Guidance Note: *Academic Quality Assurance*

Version 2.2 (11 October 2017)

Providers should note that Guidance Notes are intended to provide guidance only. They are not definitive or binding documents. Nor are they prescriptive. The definitive instruments for regulatory purposes remain the TEQSA Act and the Higher Education Standards Framework as amended from time to time.

What is academic quality assurance?

Broadly defined, academic quality assurance is a demonstration or verification that a desired level of quality of an academic activity has been attained or sustained, or is highly likely to be attained or sustained. 'Academic activities' generally include teaching, learning, scholarship, research and research training for higher degrees by research. The mechanisms (systems, processes, activities) employed to verify such attainments are typically known as quality assurance systems, quality systems or even just 'quality assurance'. In the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework), academic quality assurance is called Institutional Quality Assurance. While quality assurance processes are equally applicable to any aspect of a provider's operations, not just academic activities, this note is primarily concerned with academic activities.

There are at least two essential prerequisites to quality assurance. The first prerequisite is that the characteristics of quality that are being sought need to be defined. These may be inputs (e.g. entry standards, staff qualifications), processes (cycle time for an enrolment process or time to get feedback from assignments), outputs (completion rates) or outcomes (knowledge and skills acquired, including life-long learning skills). The second prerequisite is that a judgement of attainment needs to be made. This may involve quantitative measures or qualitative judgements or both. A presupposition of academic quality assurance is that judgements about academic quality are made by someone (or some process) that is competent to do so. Many types of quality assurance are used in higher education.

Although not necessarily a feature of quality assurance as defined above, the higher education sector generally sees 'continuous improvement' as an integral part of academic quality assurance. Continuous improvement is typically based on an on-going reflective feedback cycle involving monitoring, review and consequent evidence-based improvements both of courses and of major controls on academic quality such as assessment policies and procedures. 'External referencing' is another widely accepted feature of quality assurance in higher education. This means the provider comparing internal courses and quality controls with others within or beyond the institution. 'Benchmarking', 'moderation' and 'peer review' are common methods of external referencing used for particular purposes.

The effectiveness of a provider's academic quality assurance processes is seen by many to be an important determinant of a provider's reputation in the sector. It is certainly a key determinant of TEQSA's confidence in a provider's operations.

Relevant Standards in the HES Framework

In essence, the entire HES Framework and the Standards contained therein are concerned with the quality assurance of a provider's higher education operations. Most of the Standards are concerned directly or indirectly with academic matters. Some of the Standards are quite detailed and technical (e.g. staffing qualifications and learning outcomes and assessment), some are overarching (institutional quality assurance) and others are higher level still and even more overarching (corporate and academic governance).

This guidance note is concerned primarily and specifically with the Standards for institutional quality assurance (Sections 5.1-5.4). These relate closely to the Standards for academic governance, and to those for corporate governance in so far as the governance Standards are concerned with monitoring and accountability for the quality of higher education at corporate level. There are links to enabling information management systems as well (see Standard 7.3.3). The Standards for course approval and accreditation (5.1.1-5.1.3) cross refer (via 5.1.3a) to the more detailed Standards that are applicable to course accreditation (see 'Threshold Standards - Provider Course Accreditation Standards' as defined in the preamble to the HES Framework 2015 Legislative Instrument).

Intent of the Standards

The Standards encompass four particular areas of academic quality assurance of a provider's operations:

- Section 5.1 Course Approval and Accreditation
- Section 5.2 Academic and Research Integrity
- Section 5.3 Monitoring, Review and Improvement, and
- Section 5.4 Delivery with Other Parties.

The intent of Section 5.1 is to ensure that all courses of study leading to a regulated higher education qualification are subject to a rigorous internal approval process (whether or not the provider has self-accrediting authority from TEQSA). The approval process is to be applied consistently by the provider for all approvals and re-approvals. In the case of a provider without self-accrediting authority, the internal approval process is an essential prerequisite for an application to TEQSA for an external course accreditation. TEQSA will not accredit a course of study that has not first been subject to a rigorous and credible internal approval process.

The Standards require that a provider's internal approval processes involve rigorous oversight of course proposals by participants in the provider's organisational academic governance processes, at arm's length from those involved in delivery of the course of study. Demonstration that a proposed course of study will meet the requirements of the HES Framework and that sufficient resources will be available is also required. In essence, Section 5.1 constitutes an organisational framework for a consistent internal course approval process. As a consequence, 5.1 invokes (via 5.1.3a) the Provider Course Accreditation Standards that outline the detailed requirements of the HES Framework in relation to quality assurance of a course of study.

Section 5.2 encompasses potential risks to academic and research integrity[1] by focusing on maintaining an effective policy framework, taking preventative action in relation to predictable risks, guiding students toward good practices and preventing lapses in integrity in any delivery arrangements with other parties. This section links to institutional monitoring of any lapses and consequent corrective actions in relation to academic and research integrity (see 6.2.1j, 6.3.2d, 7.3.3c).

