

Submission in response to the Australian Universities Accord Interim Report, September 2023

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Executive Summary

This submission focuses on five interdependent themes in the Interim Report (Report):

1. creating more ‘diversity between institutions’ⁱⁱ in the Australian higher education sector;
2. pursuing ‘systemic excellence’ⁱⁱⁱ in learning and teaching and the student experience;
3. investing in sector capability and ‘esteem for teaching across the sector’^{iv};
4. regulatory and legislative levers to achieve the learner-centred aspirations^v of the Accord; and
5. implications for the proposed Tertiary Education Commission.

I endorse the Accord Review Panel’s (Panel) systemic, principles-based and cross-sectoral approach to charting a long-haul course for higher education reform. Underpinning principles include a learner-centred focus on equity, quality and a commitment to the transformative role of higher education in promoting social mobility and achieving robust economic and labour market outcomes. In this submission I examine three priorities for staged implementation of the proposed reforms. In the context of sector quality and standards, I then consider selected enabling factors to guard against short-term policy decisions that may have unintended negative consequences in the absence of a robust evidence base and informed, inclusive decision-making.

Part 1: Three priorities for staged implementation of the Accord reforms

1. Creating more diversity and delivering on the priority of institutional diversification

- 1.1 Institutional diversity has been an aspiration of higher education policy reforms of successive Australian governments since the Dawkins era (Krause, 2022a). The aspirations are laudable but the practical realities of implementation are key to the success of this Accord goal.
- 1.2 To achieve sustained outcomes, success starts with a system-wide understanding of *why* institutional diversity is so critical and *why* systemic diversity has been so elusive in Australian higher education to this point. I contend that institutional diversity in higher education is more important than ever in meeting diverse learner, community and industry needs. This imperative is evident at the heart of the proposed reforms.
- 1.3 The Panel must now turn its mind to the practical task of *how* to incentivise and achieve diversification. Values-driven policy reform, legislative and regulatory levers, and mission intentionality on the part of government and providers are keys to successful execution. Implementations risks include: i. pursuing diversity for its own sake and losing sight of the learner-centred equity imperatives; and ii. the well-documented trend to convergence and institutional isomorphism as an expedient way to achieve legitimacy while responding to government policy, legislative and funding settings that have contributed substantially to the current shape of the Australian higher education sector.
- 1.4 The prospective Accord reforms provide an opportunity intentionally to plan a new system, taking into account the regulatory, legislative, policy and funding levers so critical to achieving the desired institutional diversity.
- 1.5 The only way the challenge of legitimacy for new types of institutions in a reformed system will be addressed is if an ecosystemic, policy-driven approach is taken, accompanied by practical evidence of validation of new models, through incentivisation, validating nomenclature and the like.
- 1.6 In this Report I see evidence of values-driven proposals in relation to the goals of equity and access, learner-centred higher education and the importance of investing in educational innovation and excellence. It will be important to ensure these values inform policy levers which, in turn, will need to achieve practical outcomes if diversification aspirations are to be realised.
- 1.7 I note the Panel’s view ‘that the requirements of the PCS [Provider Category Standards] may be preventing institutions from developing stronger identities and diversity’, particularly in relation to current research requirements^{vi}. As definitions and current activity requirements are considered in the context of increasing diversity, I urge an evidence-based approach, drawing on current examples from the sector. Avondale University is an instructive case study to consider in this regard. It is currently the only Australian university that is testing the thresholds of the PCS by focusing historically and intentionally on coursework and applied research in just three Broad Fields of Education. With its 126-year history of tertiary education delivery, and a 2-year history as a ‘new university’ it is a useful exemplar to investigate. Notwithstanding its independent,

faith-based status, there are more widely applicable lessons to be drawn as consideration is given to how smaller public universities may emerge with specialised areas of focus and expertise.

- 1.8 Under the banner of institutional diversity, scale is a key consideration. The option of new, amalgamated universities warrants close attention. There is merit, too, in informed consideration of how to truly achieve greater diversity through reduced scale with a goal of innovative learning environments that specialise in personalised student support and pastoral care as an integral part of the university curriculum.
- 1.9 It is pleasing to see recognition of the link between institutional diversity aspirations and the need for a new funding model that is student-centred, needs-based, and cognisant of the needs of institutions committed to providing high-quality higher education for students from equity backgrounds and from different locations^{vii}. An evidence-based understanding of the true costs of supporting learner success through orientation, transition and year-on-year successful progression is essential if the equity and excellence aspirations of these reforms are to be achieved.
- 1.10 Proactively facilitating diversity and differentiation cannot be achieved in isolation. Policy statements alone cannot achieve this goal either. If differentiated higher education institutions are to resist the gravitational pull towards convergence and achieve legitimacy in their own right, government policy drivers need to be accompanied by institutional and sector-level efforts to achieve the paradigm shift required to progress from aspiration to action.

