/F2012L00003>).

In the current context of research and teaching demands however, the majority of academics are relatively distanced from setting, assessing and assuring learning standards at program or major level. At the same time, associate deans provide the critical interface between those on the frontline engaging students to learn and develop graduate capabilities and those driving tertiary sector policy within their universities and with external stakeholders such as the professional bodies as well as with TEQSA. In this article we examine the actual and potential role played by faculty leaders and their networks to provide the disciplinary voice in setting, implementing and assessing academic standards. As disciplines are grouped alongside related disciplines in schools, faculties or colleges, there is considerable value in building the capacity of learning and teaching leaders, in particular, in their ability to support their related informal or formal communities and networks.

While the position comes by a range of titles including associate pro-vice chancellor (learning and teaching) or dean teaching, associate deans have an important, if sometimes under-recognised, role in academic administration in the tertiary sector. Associate deans stand between program leaders or convenors at the disciplinary level, responsible for designing, delivering and managing the ongoing quality of their particular degree programs, and those at the institutional level responsible for overall educational outcomes. Typically they are charged with implementing learning and teaching policy, like that related to academic standards, across the multiple related disciplines in their school, faculty or college. They are charged with ensuring that learning standards are properly reflected in learning outcomes and assessed in the degree programs their respective institutions offer. Given the tacit nature of the knowledge around academic standards and the rate of change occurring, networks will be a significant source of peer support in this regard. Institutional executives rely on associate deans to manage the quality assurance, curriculum renewal and change at the faculty level.

This reliance is particularly the case for the standards agenda. Many universities have networks for their own associate deans to share information about what works and what doesn't. To hear the disciplinary voice, associate deans need to collaborate with those outside their institution facing a similar disciplinary context. The ALTC recognised this in the *Learning and Teaching Academic Standards (LTAS)* project and funded several inaugural associate dean meetings to assist in setting learning standards for 11 disciplines or disciplinary groups over 2010-11. Some groups evolved further into ongoing support networks. In a recent CR article Sally Kift described six good

practice guides developed under the auspices of the law associate dean network that followed their engagement in developing threshold standards for the Bachelor of Laws.

The Johns review recognised the value of networks in supporting engagement and systemic change leading to improvement in learning and teaching in higher education. It is comforting to see Office of Learning and Teaching's (OLT) recent acknowledgement.

“Academics by-and-large relate to their discipline rather than the hierarchical structure in which they operate or their institution and if the OLT is to create long-lasting change in learning and teaching, the focus needs to be on the discipline.” (*HERDSA News*, April 2012)

Some disciplines have long-running networks, such as that formed under the Australian Business Deans Council (ABDC) in 2004. Regular engagement between associate dean network members over the last five years has resulted in multiple collaborations. These range from national initiatives such as setting thresholds for accounting coursework bachelors and masters degrees under LTAS (<http://abdc.edu.au/3.74.0.0.1.0.htm>) to embedding generic skills (<http://www.graduateskills.edu.au/project/>). The network's chair, for instance, was chair of the working group that established the accounting learning standards. The ALTC discipline scholar is a member of the business network executive and continues to take a leading role in standards with his appointment as ABDC's scholar from 2011. The ALTC discipline support strategy was invaluable to the business network's activities. In contrast, the creative arts network (CALTN) is the most recent network, established (April 2012) by a merger with CreatEd. Funded by the ALTC, they plan to monitor and build capacity in learning and teaching focussing initially on standards.

Networks can build disciplinary capacity around academic standards in five ways. First, they can support new disciplines *setting* threshold learning standards. For instance, the ABDC sponsored the development of learning standards for marketing bachelors and coursework masters degrees in 2011. While the deans have taken responsibility for identifying key academics from the marketing discipline to lead the development of learning standards, the associate dean network has facilitated ongoing engagement including hosting local workshops. The law network has been involved in the development of the learning standards for the *Juris Doctor* (AQF level 9). Subsequent to learning standards established for geography and history in 2010 as part of the LTAS project involving the humanities and social sciences network, peak bodies for sociology, political science and theology have been working on their own discipline standards. Other examples are noted on the standards website coordinated by the discipline scholars (<http://disciplinestandards.pbworks.com>).

A second possible standards activity relates to *implementing* threshold learning standards previously developed. The education associate dean network (NADLATE) established in 2011 met nationally to share plans to *revise* the Master of Teaching and Master of Education in line with the learning standards developed as part of LTAS. They are also seeking to harmonise any development with the new teacher registration requirements and have established a website discussion forum for sharing information on applying agreed learning standards. Several conservatoria of music are collaborating

through the creative arts network in mapping learning standards against the curriculum offered in bachelors of music and will share their experience across the network.