The intent of Section 5.3 is to focus on a provider's mechanisms for monitoring and reviewing its higher education activities, and engaging in consequent reflection to bring about evidence-based improvements (i.e. continuous improvement). The Standards require a fundamental, comprehensive review of courses and course delivery at least every seven years, and speak to the scope of such reviews. These periodic overall reviews of courses of study are expected to be informed and supported by more frequent monitoring of course performance at unit level, and a provider's review activities are expected to encompass external referencing against comparable courses (including student performance data) and to be informed by student feedback. The Standards in Section 5.3 link to the Standards for academic and corporate governance in so far as there is an expectation that a provider's monitoring and review activities related to Domain 5 will inform corporate awareness and decision making.

The intent of Section 5.4 is to place an explicit requirement on the primary registered provider for quality assurance of delivery arrangements with other parties. A registered provider must be able to demonstrate how it ensures that course delivery though third parties meets the Standards.

Risks to Quality

Effective quality assurance systems help a provider to validate any claims it may make about the quality and standing of its educational offerings. Without such mechanisms, courses of study may not be subject to sufficient rigorous scrutiny to be credible, they may not be refreshed for the contemporary environment and it will not be possible to make credible evidence-based claims comparing offerings with other courses and providers. Without adequate monitoring and data gathering, evidence-based improvement will be precluded and courses will be subject to ad hoc changes and/or lapsing into irrelevance or obsolescence. Failure to attend sufficiently to feedback from students will lead to adverse student experiences and raise potential reputational and market risks. Insufficient attention to the integrity of a provider's operations will call into question the credibility and authenticity of any qualifications issued. In larger providers, monitoring, review and improvement of course quality and course delivery will need to occur at multiple levels, including at course, academic unit and provider levels.

Providers who fail to pay sufficient attention to maintaining academic and research integrity place their entire operation at risk. Without continuing due diligence in this respect, lapses are inevitable with, at best, attendant reputational risk to the provider and to Australian higher education more generally, which TEQSA is bound to protect and enhance. A reputation once lost may be difficult to regain; so too might a financial position.

Section 5.4 addresses and seeks to avoid two particular areas of potentially serious risk concerning arrangements with other parties. The first is where students undertake temporary experiences with another party, such as on a work placement, where without exercise of care by the registered provider, the students could be unreasonably isolated from the provider or its learning system and/or subject to indifferent supervision in the placement,

[1] 'Research integrity' has come to be identified separately from other academic integrity in common parlance.

resulting in poor learning outcomes and/or loss of wellbeing. The second set of risks concerns arrangements with other parties to deliver a more substantial part of a course or even an entire course, e.g. via a third party with a remote campus, if the primary provider intends to defer all responsibilities for quality assurance to the delivery partner. This too represents an unacceptable risk to students; the primary registered provider must be able to demonstrate that it maintains quality assurance of all of its operations, including assuring itself of continuing compliance with the requirements of the HES Framework, irrespective of the involvement of other parties.

What TEQSA will look for

This part of the guidance note covers the full extent of the Standards, and corresponding evidence that TEQSA may require, in relation to institutional quality assurance.

For new applicants seeking initial registration and course accreditation, TEQSA will require evidence to be provided in relation to all relevant Standards.

For existing providers, the scope of Standards to be assessed and the evidence required may vary. This is consistent with the regulatory principles in the TEQSA Act, under which TEQSA has discretion to vary the scope of its assessments and the related evidence required. In exercising this discretion, TEQSA will be guided by the provider's regulatory history, its risk profile and its track record in delivering high quality higher education.

TEQSA's case managers will discuss with providers the scope of assessments and evidence required well ahead of the due date for submitting an application.

The evidence required for particular types of application is available from the Application Guides on the TEQSA website.

Providers are required to comply with the Standards at all times, not just at the time of application, and TEQSA may seek evidence of compliance at other times if a risk of non-compliance is identified.

TEQSA acknowledges the diversity of providers and offerings in the higher education sector and will vary its approach to assessment of the quality assurance mechanisms of providers accordingly. Nonetheless, the Standards are applicable to all providers and for the most part the requirements are largely self-evident and are expected to be reflected in a provider's normal operations.

In relation to course approvals, TEQSA will need to be satisfied, irrespective of the scale and nature of the provider, that there is a rigorous process for scrutiny of course proposals that is applied consistently, is at arm's length from those who deliver the course of study, and is capable of competent relevant academic judgement appropriate to the level of study. This should involve external experts and input from industry and/or professional bodies where relevant, for example through a course advisory committee. A demonstrated capacity to conduct course approvals across a range of fields of study, at different levels of qualification and through a number of cycles of review, will build TEQSA's confidence in the provider's processes.

