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Australian University Quality Agency (AUQA)
Auditor's Meeting and at the AUQA Forum,
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Acronyms fly around the pages of the higher education universe –HEPs, GAAs, NSAs, QA, DEEWR etc ... now joined by TEQSA (no, it's not a Mexican toast!). What is it, and what will it mean for Australian theological education? This paper seeks to trace the path towards this new national body, and focus on a particular project of the *Council of Deans of Theology* related to it, the Threshold Learning Outcomes project (*a separate paper is available on this*).

From 'fit for purpose' to a 'standards' focus

Since the formation of the *Australian University Quality Agency (AUQA)* in 2000, public Higher Education in Australia has been viewed in terms of a 'fit for purpose' model - that is, an institution has been audited in terms of how it is performing against its own goals ('quality assurance'). For private higher education bodies (which have multiplied rapidly since 2000) the focus is on registration of the institution and accreditation of its courses (every five years) - a regulatory rather than quality assurance approach (as most theological institutions are well aware!).

When FEE-HELP was introduced in 2005, and made available to private providers, one condition was that each Higher Education Provider (HEP - a name originating in the *Higher Education Support Act, 2003*) go through a QA audit, and AUQA has been increasingly occupied in this task. Nearly all Australian theological HEPs have now undergone an AUQA audit: theology has gained considerable respect in AUQA itself, and also lost much of its wariness about the wider world of Australian higher education. Indeed, FEE-HELP, and its consequential reporting requirements, has now been so generally internalised in the culture of most theological colleges that its loss would probably provoke a crisis scarcely imaginable only five years back. But back to the story.

The first Cycle of AUQA university audits considered each institution as a whole, and selected disciplines within it: this was completed in 2005. Cycle 2 audits, on the other hand, have been 'thematic' - one is 'internationalisation' (e.g. off-shore campuses), the other nominated by the university. These audits are now over half-way through, and a similar process will apply to private HEPs from 2012 (when the MCD is set down for such).

The Australian Government, through the *Ministerial Council on Education, Employment and Training (MCEET)*, which draws together the relevant state and federal ministers - it has had various names) has steadily developed a series of National Protocols and Guidelines to given higher education, which since 2004 have required all accredited HEPs to comply with (governance requirements are those which most affect theological education).

The Bradley Review of Higher Education made a series of recommendations, most of which have been adopted by the Australian Government. A much greater student-centred focus

was called for: the ‘caps’ on the number of Commonwealth Supported Places (the old HECS) on any university will be removed, meaning that student choice will affect course offerings, and significant effort will be given to increasing access and realistic participation opportunities for disadvantaged students – a major ‘equity’ concern.¹

The major policy outcome was the Australian Government’s 2009 policy document, *Transforming Australia’s Higher Education System*. This moves the focus from ‘fit for purpose’ to ‘standards’, and applies across the whole sector, not just the universities. It is also envisaged that there will be much greater articulation possible between the Vocational Education & Training (VET) and HE sectors.

A ‘standards’ focus – what will it mean

The term ‘standards’ is not much liked in higher education, since it is heard to imply ‘top-down’ imposition and compliance. But the new policy looks for a system that respects the “traditions of collegiality, peer review, the pre-eminence of disciplines and, especially, academic autonomy”. It sets out five ‘standards’, driven by the overall notion that education is the way forward for national prosperity, and the goal of making Australia the best-educated and best-skilled nation by 2020:

1. **Higher Education Provider registration standards**, via the National Protocols. Registration will take into account equity matters such as ‘a strong sense of social responsibility’, ‘an internal culture of respect and trust, including indigenous Australians, multi-culturalism and pluralism, and for learning’, ‘social and cultural support for students risk’ (from the *Transforming* document).
2. **Academic programmes and qualification standards**, via the *Australian Qualifications Framework* (AQF, currently under review in response to the Bradley Report);
3. **Information standards**, i.e. the use of appropriate data to track student cohort progress, attrition and completion, course reviews and the like. Equity issues are again to the fore – the Government’s aim by 2025 is for 40% of 25-34 year olds (today’s 10-19 year olds) to have a bachelors’ degree, with 20% of undergraduate students being from disadvantaged backgrounds by 2020;
4. **Teaching and learning standards** – which is why the *Australian Learning & Teaching Council* (ALTC) is running a *Learning and Teaching Academic Standards* (LTAC) project.
5. **Research standards**, via the *Excellence in Research* (ERA) initiative.²