Implementing the Australian Qualifications Framework (AQF) is a third focus. The revised AQF is mandated for full compliance under the TEQSA threshold legislation (December 2011) by 1 January 2015. While it recognises different fields and purposes exist such that some of the learning outcomes (knowledge, skills and the application of knowledge and skills) of each qualifications type (e.g. bachelor degree) may have more emphasis than others, the AQF requires that all of the learning outcomes must be evident for the particular level qualification. The business disciplines responded in several ways: the ABDC developed a position paper in relation to implementing the AQF (see <http://abdc.edu.au/3.77.0.0.1.0.htm> ) and the associate deans network used a recent conference to share experiences on how their respective universities have been, or intend to, respond to the revised requirements.

The fourth potential standards activity around associate dean collaboration relates to assessing achievement against published learning standards. A notable example is the collaborative project funded by the business deans, several professional bodies and subsequently the ALTC. This 10 university initiative involves (double-blind) external peer review of the accounting learning standards established under the LTAS project in 2010. Reviewers assess small random samples of student work and the related assessment requirements. Experiences of external academic and practising professionals involved in the calibration process prior to external peer review are shared with network members and mock interventions are simulated. Similarly network members are exposed to the results of benchmarking data and importantly improvements to assessment practice that have arisen.

Academic standards are well and truly on the Australian higher education agenda. Higher education providers would do well to support associate deans to build capacity, including through networking activities, since they play a key brokering role in institutions being TEQSA ready.

LTAS@UTAS: one university's strategic response to  
'Being TEQSA Ready'

Jonathan Holmes, Susan Jones and Brian Yates

The previous two articles in the 'Being TEQSA Ready' series by Sally Kift ('Being TEQSA Ready - Guiding Good Practice for Virtuous Compliance,' *Campus Review*, 25 April, 2012) and Mark Freeman & Jonathan Holmes ('Learning standards: giving airtime to the disciplinary voice,' *Campus Review*, 25 May, 2012) consider how learning and teaching networks are facilitating the integration of nationally endorsed discipline-specific graduate learning standards into degree programs.

While the Higher Education Standards Panel has yet to determine exactly how TEQSA will tackle assurance of learning standards, these articles demonstrate that many disciplines are already working through collegial networks of learning and teaching expertise – first under the aegis of the Australian Learning and Teaching Council [ALTC] and, more recently, under the federal Office of Learning and Teaching [OLT] - to determine how they will demonstrate that their graduates achieve agreed learning outcomes. This activity has the capacity to underpin a learning standards framework for the Australian sector, and will assist higher education institutions in implementing a standards-based approach to curriculum design.

Sixteen discipline-based networks are currently funded by the OLT, and the majority have an overt emphasis on developing learning standards. Amongst other current projects, the Business Deans' ten-university initiative seeks to establish peer review assessment of their graduates' capacity to meet the threshold learning outcomes defined by the Accounting discipline. These, and other, initiatives are evidence of a profound change in the tertiary sector's approach to learning and teaching standards.

The recent *Campus Review* article by Mark Freeman & Jonathan Holmes stressed the important role of associate deans in the implementation of *discipline-specific* threshold learning outcomes. It argues that, while individual unit (subject) coordinators establish expected learning outcomes for the *components* of a degree

or major, it usually falls to the associate deans to ensure that graduate attributes or, more recently, graduate learning outcomes, are integrated into degree programs and properly mapped. Such mapping then allows universities to demonstrate that a particular program meets appropriate learning standards, whether these are determined by the institution itself, by an external accrediting authority or, once a standards framework is implemented, by TEQSA.

Many universities across Australia are reviewing and developing their learning and teaching policies and procedures in preparation for the establishment of a learning standards framework. In this article, we look at a specific example of a university-wide response to this new era in quality assurance.

The case we consider here is the University of Tasmania's learning and teaching academic standards project [LTAS@UTAS]. This project is an initiative of Professor David Sadler, the relatively recently appointed Deputy Vice-Chancellor (Students and Education). Professor Sadler came to Tasmania from the U.K. where he was a Director of the UK Higher Education Academy (HEA), responsible for the UK subject centre network. He thus brought to Tasmania a wealth of experience in international approaches to quality assurance based around learning standards, and is now a member of the OLT's Strategic Advisory Committee.

As ALTC Discipline Scholars, we (Jonathan Holmes, Sue Jones, and Brian Yates) led discipline-focused projects that developed nationally agreed threshold learning outcomes for science (Yates and Jones) and creative and performing arts (Holmes). In late 2011 we were appointed UTAS Learning and Teaching Professors, and we now lead LTAS@UTAS.

The aim of LTAS@UTAS is to establish a comprehensive approach to academic standards, expressed as degree learning outcomes, across all faculties and degree programs. The University has been guided by its recent experience undergoing one of the earliest university audits by TEQSA in 2011 under two main themes – internationalisation and learning outcomes.