2. Pursuing systemic excellence in learning, teaching and the student experience

- 2.1 I affirm the commitment to innovation, teaching excellence and strategies for enhancing the quality of learning, teaching and the student experience in the Report. It is disappointing to see relatively few submissions exploring how this may be enacted^{viii}.
- 2.2 I also affirm the Panel's recognition that it will be important to give consideration to 'an office or committee for quality teaching to enable collaborative and innovative models of learning and teaching and advise government on structural issues'^{ix}.
- 2.3 In pursuing this focus, an integrated, whole-of-curriculum approach is needed (Krause, 2022b) to achieve excellence in addressing the needs of diverse learner cohorts in our higher education sector. Curriculum encompasses the total student learning experience.
- 2.4 If learners from diverse backgrounds are truly to benefit from this reform process, a holistic sector-level approach to policy in support of systemic excellence is essential. A curriculum-informed policy lens would inform a joined-up approach to support retention, progression and success through the learner lifecycle. Learning design, assessment, pastoral care, advising, wellbeing support and co-curricular enrichment all play a role in this holistic curriculum perspective.
- 2.5 A focus on teaching excellence, in isolation from learning, the needs of diverse learners, and the role of bespoke support strategies in enhancing learner experiences and outcomes will not achieve the aspirations of these reforms. Teaching excellence must be addressed alongside work on excellence in learning and student support. It must also take account of the rapid evolution of the knowledge economy, AI and the disruptive implications for curriculum design and new models of learner engagement.
- 2.6 I commend the Report's focus on incentivising, recognising, celebrating and measuring excellence. This suite of proposals will be enriched by a holistic approach to defining and measuring excellence across the suite of curricular, co- and extra-curricular activities that contribute to successful learner experiences and outcomes across diverse cohorts.
- 2.7 The student voice is key to successful implementation of these reforms. Partnering with learners in co-design and co-implementation initiatives will contribute to sustained systemic and institutional excellence and innovation. Being learner-centred takes us beyond a traditional focus on enhancing the student experience, as important as that is, to engaging with students as self-directed, agentic learners. It represents a more expansive view of learners engaged in lifelong, lifewide learning unbounded by time, institution or place (Krause, 2023).
- 2.8 I support the Panel's call for timely availability of data^x. Further, there is a need for informed analysis and reporting that cross-references multiple existing student datasets to avoid the tendency to adopt a siloed approach to analysis and reporting and to address enhancement priorities across the sector.

3. Investing in sector capability and esteem for teaching

- 3.1 I commend the Panel for recognising the foundational importance of building capability in the sector to strengthen resilience among academic and professional staff who face the day-to-day realities of continuous

- change. The need to ‘pivot’ during COVID was not a one-off event. If the sector is to sustain excellence and engage in reforms of the kind pre-empted by this Report, investing in staff capability is essential.
- 3.2 However, the Report does not go far enough in this regard. While incentivising and valuing all academic roles^{xi} is an essential starting point, a more advanced understanding of the complexity of the higher education workforce is critical. This includes recognising the importance of third space professionals and the contribution of leadership capability in progressing the paradigm shifts required to enact these reforms (Krause 2023).
 - 3.3 As the Panel considers policy matters in relation to how to facilitate and encourage change and evolution, investment in sector leadership is critical. I would encourage the Panel to expand its vision to consider investing in a Higher Education Leadership Academy, or equivalent to ensure a national level approach to sustaining systemic reform. New kinds of tertiary education institutions demand fresh approaches to systemic succession planning, leadership and culture shaping. This demands government-level investment and impetus.
 - 3.4 The proposal to launch competitive funding programs across multiple institutions, including universities and TAFEs is a positive contributor to strengthening cross-sectoral ties. It will be important for the proposed National Learning and Teaching Committee (or equivalent) to play a role in communicating the esteem attached to these cross-sectoral collaborations, outcomes and impact to reinforce their value at the highest levels.
 - 3.5 Purposeful strategies for shaping the culture of the sector and the parity of esteem for teaching and research will be key to successful implementation.
 - 3.6 Encouraging all institutions to provide high-quality accredited professional development in teaching^{xii} is not a new idea. The principle is sound, but implementation will be strengthened by considering ways to support and incentivise institutions to collaborate in this regard^{xiii}.

Part 2: Enabling factors

There are several enablers of success in achieving the ambitions of the Accord. I reflect on a selection below, specifically in relation to higher education quality and standards.

