Australian University Quality Agency (AUQA) Audits of Non Self-accrediting Higher Education Institutions: A Reflection on the Issues Arising

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The Australian Higher Education Support Act 2003 requires approved higher education providers to undergo a quality audit every five years. These audits are conducted by the Australian University Quality Agency (AUQA). AUQA's mission is to provide public assurance of the quality of Australia's universities and other institutions of higher education. In this paper we reflect on the outcomes of the first eight published AUQA reports of non self-accrediting institutions. Based on the affirmations and recommendations contained in those reports we analyse the main issues arising and their importance in the provision of quality higher education by private non self-accrediting higher education institutions.

In line with the move from an elite to a mass system of higher education (TDA, 2008, p. 5), and in order to meet the increasing demand for higher education places driven by the larger population of university-going age (Davis, 2004, p. 3), the Australian higher education sector has experienced substantial growth during the past two decades. In response to this increasing demand, a new sector in higher education provision is emerging. This involves accredited providers of higher education courses that are not universities (Jones & Ryan 2008).

As at June 2009, there were 141 non self-accrediting institutions approved to deliver higher education courses in one or more Australian states and/or territories (Australian Qualifications Framework, 2009). These institutions may also apply to become higher education providers (HEPs) under the provisions of the *Higher Education Support Act 2003* in order to offer FEE-HELP to their eligible students. Seventy-two of the 141 non self-accrediting higher education institutions are also approved HEPs (Department of Education, Employment and Workplace Relations, 2009).

HEPs are required to undergo periodic quality audits by a body listed in Chapter 5 of the *Higher Education Provider Guidelines* (Department of Education, Science and Training, 2007). Currently the Australian Universities Quality Agency (AUQA) is the only auditing body listed; however, there are provisions in place to add additional auditing bodies.

At the time of preparation of this paper eight quality audits of non self-accrediting higher education institutions (NSAIs) had been conducted and published by AUQA. These are shown in Table 1.

Table 1: Published AUQA audit reports on NSAIs – January 2007 – April 2009

#	Date	Institution
1	January 2007	Australian College of Theology
2	February 2008	Australian College of Applied Psychology
3	May 2008	College of Law
4	September 2008	Moore Theological College
5	January 2009	Avondale College
6	February 2009	Raffles College of Design and Commerce
7	April 2009	Gordon Institute of TAFE
8	April 2009	Tabor College (NSW)

A full text copy of these reports is available from: http://www.auqa.edu.au/qualityaudit/nsai/

AUQA audit reports are as attentive to identifying commendable practices in an institution as they are to identifying areas for improvement. Even though an AUQA report therefore typically includes what are referred to by AUQA as 'commendations' and other favourable comments on an institution, in this paper we will reflect specifically on what AUQA refer to as 'affirmations' and 'recommendations' that identify areas for quality improvement in the first eight published AUQA audits of NSAIs. Affirmations highlight areas AUQA believes require improvement that have already been identified as needing attention by the institution in its Performance Portfolio. Recommendations, on the other hand, alert an institution to areas requiring specific attention that AUQA believes have not been previously identified.

The analysis of the issues arising from these affirmations and recommendations is presented in the context of the following five key pillars of quality higher education that have been identified by Ryan (2009), namely governance, faculty (i.e. academic staff), scholarship, facilities and resources, and a quality management system.

Governance

Good governance in a typical higher education institution reflects two broad categories: institutional governance overseen by a governing body, and academic governance overseen by an academic board. Established good governance principles refer to the way in which an organisation manages itself to ensure that it meets its strategic and operational objectives, maintains financial viability, complies with legal requirements, and discharges its social responsibility (ASX Corporate Governance Council, 2003). To manage institutional governance the National Guidelines for Higher Education Approval Processes require an NSAI to have 'a legally constituted governing body which has responsibility for oversight of all of the institution's activities including conferral of its higher education awards and the delegation of academic governance to an appropriate body' (MCEETYA, 2007, p. 15).

Academic governance refers to how an NSAI will ensure that its academic objectives are met independently of the ownership and management of the institution or, as Jackson has noted, a structure 'that shield[s] academic decisions from the pure profit motive' (2008, p. 1). The National Guidelines for Higher Education Approval Processes require that an NSAI 'has academic governance arrangements, such as a properly constituted academic board and/or course advisory committees, which provide the institution with access to expertise to ensure that standards are comparable with Australian universities' (MCEETYA 2007, p. 17).