During the preparation of the UTAS audit portfolio in 2010-2011 it was recognised that substantial headway had been made to ensure that learning outcomes were clearly embedded at the unit (or subject) level in undergraduate awards: this had been assisted by the adoption of a University-wide criterion referenced assessment policy in 2007. Between 2008 and 2010 considerable work was completed to ensure that assessment tasks were clearly linked to those unit learning outcomes.

Nevertheless, as the TEQSA Audit Report noted, the mapping of subject level learning outcomes to degree level learning standards is patchy. It is mainly where degree programs are externally accredited that there has been a conscious effort to provide evidence that learning standards have been met. [Tertiary Quality Assurance Agency (2012). *Report of an Audit of the University of Tasmania*, March 2012, p.3]

Two points are worth noting. First, a learning outcomes-driven approach to degree program delivery is still in its relative infancy in Australia. Second, as numerous researchers focusing on this issue have attested, assessing learning standards and providing evidence that they have been achieved represent complex challenges confronting academics worldwide. This is acknowledged, for instance, in the TEQSA discussion paper *Developing a framework for teaching and learning standards in Australian higher education and the role of TEQSA*. [June, 2011]

What we do have in Australia is a solid range of discipline-based learning standards that have been endorsed by the peak discipline bodies. And, in the case of UTAS these are directly applicable to a surprisingly large number of our degree programs. The approach adopted by LTAS@UTAS is to work with the published learning standards where they exist and to establish a direct link to learning outcomes of components of degree programs, including majors, to demonstrate how they build student development to identified graduate learning outcomes.

Ultimately the aim is to establish how these might be articulated both at a threshold and at more advanced levels of student achievement – a process that should be assisted by the existing criterion referenced assessment policy that links levels of achievement in assessment tasks to identified learning outcomes, at least at the level of individual subjects.

In the first phase of the project, then, we are working with the faculty learning and teaching leaders and program and subject coordinators to determine how best to meet the University's Learning and Teaching Strategic Plan. A primary aim has been to establish the extent to which the faculties have already begun the process of mapping their curricula to enable graduate threshold learning outcomes to be integrated into degree programs and discipline majors and, where possible, to identify discipline specific exemplars that can be incorporated into a University good practice guide.

However, crucially, we must garner the support of our teaching academics through emphasising the potential of a standards-based framework for improving their teaching and their students' learning outcomes. This must not be regarded merely as a 'top-down' bureaucratic imposition on time-poor academics, especially in the era of ERA. That said, for many disciplines the demands of external accreditation already mean that the academics involved have to undertake curriculum reviews at regular intervals: the UTAS project, if finessed successfully, will enhance the capacity of those disciplines to deliver meaningful accreditation documentation.

For academics more generally, the key will be to demonstrate how a learning outcomes-focused approach to curriculum design will not only improve their teaching but their students' learning experiences as well. And for the University, a comprehensive curriculum mapping of this order has the capacity to give real substance to the UTAS Academic Standards Framework and will allow the University to demonstrate a systematic and enhancement driven approach to the new TEQSA Teaching and Learning Standards Framework.

The authors are all Learning and Teaching Professors at the University of Tasmania and ALTC Discipline Scholars, originally on the ALTC Learning and Teaching Academic Standards project. Jonathan Holmes is Emeritus Professor in the Faculty of Arts; Susan Jones is Professor of Zoology in the Faculty of Science, Engineering and Technology; and Brian Yates is Professor of Chemistry in the same Faculty as well as Deputy Chair of Academic Senate at UTAS.



## **Being TEQSA ready – Disciplines doing more with Standards.**

Iain Hay and Brian Yates

As a result of the ALTC's Learning and Teaching Standards (LTAS) project, disciplines across Australia have available to them eleven models of carefully considered graduate standards (expressed as threshold learning outcomes) and the processes by which they were devised (see <http://disciplinestandards.pbworks.com/>). A broad range of additional disciplines has now indicated interest in developing their own standards and several have already gone on to prepare their own Standards Statements (e.g. Political Science, Sociology, Theology), realizing ALTC CEO and now TEQSA Chief Commissioner Carol Nicoll's "hope that this initial project will prove so successful that it will be the foundation for the initial development of learning and teaching standards across all disciplines". The national network of Discipline Scholars is grateful to the Office for Learning and Teaching (OLT) for continued support of this work.

The pattern of standards growth in Australia seems to match that followed in the UK where although the QAA (Quality Assurance Agency for Higher Education) Benchmark Statements were downgraded from a regulatory to a developmental tool, there has been continued voluntary expansion of benchmarks into those subjects not initially covered. Indeed, demand was such that the QAA had to introduce a Benchmarking Recognition Scheme. Such expansion is, of course, not all for unselfish reasons. Standards-setting is viewed in some 'emerging' disciplines as a means of legitimizing their existence or in other fields with permeable boundaries as a strategy for shoring up their position in academic turf wars.

