

## AUSTRALIAN HISTORICAL ASSOCIATION

### Submission to the TEQSA Discussion Paper, June 2011 'Developing a Framework for Teaching and Learning Standards in Australian Higher Education and the Role of TEQSA'

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21 July 2011

#### PREAMBLE

The Australian Historical Association (AHA) is the peak national body of academic historians in Australia with a membership of several hundred academics in more than 30 universities across all states and territories. Its vital role as advocate and representative for the discipline community of History was recently recognized in its role in the Australian Learning and Teaching Council (ALTC) Learning and Teaching Academic Standards (LTAS) project. The AHA strongly endorses the collegial processes that underpinned the LTAS project and continues its engagement with the standards process through its involvement with the ALTC Priority Project 'After Standards' (led by Associate Professor Sean Brawley at the University of New South Wales) which is continuing the work on standards (eg AQF Level 8 and 9 statements) and the use of 'standards' as a tool for curriculum renewal in the discipline of History.

The AHA is currently engaged in wide-ranging discussion of the role it might play in accrediting History majors in Australian university programs. These discussions include engagement with other stakeholders, such as the History Teachers' Association of Australia and the Australian Council of Professional Historian Associations. The Heads of History from universities across Australia meet regularly at the annual conference of the AHA, which is held at metropolitan and regional campuses throughout the country. The AHA supports a major journal for the dissemination of the latest thinking in teaching and research called *History Australia*.

The AHA wishes to express its concern at the timing and the brief period made available for feedback on this discussion paper but wishes to offer the following comment and recommendations.

#### SECTION 1: THE POLICY CONTEXT FOR NATIONAL TEACHING AND LEARNING STANDARDS

##### DISCUSSION POINTS

1. *Does the proposed definition of teaching and learning standards provide a firm conceptual base for the development of a framework? Does it provide*

*clarity for the purpose of communications between institutions, TEQSA and other involved parties? Is there a better definition that could be used?*

The AHA believes that to be effective nationally, standards should be understood in terms of the minimum levels of attainment required by the discipline or area of study. The system, however, should also be designed to encourage aspirational standards, to ensure that teachers strive for continual improvement (innovation and enhancement) rather than be used as a conservative tool that sees institutions and discipline communities seek simply to meet threshold requirements. Such an approach would stifle new approaches to learning and teaching. In the view of the AHA the proposed definitions do not provide sufficient clarity. Further work needs to be done in this regard.

The AHA notes that most History majors in the country are completed within generalist degrees such as the Bachelor of Arts. This raises issues in a standards framework because of the need to test both the viability of the overall multidisciplinary program as well as the major(s) completed by the student (in the case of the History major in Australia ranging from 30% to 37% of the BA). It is not clear to the AHA that this important distinction and its many consequences are adequately appreciated in the discussion document. This complexity, like learning and teaching standards themselves, suggests a need for a multiplicity of approaches to the verification processes that reflect input from different stakeholders. The AHA suggests that its membership contains the experts necessary for judging the standards for History, but would defer to institutions to make the broader case around the BA in which the History major is located. One assumes that other generalist degrees in Science and Commerce face similar issues.

#### The authority of disciplines

The AHA is deeply concerned by the relegation of discipline communities in this section of the document to “other involved parties”. Beyond a few vague statements on the importance of discipline communities, the document as a whole is surprisingly neglectful of the proper place of the discipline communities in standards formulation and verification process. For example on Page 6 the statement that discipline skills ‘will be considered in reviewing learning standards’ is worryingly vague. The discussion paper is clearly influenced by the Commonwealth’s 2008 *Review of Higher Education* (for example in its invocation of the notion of ‘Fitness for Purpose’ as the means by which quality was assured) yet neglects to recall the suggestion in that report that any standards framework around a discipline must reflect the ‘the judgment of those who are expert in it’. Discipline communities deserve to be recognized as full third parties in this process along with TEQSA and institutions. The AHA in this respect is reminded of the conclusion to the ALTC LTAS report: ‘Failure of the new quality assurance framework to follow through on the commitment made by the professional and academic bodies and peak industry groups will create a credibility gap. At risk is the loss of goodwill from major stakeholders which will be essential to their future involvement’. History should be treated in

this regard in the same way as other 'professional' disciplines.