A detailed understanding of institutional and academic governance in the context of registering and operating an NSAI is a key component of its quality management system. However, comprehensive information about satisfactory governance arrangements for NSAIs is not provided in the literature. Therefore, what constitutes 'good' institutional and academic governance is often not well understood and is consequently poorly applied in many institutions.

An NSAI's governing body should be constituted in such a way that it is able to give independent advice to the institution. For example, the Australian College of Applied Psychology was advised to consider broadening the membership of its governing body to include persons independent of the institution who would be able to provide impartial, informed advice. Tabor College NSW was recommended to ensure a diverse membership of its governing body, including higher education expertise.

In the case of Raffles College of Design and Commerce and Tabor College NSW, AUQA was of the view that a combination of the roles of chair of the governing body and the CEO was inappropriate, given the governing body's role in appointing and monitoring the performance of the CEO. For Raffles College of Design and Commerce, AUQA also recommended that members of the institution's governing body receive appropriate professional development to discharge their governance responsibilities effectively.

AUQA recommended that NSAIs, such as the College of Law, should constitute their academic boards with a view to having strong and senior membership commensurate with their important academic oversight responsibilities. As academic boards are considered the focus of academic discussion and are responsible for the assurance of academic quality and academic standards within an institution, AUQA questioned the advisability of having an internal chair, as in the case of Raffles College of Design and Commerce, and furthermore endorsed the advantages of external representation on academic governance committees generally.

AUQA has made it clear that each body in an NSAI's governance structure should have a clearly defined role in its quality management system. Avondale College were advised to clearly define the relationships between the role of the governing body, the CEO, and senior staff in terms of governance and management. AUQA also recommended that the College review the terms of reference of its academic board to ensure that it had clear responsibility for leadership in, and effective management of, academic policy. AUQA recommended that Raffles College of Design and Commerce further define the academic governance responsibilities of its academic committees and drew specific attention to the interface of academic governance with the role of the corporate management of the institution.

To ensure an effective governance structure, AUQA has also recommended:

- that Raffles College of Design and Commerce ensure active participation of student representatives on the governing body, academic board, and other relevant committees;
- that Moore Theological College and the Gordon Institute of TAFE implement regular reviews of their governance structure including membership of each of the governance bodies to ensure fitness for purpose;
- that Tabor College NSW develop strong communication and consultation between the governing body, the academic board, and other relevant committees; and
- that Moore Theological College engage its governance bodies in the strategic planning process.

Faculty

In order to supervise and deliver its courses, and to ensure educational quality, an NSAI must have an appropriate profile of suitably qualified and experienced academic staff appropriate for the mission, nature, size, and complexity of the institution (MCEETYA 2007, p. 18).

The Australian College of Applied Psychology and Avondale College received AUQA recommendations to appoint key senior staff to their faculties to provide academic leadership, promote scholarship, and assure internal academic quality assurance. AUQA also recommended that the Australian College of Theology adhere to a risk-managed succession plan for key academic leaders to ensure that academic quality is sustained in the longer term.

It was noted in the reports of the Australian College of Applied Psychology and Raffles College of Design and Commerce that a balance between continuing and sessional academic appointments was an important factor in the overall mix of an institution's faculty. This was extended to a balanced gender representation in the report for Moore Theological College.

AUQA recommended that the College of Law and Gordon Institute of TAFE each develop an appropriate academic workload matrix that clearly specified what was expected of academic members of staff. Specifically, for Moore Theological College, this recommendation encompassed teaching load, scholarship, administration, and student support to ensure that overall workloads for teaching staff remained manageable. Furthermore, faculty should be provided with ample opportunity to actively participate in the academic life of the institution as in the case of the Australian College of Applied Psychology, and particularly, in reference to the College of Law, the systematic innovation and improvement in course design and teaching.

AUQA also recommended that academic staff be:

- afforded professional development opportunities, especially as they relate to teaching and learning as specified in the reports on the Australian College of Applied Psychology, Moore Theological College, and Tabor College NSW;
- systematically appraised at the Raffles College of Design and Commerce, and that Moore Theological College do so against key performance indicators; and
- appropriately remunerated in the case of the Australian College of Applied Psychology, and appropriately promoted in the case of Moore Theological College.

