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IHEA responds to TEQSA Review - *Making and Assessing Claims of Scholarship and Scholarly Activity*

Peak body cautions that a narrow definition of scholarship will impact diversity and quality in Australian higher education

- Scholarship is essential to the quality of higher education and underpins Australia's world class higher education system.
- Australia's independent higher education sector provides a diversity of opportunity for domestic and international students and IHEA welcomes the opportunity to comment on the TEQSA discussion paper.
- IHEA recognises TEQSA's intention to clarify its measurement of providers' scholarly activities used for assessing claims.
- IHEA cautions that clarification will not deliver sector benefits if it over-simplifies or narrows regulatory application of the definition of scholarship and ways scholarly activities will be assessed.
- A definition and assessment of scholarship that supports a diversity of academic and professional approaches and learning environments will ensure greater opportunities for Australian educated students to succeed.
- IHEA proposes:
 - removal of reliance on a single model of scholarship within the framework and improved guidance for the sector on acceptability of other reputable typologies
 - removal of the mandate for providers to clearly link individual scholarly activity to outputs and outcomes (while supporting the proposed approach for aggregate assessment at the institutional level)
 - different types of scholarly activities be considered separately with specific guidance for each category
 - assessors of claims of scholarship and scholarly activities have sufficient subject/ discipline knowledge and understanding of the provider's mission and purpose
 - more recognition be given to professional development and professional accreditation activities, which are connected to scholarship and should be recognised as such.

Independent Higher Education Australia (IHEA) has today submitted its response to the *TEQSA Review – Making and Assessing Claims of Scholarship and Scholarly Activity (Oct 2020)*. The paper outlines the draft proposed principles TEQSA will use to guide providers in making claims of scholarship, as an institution or individuals within an institution.

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"IHEA recognises TEQSA's intention to clarify its measurement of providers' scholarly activities used for assessing claims, however, we have some reservations about the over-simplification and narrowing of the definition of scholarship and the ways scholarly activities will be assessed," said Dr Sally Burt, IHEA Policy and Research Manager.

"IHEA Members agree with the concept and principle that proposed scholarly activity should be consistent with an established typology of scholarship, however, our submission raises a range of concerns about how this principle is expressed in the discussion paper."

"In particular, a requirement to demonstrate a link between an individual scholarly activity to a specific output or outcome would be very difficult, as results may come from a combination of scholarly activity over a long timeframe. Predetermining outcomes would be contrary to the nature of scholarship and risk limiting the value of research outcomes while increasing administrative burden to institutions."

"IHEA members are supportive of the approach proposed in the TEQSA paper that scholarship be assessed at the institutional level."

"IHEA welcomes TEQSA's commitment to ongoing and broader consultation on the assessment of scholarship. In further consultations IHEA will propose a flexible approach that recognises diversity across the sector and supports innovation in the application and assessment of scholarship."

IHEA's submission also proposes: category-specific guidance for each activity; ensuring assessors have sufficient subject/discipline knowledge and an understanding of the provider's mission and purpose; and, for professional activities to be clearly recognised as scholarship.

IHEA's full submission to TEQSA can be downloaded here.

TEQSA's consultation period on the scholarship review closed today and IHEA is looking forward to reviewing the draft guidance note in the new year.

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About IHEA

Independent Higher Education Australia (IHEA) is a peak body representing Australia's high quality independent higher education providers. Independent higher education employs more than 25,000 Australians and educates 145,000 domestic and international students. Find out more at <u>ihea.edu.au</u>.