In so far as the internal course approval process canvasses the Provider Course Accreditation Standards, TEQSA will take into account the provider's track record of meeting those Standards in determining the scope of its assessment. In some cases TEQSA may consider, through the provider's case manager, a review of a provider's course approval process as a stepping stone in a journey to seeking self-accrediting authority. TEQSA may

also consider a streamlined approval of cognate courses that share a proven internal approval process.

The Standards for academic and research integrity (Section 5.2) require a number of specific elements to be addressed. TEQSA will need to see evidence that those elements are in fact addressed (unless they are not applicable to a particular provider, e.g. research is not carried out). The more those elements are being addressed in a coherent, systematic way and the more a strong culture of maintaining integrity is evident across a provider's operations (whether through predicting risks and/or establishing preventative measures), the more confidence TEQSA will have in this respect.

As with the other Standards for quality assurance, there are specific requirements for monitoring, review and improvement in the Standards that TEQSA requires to see demonstrated. As a provider becomes more experienced, TEQSA would expect to see more examples of completed cycles of review with implementation of demonstrable improvements arising from the reviews; i.e. a developing culture of continuous improvement. Providers should note that the Standards require certain types of external referencing of performance and TEQSA will need to see that this is occurring and how it informs improvement cycles and, where relevant, the marketing and representation of the provider. In particular, TEQSA will want to see how a provider is referencing its performance externally, especially in relation to student performance and outcomes, whether via peer review, benchmarking or similar mechanisms (including peer review of assessment, the results of which should also be considered within course reviews). TEQSA will also want to see how the findings of reviews and external referencing lead to improvements in teaching and learning, how these findings feed back to corporate decision making and monitoring (i.e. corporate and academic governance) and that consequential changes are traceable to revised corporate positions e.g. in changed policy frameworks, admission criteria, marketing information.

Where TEQSA is required to consider delivery arrangements with other parties, the provider must be able to demonstrate to TEQSA that it remains fully accountable for quality assuring those arrangements and that there are effective mechanisms in place to do so. TEQSA may modulate its approach in this respect based on a provider's record of success.

Scope of assessments

The effectiveness and maturity of a provider's internal quality assurance mechanisms, in combination with their links to effective academic and corporate governance, are essential to TEQSA's confidence in the quality and integrity of a higher education provider's operations.

If, as a result of looking at the provider's internal academic quality assurance arrangements, including the requirements of relevant related Standards, (e.g. academic governance, corporate governance, Provider Course Accreditation Standards), TEQSA is satisfied that the provider's institutional quality assurance arrangements are robust, effective and sustainable, this may allow TEQSA to reduce its evidence requirements for other Standards or for subsequent regulatory activities. On the other hand, if concerns are raised in relation to the provider's internal assurance mechanisms, this may require TEQSA to probe other areas of the provider's operations in more detail where the provider is not already doing so effectively as part of its own routine quality assurance.

The adequacy and maturity of a provider's internal quality assurance processes for approval of courses will also have a direct bearing on any application the provider may make for self-accrediting authority (see Part B2 of the HES Framework: Criteria for Seeking Authority for Self-Accreditation of Courses of Study). Among other things, the criteria for self-accrediting authority will look for maturity of cycles of review in the provider's monitoring and review processes. This would also be true of a provider seeking 'University' status.

Resources and references

AUQA Occasional Publication (2004), *Quality Frameworks: Reflections from Australian Universities*.

Office for Learning and Teaching Resource Library[2], <http://www.olt.gov.au/resources/good-practice>.

Quality Assurance Agency (2014), *UK Quality Code for Higher Education*[3], <http://www.qaa.ac.uk/assuring-standards-and-quality >.

Resources for enhancing quality available on the Academic Quality Agency (New Zealand) website, <http://www.aqa.ac.nz/enhancing-quality/thematic-resources>.

TEQSA (2016), *Explanations of terms in Part A of the HES Framework 2015*, <http://www.teqsa.gov.au/explanations-hes-framework-terms>.

TEQSA welcomes the diversity of educational delivery across the sector and acknowledges that its Guidance Notes may not encompass all of the circumstances seen in the sector. TEQSA also recognises that the requirements of the HESF can be met in different ways according to the circumstances of the provider. Provided the requirements of the HESF are met, TEQSA will not prescribe how they are met. If in doubt, please consult your TEQSA case manager.

Version #	Date	Key changes
1.0	July 2014	
2.0	13 April 2016	Updated for the HESF 2015 and made available as beta version for consultation.
2.1	19 August 2016	Incorporated feedback from consultation, including on quality controls, monitoring and peer review of assessment.
2.2	11 October 2017	Addition to ‘What will TEQSA look for?” text box.

[2] This library contains a collection of higher education learning and teaching materials flowing from projects funded by the Commonwealth of Australia, including those from the Australian Learning and Teaching Council.
[3] This document sets out expectations for providers of UK higher education.