Scholarship

To support teaching and learning within an NSAI it is important that a culture of scholarship is nurtured throughout the institution and its faculty (MCEETYA, 2007, p. 18). It is expected that a normal part of the duties of academic staff is to undertake scholarly activity that extends the boundaries of knowledge and understanding in their disciplines or extends their own scholarship and understandings. However, at the same time it should be recognised that, while scholarship is a normal part of the work of an academic, most non self-accrediting higher education providers are primarily engaged in teaching. Consequently, scholarship within NSAIs is often predominantly focussed on improving the quality of the institution's courses via its teaching and learning environment (Batchelor Institute, 2007, p. 1).

AUQA recommended that the College of Law should embed the notion of a culture of scholarship in its mission and goals. Embedding a culture of scholarship in an institution's mission should be realised through clear academic plans that formalise approaches to scholarly activity as indicated in the reports to the Australian College of Theology, College of Law, Avondale College, and Tabor College NSW, and that this should be done in consultation with staff as in the case of Avondale College.

Facilities and resources

To operate effectively in the higher education sector it is necessary that appropriate resources are available to enable course objectives to be achieved successfully (MCEETYA, 2007a, p. 19). Appropriate resources include physical infrastructure that would usually consist of rooms in which to conduct lectures and tutorials; a library; computer laboratories; offices for faculty, administrative, and support staff; student common areas; other specialist facilities if required by a particular discipline; and a range of support services that ensure that an institution meets its duty of care to students. The issue of duty of care was specifically raised in the report to the Australian College of Applied Psychology.

AUQA recommended that Moore Theological College and Avondale College invest further in appropriate technology, with dedicated technical support, as an integral part of the resources that should be available to students and as an important tool for teaching and learning. In the reports to Avondale College, Tabor College NSW, and the Australian College of Applied Psychology AUQA noted the difficulties and challenges when allocating appropriate resources and support services to off-campus students. AUQA made a specific recommendation that Raffles College of Design and Commerce implement a systematic approach to the maintenance of all teaching equipment and facilities.

Quality management system

A quality management system (QMS) defines the way in which an NSAI assures the quality of its operations and its academic outcomes. Quality assurance refers to the planning, policies, attitudes, actions, and procedures necessary to ensure that quality is being maintained and enhanced (Woodhouse, 2009, p. 3). It requires actions internal to the institution, but may also include the involvement of external bodies. It involves strategic planning, course design, policies and procedures, and systems of review including the collection and use of feedback from students, alumni, and employers (AUQA 2008).

According to some commentators such as Anderson (2006), the application of quality concepts to education - particularly those used in the commercial sector - is anathema, and many critics of quality in education appear to confuse 'quality' with quality assurance processes. An effective QMS for an NSAI ensures that a specified level of quality, defined by the institution's policies and procedures, and governance structure, is actually achieved (Deakin University 2008). Importantly, however, AUQA has recognised that policies and procedures should be appropriate to the scale and mission of the institution, disseminated throughout the organisation, fully implemented, and systematically revised and monitored. These observations were made in the reports for Raffles College of Design and Commerce, Tabor College NSW, and Gordon Institute of TAFE.

AUQA noted that for some institutions, such as the Australian College of Theology, there existed a need to develop robust and centralised approaches to quality assurance, that it should be integrated into the institution's strategic planning and risk management methodology, as in the cases of Avondale College and Raffles College of Design and Commerce, and that it should encompass the 'whole of institution' as stated in the report on Moore Theological College. Furthermore, the QMS should be supported by a 'culture of evidence' throughout the institution to ensure the integration of quality improvements through strategic planning processes as recommended in the case of the Australian College of Applied Psychology. This is consistent with the requirement recommended for Tabor College NSW that a quality management system should encourage the transition from a compliance oriented system to a continuous quality improvement approach that is clearly aligned to an institution's strategic and operational objectives.

The evidence base of a robust QMS is composed of a number of facets, including the collection and analysis of stakeholder feedback, benchmarking activities, the collation and analysis of statistical data (metrics), and the moderation of assessment.

AUQA recommended that a number of institutions such as the College of Law have a greater focus on the collection of feedback from a wide variety of stakeholders, including students, alumni, staff, and employers, and the provision of regular and transparent feedback on outcomes to their stakeholders such as in the reports on Avondale College, Raffles College of Design and Commerce, and the Australian College of Applied Psychology. The meaningful analysis of feedback data was recommended to the Australian College of Applied Psychology to identify themes and systemic improvements to enhance quality and the development of action plans in reports to relevant governance bodies.