To put these into practice, in March 2009 the Australian Government Minister for Education, Julia Gillard, announced the establishment of the Tertiary Education Quality and Standards Agency (TEQSA). On the quality assurance side it will take over the work of AUQA; on the registration and accreditation side, the role of the nine Government Accrediting Agencies (GAAs). In their submissions to the Bradley Review, ANZATS and

¹ The categories of disadvantage listed as equity concerns for Australian higher education are: disabled, low socio-economic status (SES), non-English speaking background (NESB), indigenous, rural and regional background students. Information on these students has grown rapidly in the universities, but would seem to be scarce in the theology sector.

² These ‘standards’ were clarified in an excellent AUQA Forum plenary presentation from Professor Christian Ewan, director of the ALTC’s LTAC project. She mentioned the *Council of Deans of Theology’s* TLO project in giving an example when answering a question, and that ALTC was glad to assist it.

several theology HEPs supported the establishment of a single, national, quality assurance and registration / accreditation body, especially in view of the inconsistencies between the (GAAs). Theological education leaders have thus given a general welcome to the announcement – but details as to what it will mean in practice are still sketchy.

As part of discussion on the desirability of TEQSA, one participant summed up a group discussion among AUQA Auditors by stating that what is needed for Australian higher education to be, and be seen to be, effective, is a *national* system that

- has a *risk* focus (i.e. does not try to assess everything, but focuses on risks: e.g. students doing badly, underperforming faculty, institutional loss of reputation – graduates recommending to friends that they study somewhere else);
- is *evidence based* (not just anecdotal, but using systematically gathered data);
- focuses on what *value is added* through the education process (i.e. takes into account where students start, though minimum outcomes are important); and
- is *acceptable to all parts of Australian Higher Education* (the universities are resisting the idea of accreditation, while NSAs are put off by a heavy compliance burden).

This statement seemed to gain a widespread ‘yes!’ response, and (as it transpired) a number of member’s papers at the AUQA Forum addressed these points.

David Hazlehurst is the key DEEWR public servant in higher education: in addressing the AUQA Forum he noted that if the AUQA audit Cycles were Phases 1 and 2 of the ‘education revolution’, then TEQSA is Phase 3. This comment was warmly welcomed as indicated an evolutionary rather than revolutionary approach to change. He also noted the importance of the risk-based approach being ‘proportionate’, so that the compliance burden is made only as heavy as is necessary.

On 7 July it was announced by Minister Simon Crean that the interim CEO of TEQSA will be Mr Ian Hawke, Deputy Chair of the Board of AUQA, who joins Professor Denise Bradley who is the interim Chair of the Board of TEQSA, having chaired the review of higher education that bears her name. They not only have wide experience of higher education, but also of the quality assurance role of AUQA, which gives continuity in that role, and offers assurance of fair treatment to institutions engaged in theological education.

So - what is TEQSA?

TEQSA, according to Minister Julia Gillard’s March 2009 announcement, was to start operations from January 1, 2011 (1/1/11!). This date is now considered to be impossible, not least because the legislation is yet to come to Parliament, the Minister of Education recently changed, and an election is due soon - but a start by 2012 is likely.

In the opinion of those who spoke to the matter, Julia Gillard, Kim Carr and Simon Crean (the new Minister) are firmly committed to TEQSA, understand in detail the issues involved, and (of great importance) are committed to its operations being fully independent of the Minister, rather than regulated by him/her. It seems also to be bilaterally uncontested.