2. *It is proposed that teaching standards and learning standards are conceptually distinct and therefore require consideration as separate sub-domains for TEQSA quality assurance and regulatory activities. Are there any problems with creating two sub-domains of this kind?*

The AHA sees merit in exploring the distinction between teaching and learning standards and the de-coupling of them within this document is welcomed. While it may transpire that the resulting discussion concludes that the two threads should be viewed holistically rather than separately, that discussion should be welcomed.

This uncoupling might provide one means by which the obvious tension between the desires of institutions and the desires of discipline communities could be addressed. The expression of ideas on 'teaching standards' does extend some distance past disciplinary involvement/responsibility. Might teaching and learning be distinguished as process and outcome standards rather than in terms of a rather artificial distinction between learning and teaching?

3. *Are the seven principles for TEQSA's role within a national teaching and learning standards framework appropriate?*

The seven principles for TEQSA are a good starting point; however, they need some elaboration, refinement and extension.

**Principle 1** should be refined to recognize the autonomy of discipline communities.

**Principles 2 and 3:** The AHA believes further work needs to be done here to clarify what constitutes an 'expert' for the purposes of this enterprise. Whose interests are these experts serving? Here a body such as the now defunct ALTC could have played a useful educative role in assisting disciplines to identify (and perhaps accredit?) 'experts' within a discipline community or institution. The AHA fears that the lack of precision reflects a belief that the experts will be found in the bureaucracy and amongst educational theorists or teaching and learning units in institutions, rather than from within national discipline communities. Two decades of research in the Scholarship of Teaching and Learning (SOTL) would suggest that to deny the authority of the discipline expert would be to make a grave mistake.

**Principle 4:** It would be useful to indicate triggers for review (is review just a matter of the passage of time, or should it result from changes in the disciplines, or in the sector?) Early media reports suggested a time frame of seven years.

This might be appropriate for an institutional audit, but not within a discipline area or program of study. A rolling process of internal review that incorporates a major review at an agreed time would seem an appropriate way forward.

**Principles 5 and 6:** At the end of the day the most important consequence for a national standards process is that it drives quality assurance and quality improvement within institutional curricula.

**Principle 7:** Refer to earlier comments on expertise.

## **SECTION 2: A BRIEF REVIEW OF INTERNATIONAL AND DOMESTIC DEVELOPMENTS**

### **DISCUSSION POINTS**

4. *Does this short review omit key developments or trends that are worth considering?*

Electronic Portfolios that do not create another layer of work for already overworked academics would be strongly endorsed by the AHA as a means of providing documentation for testing compliance. The use of curriculum mapping as part of an audit process also has merit. We strongly endorse an external peer review process similar to that utilized in the United Kingdom.

5. *For the sake of brevity, the review has presented blunt assessments of the utility of various developments. Are any of these assessments inaccurate or misleading?*

For whatever reasons and motivations the discussion paper has done a great disservice to the ALTC LTAS project. Comments that suggest the project did little more than present 'guides to curriculum design' under-value the project and its results. The AHA is left to conclude that this was deliberate and reflects a determination to downplay the role of discipline communities as the 'owners' and 'definers' of the attributes in their area of study.

The AHA endorsed the LTAS project as providing a workable and collegial process. The AHA and the broader discipline community's work in the continuing ALTC 'After Standards' project highlights this point. The AHA rejects the assertions made in the media before the release of this discussion paper (*The Australian*, 6 & 13 April) that the process had been flawed and the standards produced lacked 'rigor'. The discipline community is happy with the AQF Level 7 standards. If the work of the LTAS project is dismissed who will create the new set of standards for History? Securing stakeholder engagement is most important and the AHA wishes to re-assured that TEQSA has confidence in the discipline community's abilities to set its own standards.