The importance of benchmarking an NSAI's performance was also noted by AUQA, as in the case of the Australian College of Applied Psychology, including processes to compare and benchmark academic and operational processes and outcomes with peer institutions to implement good practice and assure that an institution's courses and operations were of a high standard. A number of NSAIs, Moore Theological College, Avondale College, Tabor College NSW, were encouraged to increase their benchmarking activity. The College of Law was advised to undertake more international benchmarking, especially in relation to academic standards. In the case of Raffles College of Design and Commerce, AUQA recommended that it begin to develop and implement an approach to benchmarking.

The collection, analysis, and reporting of statistical data was recognised as a key component of a robust QMS. AUQA recommended that the Australian College of Applied Psychology and Gordon Institute of TAFE use their data to analyse student academic outcomes in relation to progression, retention, attrition, and academic performance. Furthermore, AUQA recommended that the Australian College of Theology, Tabor College NSW, and the Australian College of Applied Psychology develop a set of standard reports on student information and academic outcomes to assist managers and committees to systematically assess how the institution was performing on key measures of educational performance and to identify areas for improvement.

In the case of Raffles College of Design and Commerce, AUQA noted the importance of the moderation of assessment practices to assure consistency in the measurement of academic achievement. This was particularly relevant for institutions such as the College of Law that deliver across multiple campuses and modes of delivery. Furthermore, it was suggested that NSAIs, such as the Australian College of Applied Psychology, engage in external moderation to broaden the scope and reliability of measuring academic achievement.

Other issues arising

Several additional issues were noted by AUQA in a number of its reports. While these issues do not directly align to the five key pillars of quality higher education that form the evaluate framework of this paper, they are nevertheless relevant to the broader analysis of achieving quality outcomes in higher education. AUQA:

- strongly recommended that dual sector institutions that offer vocational training as well as higher education courses, such as the Australian College of Applied Psychology, and do so using the same faculty, resources, and facilities (and sometimes curriculum) should clearly separate delivery arrangements between the various student cohorts.
- recognised the value of flexible delivery methods and affirmed the willingness of the Australian College of Theology to support the provision of distance education.
- noted the importance of developing and maintaining strong links with stakeholders and alumni in an institution's community of practice as in the case of Tabor College NSW.
- recognised the challenges associated with international delivery through offshore campuses and licensees. It recommended that the relevant governance bodies of an institution, such as Raffles College of Design and Commerce and the Australian College of Applied Psychology, implement

a comprehensive leadership and oversight role in the review of transnational teaching sites to assure the equivalence of offshore and onshore delivery.

Conclusion

The Australian higher education sector has experienced substantial growth during the past two decades and NSAIs have contributed significantly to that growth. However, the first eight published AUQA reports indicate that in spite of their well-deserved commendations, NSAIs have a range of issues that must be addressed to ensure quality educational outcomes.

In this paper we have analysed these issues in the framework of the five key pillars of quality higher education. In terms of governance, we observed that each institution was challenged, in one way or another, to review and/or strengthen its institutional and/or academic structures of governance, often with an eye to gaining self-accrediting status in the future.

Most institutions were challenged to raise the profile of suitably qualified and experienced academic staff in alignment with their mission, nature, size, and complexity. Furthermore, there was an identified requirement to support their teaching and learning activities through the development and nurturing of a culture of scholarship that would extend the boundaries of knowledge and understanding in their respective disciplines.

AUQA recommended that a number of institutions take particular care when providing flexible modes of delivery to ensure that these forms of delivery would be supported by appropriate technology and dedicated technical support to assure the equivalency of the student learning experience to other modes of delivery.

Finally, the pillar of quality higher education most commented on by AUQA was regarding the robustness of each institution's QMS to assure the quality of its operations and academic outcomes. All of the institutions that were reviewed received recommendations about enhancing and/or improving their quality management systems. Institutions that critically reflect on the key issues arising from AUQA audits and take measures to implement improvements to their quality management systems will be well placed to achieve quality outcomes in line with national standards and industry expectations that inform the Australian higher education regulatory framework.

In conclusion, while each published AUQA audit report confirms the contribution of NSAIs to the broader higher education sector, each institution, in its own way, must address the challenges that AUQA has placed before it – whether those challenges involve more appropriate governance, greater investment in faculty and scholarship, improvement of facilities and resources, or a more robust and rigorous quality management system. From the reports analysed in this paper it is evident that AUQA has clearly indicated what each institution must do to strive for improved higher education outcomes. Only the future will reveal if the remaining NSAIs, yet to be audited, will rise to the challenge.

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