Although the LTAS Statements are available for quality assurance under TEQSA, the place of the Statements in the new regulatory system remains uncertain, a point made earlier in several of these 'Being TEQSA ready' articles. However, even without regulatory clarity there are various good uses to which standards can otherwise be put – what British commentator Emma Wisby calls "developmental offshoots". During the LTAS formulation of discipline standards, stakeholders suggested the standards offer promise for a range of constructive uses including: enhanced program design and curriculum development;

linguistic alignment of assessment, outcomes and professional requirements; discipline 'stocktaking' as a foundation for future review; benchmarking for reciprocal study abroad; promoting the discipline to domestic and international students as well as to the wider community; and as a 'talking aid' in conversations with prospective students, parents, career counsellors, employers, politicians, professional bodies, and scholars in allied disciplines. Several of these suggestions have already been taken up in some disciplines. For example, the Geography Standards Statement provided foundational material for a recent publication extolling the virtues of studying in Australia that was circulated internationally to thousands of prospective students and career counsellors. These are applications that point to the 'value adding' potential of Standards Statements and to the merits of more fully exploring their alternative uses.

Moreover, because TEQSA's specific regulatory processes have not yet been finalised, discipline communities aiming to establish their own standards can focus, in the short term, on the representativeness and integrity of standards themselves and on their prospective role in quality *improvement* (as opposed to quality assurance). There is unquestionable value in being able to focus attention on students' learning outcomes, without trying to anticipate ways of massaging and managing standards for a specific regulatory agenda.

The unburdened focus on outcomes offers an additional benefit. At consultation sessions conducted across the country as part of the LTAS work, stakeholders from 'outside' the academy noted their appreciation at being asked to contribute meaningfully to the definition of the discipline, the outline of career opportunities, and the specification of threshold learning outcomes. It is the emphasis on educational *outcomes*, rather than educational processes – regarded as arcane by many outside the university sector – that opens up this opportunity. The standards-setting process introduces a valuable medium for all parties with an interest in a discipline to meet on an equal footing and discuss the nature of, and educational expectations for, the discipline. These kinds of exchange offer foundations for enduring engagements between those within and outside the higher education sector.

The focus on the disciplines has in some cases fostered stronger leadership at the academic level. In chemistry, the focus on developing threshold learning outcomes specific to this discipline led to a gathering of Heads of Chemistry from across Australia. Together with external participants, academics are being encouraged to take ownership of their discipline at the undergraduate university level. Workshops in a number of science disciplines have encouraged people to think about what makes graduates from their discipline unique.

Looking at the bigger picture, one of the outcomes of the LTAS project is that it appears to be stimulating activity in the disciplines on at least two levels: one is at a more grass-roots level and includes the academics primarily involved in teaching the discipline, while the other is at the level of the professional societies. As an example of the former, a number of science disciplines received funding from the ALTC to develop stronger collegial networks. The threshold learning outcomes (TLOs) developed by Chemistry have prompted a vigorous discussion in the Chemistry Network about academic standards in the discipline, and an acknowledgement that implementation of the TLOs represents a significant challenge. Meanwhile at the level of the professional society, the TLOs have stimulated discussion about the accreditation of degree programs. At this level, the TLOs have provided a validation for moving towards an outcomes-based approach to accreditation and a framework for thinking differently about our expectations of chemistry graduates.

A real challenge for the future of a discipline-focussed approach to standards development and implementation is one of resources. Many of the peak discipline bodies which might take the lead in establishing standards operate with a voluntary secretariat and executive, drawn predominantly from already stretched academic communities, and typically have very limited budgets. If these bodies are to include in their future workload the maintenance and review of threshold learning outcomes to satisfy quality assurance measures within universities, some form of support for those organisations will be necessary and warranted. That seems unlikely under current fiscal circumstances. The alternative, which might involve government agencies taking a more active role overseeing development and maintenance of the standards statements as has been the case in the UK, is not only likely to be more expensive but also moves well away from the Government's

laudable stated ambitions that standards-setting be a collegial, academically autonomous, peer-reviewed process, giving pre-eminence to the disciplines.

The LTAS Project generated a great deal of goodwill as 'discipline communities' were brought together to discuss educational outcomes in Australia's universities. There is no question that the Federal government's stated hope that standards-setting be a collegial, academically-driven activity was achieved within that project. But without continuing support for disciplines to devise and implement helpful new standards and if the standards are left to languish, a great deal of academic and community goodwill may be lost.

**Iain Hay** is Professor of Geography at Flinders University and President of the Institute of Australian Geographers. He is also ALTC Discipline Scholar for the Arts, Social Sciences and Humanities. **Brian Yates** is a Professor in Chemistry and Deputy Chair of Academic Senate at the University of Tasmania. Together with Susan Jones, he is an ALTC Discipline Scholar for Science.