Each of the TEQSA initials is significant:

- TE – the new body will cover ‘tertiary’ education, i.e. the public universities (of which ACU, Charles Sturt, Flinders, Murdoch and Newcastle have theology programmes), public institutions such as TAFEs who offer tertiary diplomas and degrees, and the diverse range of private HEPs, whether Self-Accrediting (ACTh, MCD, Notre Dame) or Non-

SAI (Alphalink, Avondale, Christian Heritage, Moore, the Tabor and Harvest colleges, SCD, Wesley Institute – all FEE-HELP theological HEPs – and others).

- Q – the new body will take over all the ‘quality’ audit work of AUQA, which despite the ‘U’ in its name was authorised by DEEWR to do quality audits of all HEPs (and most Cycle 1 audits of theology HEPs have now taken place).
- S – is for ‘standards’: the new body will in time assume the work of the nine state / territory Government Accreditation Agencies, which are currently being reviewed by AUQA in three groups of three: this will be completed by the end of 2010, and offer advice on the transition.
- A – TEQSA will be a statutory Commonwealth ‘agency’, which takes over the GAAs’ work, using the Commonwealth’s Corporations power, rather than coordinating them through an Inter-Government Agreement (IGA). (What reserve powers state Ministers might retain in relation to accrediting a new HEP is unclear.)

Achieving agreed, publically understandable ‘standards’ is the aim. This is now being put as an ‘outcomes-focussed’ approach, with minimal additional compliance loads being placed on HEPs: but ‘quality assurance’ and ‘accreditation’ functions do not sit easily together.³

Moving towards an ‘outcomes-focussed’ approach

Richard James (Melbourne University) and Peter Ewell (from the USA) made excellent presentations on an ‘outcomes approach’, including these concepts, which I found helpful:

1. Distinguish between *minimum* standards (a ‘regulatory’ / summative approach) and *aspirational* standards (‘what we are proud of’ / formative approach).

In this way the focus can be on what a HEP wants to communicate to the constituent communities it serves (e.g. the churches, mission agencies) and the wider public, and blend quality assurance and accreditation with some integrity.

Measuring aspirational standards is impossible, he (and others) argued: e.g. how can it be shown that ‘Graduates of St Z School of Theology will be models of pulpit and platform ministry’? Minimum i.e. *threshold* standards, must be measurable, however - which raises questions about how this is done.

2. Distinguish between standards for *entry, delivery / process, and attainment*.

Entry standards are the least important, and the easiest to measure, whether by TER score, interview, portfolio of work, probation etc.⁴

Delivery standards are the main business of QA audits, focussing on the processes of learning, teaching and research which are the core business of any HEP.

³ In answer to questions, David Hazlehurst indicated that concern about blending QA and regulatory facets had been well heard in Canberra, and that the administrative structure of TEQSA is needed to avoid any one person holding all the higher education strings – a ‘super HE bureaucrat’: a ‘Commission’ structure is one possibility, with a board of Commissioners.

AUQA has conducted four ‘combined audits’ of re-accreditation and quality assurance, and the *Australian Lutheran College* AUQA audit will combine with an MCD ‘accreditation’ process.

⁴ Some presentations at the Forum outlined the work being done by ‘pathways’ institutions such as the Navitas group in offering courses which bridge VET/school and higher education.

Such work is relevant to the provision not only of access, but meaningful participation and course completions to students from

Dr Mark Hay, an AUQA auditor who taught Theology at Pietermaritzburg in South Africa under apartheid, spoke clearly to the challenges which equity issues raise for higher education.

Attainment standards are what matter most in terms of a HEP's reputation, and Richard suggested that they can be understood in three main categories:

- generic outcomes applying to any tertiary award – a student's 'graduate-ness';
- generic outcomes for the discipline / area concerned; and
- specific outcomes for the discipline / area concerned.

Richard allocated 30%, 50% and 20% to each as a rough guide – for theology, I'd make this something like 30 / 40 / 30, with 30 / 30 / 40 for a ministry degree.

One practical idea as regards 'attainment' outcomes for a degree as a whole is to identify 'capstone' units, whose moderation would form a major part of a student's 'graduateness' being measurable – with assessment methods appropriate to this. Presentations from accountancy and creative arts people, for example, noted that they had capstone units as internships or projects, where feedback from the placement played a significant role. Such an approach is commonly used as regards an Honours degree, in some Ministry degrees and diplomas, and could be further developed for a pass Theology degree.