4. Regulatory and legislative levers to achieve the learner-centred aspirations of the Accord

- 4.1 As noted in 1.7, I caution against reviewing the PCS before understanding how providers are testing the boundaries and possibilities of existing standards. Consideration should be given to further ways to learn from and legitimate those providers testing new ways of operating that haven’t been tried before. This evidence may help to inform determination of the utility of the PCS.
- 4.2 In reviewing submissions to this consultation process, I observe relatively limited commentary on the regulatory framework that will be so key to facilitating the anticipated reforms while assuring the quality and integrity of Australian higher education. I encourage a more advanced dialogue about the opportunities already available to the sector within the existing HESF and TEQSA Act before progressing to further review.
- 4.3 The Report makes reference to the need to ‘encourage the sector to move beyond the minimal standards approach and to pursue systemic excellence in learning and teaching’^{xiv}. The Report also notes the importance of ensuring that ‘tertiary education regulation...enables innovation’^{xv}. In addressing these matters, there is a need to situate next steps in the context of a deep understanding of the distinctions between the quality assurance role of regulation and the opportunities for quality enhancement and innovation that are currently enabled by a threshold approach to standards.
- 4.4 In this context, I reflect on my experience as a member of the Higher Education Standards Panel (HESP) over the past 6 years. The HESP takes account of the implications of the HESF for quality and standards across the higher education sector, providing independent advice to the Minister and/or advising and making recommendations to TEQSA on matters relating to the HESF. The recently commissioned HESP [Modes of delivery in higher education](#) report addressed the adequacy of the HESF in the context of the rapid increase in online and mixed mode delivery. At the same time, it highlighted several areas of good practice that were shared with the sector for the purposes of ongoing enhancement. In this way, quality assurance and enhancement work hand-in-hand to assure the integrity of the higher education system and to promote innovation.

5. Implications for the proposed Tertiary Education Commission

- 5.1 I endorse the proposal for a joined up approach to leading and designing an interconnected national tertiary education system.

- 5.2 Several principles underpinning the operation of the HESP are worth considering in thinking about the successful implementation of the proposed TEC and its component parts, particularly in relation to sector quality. These principles include:
- being sufficiently agile and responsive to changes in the sector to identify areas for deeper analysis, especially as they relate to sector quality, standards and learner experiences (e.g., [Improving retention, completion and success in higher education](#) and [Modes of delivery in higher education](#));
 - working closely with the Department as required, including requests for data;
 - advising and making recommendations to the Minister on matters relating to quality and the HESF;
 - advising and making recommendations to TEQSA on matters relating to the HESF and in relation to TEQSA's strategic objectives, corporate plan, streamlining of activities, reform agenda and approaches to deregulation; establishing advisory committees to assist in key functions (e.g., in relation to admissions transparency); and consulting with interested parties when performing its functions^{xvi}.
- 5.3 The [HESP Submission to the Accord Discussion Paper](#), June 2023 on admissions transparency and the changing landscape of higher education admissions in Australia illustrates the value of a robust, cross-sectoral focus on key issues such as higher education admissions and implications of changing practices for quality, standards and learner outcomes. Over time, this work has drawn on feedback from school sector leaders, parents, certification authorities, Tertiary Admission Centres, and peak body representatives from across the post-secondary education sector, including students, unions, TAFEs, universities and independent higher education providers.
- 5.4 There is merit in considering the value of this independent, boundary-spanning function of the HESP as the Accord Panel contemplates possibilities for the TEC terms of reference and membership.

References

- Krause, K. (2022a). [Higher education sector institutional diversity: An Australian case study](#). *Journal of Higher Education Policy and Management*, 44(4), 393-410.
- Krause, K. (2022b). [Vectors of change in higher education curricula](#). *Journal of Curriculum Studies*, 54(1), 38-52.
- Krause, K. (2023, July). [Learner-centredness and leadership in post-pandemic higher education](#).

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- ⁱ All views expressed in this submission are my own, informed by my experience in senior executive roles in public universities, current leadership of Australia's newest independent university and based on experience as Deputy Chair of the Higher Education Standards Panel and Chair of the Admissions Transparency Advisory Committee to the HESP. I also draw on my expertise as a policy researcher and expert in the field of higher education curriculum, quality and standards.
- ⁱⁱ *Interim Report* p.2
- ⁱⁱⁱ *Interim Report* p.75
- ^{iv} *Interim Report* p.77
- ^v *Interim Report* p.71, 81
- ^{vi} *Interim Report* p.119
- ^{vii} *Interim Report* p.139
- ^{viii} A notable exception is the proposal for a [National Centre for Student Success](#) Johnson et al, April 2023, and the further endorsement of [Johnson et al for national collaboration on learning and teaching](#), August 2023.
- ^{ix} *Interim Report* p.87
- ^x *Interim Report* p.89
- ^{xi} *Interim Report* p.88
- ^{xii} *Interim Report* p. 90
- ^{xiii} An example of existing resources include the [CAULLT MOOC](#).
- ^{xiv} *Interim Report* p.86
- ^{xv} *Interim Report* p.127
- ^{xvi} TEQSA Act <https://www.legislation.gov.au/Details/C2022C00328>