The discipline community has itself been working on teaching modes, learning

activities and assessment methods as highlighted by the After Standards national workshop held at the University of New South Wales over three days in April. The LTAS project was the beginning of a lengthy process. The discussion paper implies it was both beginning and an unsatisfactory end.

The disparaging treatment of the LTAS project in this discussion paper highlights the benefits of having an independent organization, at arm's length from the regulator, assisting institutions and discipline communities in setting teaching and learning standards. DEEWR and TEQSA cannot both seek to improve quality and at the same time judge its success. As the peak body representing academic historians across more than 30 institutions in Australia, the AHA submits that it should play a major role in setting teaching and learning standards in the discipline of History.

### **SECTION 3: STEPS TOWARD AUSTRALIAN TEACHING AND LEARNING STANDARDS**

#### **DISCUSSION POINTS**

6. *Is the broad architecture of relationships depicted in Figure 1 an appropriate basis for the development of a standards framework?*

The Figure is vague. Greater clarification is required. Consequently, the AHA is unable to comment authoritatively on this question other than to note that although the paper recognises that a tension exists between the writing and implementation of standards and the particular missions of different universities, this recognition and its implications are not developed. There is no indication how this tension will be addressed and how it will impact other aspects of university governance and compliance expectations. Although this has particular implications for university governance, the tension will be exacerbated within disciplines that sit across the university sector and have to comply both with standards for the discipline and demands of individual universities.

7. *Is the approach suggested for structuring standards statements in Figure 2 a viable way to proceed?*

The AHA finds the illustrated process difficult to interpret. It speaks to a number of the concerns raised previously, notably the distinction between a broad generalist degree and a discipline major. Again the absence of process for consultation with discipline communities is a matter of deep concern.

8. *What role does testing of generic or discipline-based knowledge and skills using common instruments have to play in ensuring, monitoring and demonstrating learning standards in Australia?*

The AHA rejects the suggestion of a national 'test' as the means by which an institution's students are deemed to have met national standards in History. First, such testing is not an authentic form of assessment and would not allow reflection on all the current agreed standards for History. Second, what would happen to students who fail the test? The AHA encourages the use of portfolios as the best means by which students' achievement could be verified.

9. *Are there other possible measures or indicators that should be considered?  
And*
10. *How should TEQSA utilise expert review, both for review of teaching standards and for review of learning standards, in ways that are time and cost-effective?*

See earlier comments on portfolios, curriculum mapping and external peer review. Again the British experience demonstrates that site visits by peer reviewers can work very effectively as tools for quality improvement and also that they are a relatively inexpensive method of review and assessment.

### **General Observations**

The AHA is of the view that the proposed Standards Panel should not be dominated by senior university executives with little or no engagement with the scholarship of teaching and learning in specific disciplines. If this happens TEQSA will replicate the major difficulties that the British system confronted in the wake of the Dearing Report of 1997. The AHA believes that the Standards Panel should comprise persons recognized as authorities in particular disciplines.

This Discussion Paper is focused on accountability and comparability, rather than on the aim of enhancement and extension of good practice. The AHA would like to think that this process envisaged would adopt a more creative approach to its work than implied in the observation that it will "accommodate innovation" (p5).

The Paper relies on outdated ideas about 'generic skills'. Critical thinking, for example, is not a 'generic skill'. Rather it is translated in different ways in different disciplinary contexts to particular questions. One does not critically think about nothing.

With regard to 'levels' (p17) the study of History is an iterative process that does not always lend itself to such mechanical divisions. Nonetheless, 'progress' is an important idea, which the discipline community is discussing through the After Standards process.

There is no mention in the Paper of the developments taking place in distance education. It seems that the tenor of the paper is very much geared to traditional face-to-face teaching and the learning of traditional students. How will standards be applied to new forms of e-learning? How will the advances in this pedagogical practice be incorporated into the standards framework?

If there is to be further consultation in the establishment of standards for teaching and learning in the discipline of History in Australia , the AHA as the peak body for historians in Australia seeks active participation in this process.