These disciplines had also worked up overall tables for major award categories, under the 'knowledge / skills / capabilities' framework: thus for accountancy -

	<i>Communication</i>	<i>Critical judgement</i>
<i>Bachelor</i>	With standard client	Standard audit work
<i>Masters by coursework</i>	Over a complex case	Technical audit work
<i>Research masters</i>	Advanced projects	Audits needing creativity

The creative arts matrix included columns on 'Practical response to a commissioned project or performance', with both individual and collegial dimensions. I found these very helpful in suggesting ways to avoid minutiae in forming TLOs.

The Threshold Learning Outcomes project of the Council of Deans of Theology

Which brings us to the *Learning and Teaching Academic Standards* project of the *Australian Learning & Teaching Council*. This is an attempt to have different disciplines consider the minimum ('summative') Threshold Learning Outcomes (TLOs) needed for a graduate, but seeking to take in the 'levels' (pass / credit etc.) and 'ethos' issues implied in seeking more aspirational ('formative') outcomes as typical of graduates.⁵ The ALTC project is the first step of a longer process, which will include the negotiation of protocols and processes for demonstrating that standards are being met – and what happen when they are not.

Several ideas raised in discussion should also be noted:

- attainment TLOs must be related to the work of professional accreditation bodies (accountants, medics, lawyers etc.);
- all disciplines should have broad as well as specific TLOs – as Mark Hay put it, "can a Bachelor of Business graduate *not* have developed as a person?"
- TLOs will be discipline-specific – those for a geography graduate will look quite different to those for a nursing, IT or education graduate.

⁵ According to Peter Coaldrake of *Universities Australia*, in his opening remarks to the Forum, TLOs are of "critical importance" in the TEQSA future: they will be "first cab off the rank when it comes to performance-based funding" (summarising Julia Gillard's words).

- equity concerns are often perceived to lower standards – how should this be approached?⁶

An issue raised several times in the Forum was how the moderation of unit standards, generally observed closely across higher education by check-marking, grade distribution checks, student evaluations etc., related to an overall sense of TLOs for a degree as a whole. This is especially the case when a degree is less skills oriented: as Professor Ewan put it, ‘when I studied medicine, we all knew what we were preparing to be – doctors; but though I thoroughly enjoyed my 24 units in anthropology, I did not think of myself as becoming an anthropologist!’ It struck me that this might assist in differentiating degrees in Theology (whose graduates should indeed be theologians!) and Ministry (whose graduates should be equipped to begin ministry). This is related to the ‘capstone unit’ concept noted above.

The *Council of Deans of Theology*, at its meeting in May, decided that – in the light of what had been uncovered in the (ALTC-funded) *Uncovering Theology* project, the just-commenced *Transforming Theology* project (also ALTC-funded), and the opportunity to ‘stay ahead of the game’, established an ad hoc Steering Committee to draft TLOs for a Bachelor of Theology degree, and each of its three main fields of study.

All Australian theology-related HEPs were invited to send existing learning outcomes and graduate attributes to the committee (in a tight time-frame).⁷ The result was submissions covering some 75% of EFTSL in theology, and the committee was able to draft TLOs and have them circulated for discussion at the ANZATS AGM (July 9), and followed through at the ANZATS Council meeting the following day.

The resulting next stage of the draft is being circulated to all theological HEPs, with responses invited by July 31st to enable further refinement, and the inclusion of tables relating undergraduate and postgraduate awards, to be ready later in 2010.

⁶ See note 2 above – cf Foundation Studies at Trinity College, Melbourne (for overseas students), Avondale’s Alternative Entry, and the refugee-centred Transformation programme at Whitley (MCD).

⁷ ALTC willingly assisted the Council of Deans, sending information and draft TLOs from other humanities disciplines; one of their project staff, Adam Gordon, attended the ANZATS AGM on 9 July.