

14 December 2020

Mr Alistair MacLean
Chief Executive Officer
TEQSA
GPO Box 1672
Melbourne, VIC 3001

Dear Mr Maclean,

Thank you for the opportunity to comment on TEQSA's Discussion Paper on the "Review of Making and Assessing Claims of Scholarship and Scholarly Activity".

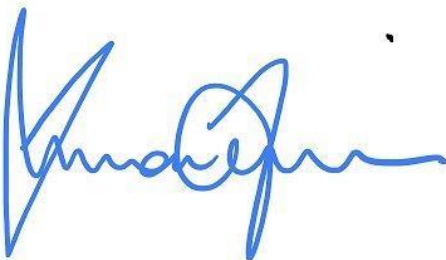
IHEA acknowledges TEQSA's work and engagement with the sector on the development of guidance material to the benefit of all stakeholders. Independent providers welcome clarity on the processes for the assessment of their compliance with the Higher Education Standards Framework and TEQSA's Guidance Notes play an important role in giving that clarity. IHEA values the opportunity to assist in the development of guidance material to reflect the diversity that is a strength of Australia's Higher Education system.

Independent providers understand the importance of scholarship and value scholarly activity. IHEA members strive to create an environment where scholarship flourishes and provides the foundation of the quality education they offer. It is important to recognise the diversity of scholarship that occurs within institutions and that innovative scholarly activities are celebrated along with more traditional research-based scholarship.

Australia's Higher Education system is strengthened by the diversity of providers in mission, discipline focus and structure. Ensuring that compliance with the Standards does not constrain or restrict innovation or diversity, but rather allows it to thrive, is an essential outcome of sector regulation. IHEA is pleased to work collaboratively with TEQSA to assist in the achievement of this objective.

We look forward to continued engagement and consultation to ensure the quality of Australia's independent Higher Education providers is recognised and supported.

Yours sincerely



Simon Finn
Chief Executive Officer

Submission to: TEQSA

Response to: *Review of making and assessing claims of scholarship and scholarly activity*

Executive Summary:

IHEA recognises TEQSA's intention to clarify its measurement of providers' scholarly activities used for assessing claims. It is IHEA's view that this clarification, however, has led to over-simplification and the narrowing of the definition of scholarship and the ways in which scholarly activities will be assessed that does not deliver sector benefits. In particular, IHEA members are concerned that Principle 2 in the Discussion Paper, that requires the ability to record and articulate a clear link between a scholarly activity and the outputs and outcomes that derive from it over-extends the scholarship requirements of the Standards, resulting in a model of measurement that would constrain scholarship in many fields.

This concern with Principle 2 underpins more detailed and specific issues with other parts of the Discussion Paper.

IHEA's response to the discussion questions:

Is the above approach to classification of activities as scholarship appropriate? If not, why not and what amendments would you propose?

IHEA members agree with the concept and principle that proposed scholarly activity should be consistent with an established typology of scholarship. IHEA members, however, raise a range of concerns about the explanation of this principle in the Discussion Paper.

While acknowledging the intent of providing institutions with a guide as to the kind of established framework that would be acceptable to TEQSA, naming Boyer's Model as the example and then focusing the definitions of scholarship on Boyer's typology seems to limit the established frameworks that providers might use to evidence their scholarship. Other reputable frameworks exist, even if Boyer may be the most prominently used. Many IHEA members do utilise Boyer's typology for their own institutional development of scholarship frameworks, but others identify different frameworks that better suit the context of their institution's mission and/or discipline focus. These providers should not be constrained by needing to work their evidence to fit Boyer's model if this has not been determined as the appropriate model for their institution.

Principle 1 uses the wording "consistent with an established typology". Narrowing this down to Boyer's typology in the explanation is more constraining than the guiding principle seems to intend this example to be. Consistent with is not the same as directly aligned to and so the idea of consistency with a reputable framework should be given greater focus in the guidance for providers.

The wording used later in the dot points listed in this section, that scholarly activity needs to be "evidently consistent with some other credible typology of scholarship that embraces similar

principles and is acceptable to TEQSA” is less clear than is perhaps intended. It will be difficult for providers to ascertain which “credible typologies” are not acceptable to TEQSA and who determines the credibility of the approach. The identification of Boyer as a credible framework, along with an explicit reference to other typologies *not* being acceptable to TEQSA may result in institutions interpreting this as meaning they are bound to use Boyer’s typology even if this is not suitable to the institution.

IHEA, therefore, proposes the removal of such a strong reliance on a single model (Boyer) and improved guidance for the sector on the acceptability of other reputable typologies. Providing examples from different models that would be acceptable to TEQSA would assist with this clarity, as would a clearer explanation that the examples are intended as guides rather than prescribing a definitive or preferred model.

Is the proposed approach of linking scholarly activity to intended outputs and/or outcomes relevant to the HES Framework reasonable? If not, why not and what amendments would you propose?

IHEA members express concern with this proposed approach. It seems that TEQSA is seeking to move beyond the nature of the Standards Framework relating to scholarship toward requiring a clear identification of an output or outcome to a particular scholarly activity.

It can be very difficult to provide evidence of the direct correlation of scholarship and output relating to it. It is quite possible that an output or outcome results from a combination of scholarly activity over a long-time frame. This would be very difficult to demonstrate in the method outlined in the Discussion Paper.

IHEA raises caution with the statement on page five of the Discussion Paper “TEQSA will nonetheless expect to see that scholarly activities are accompanied by identification of the intended outcomes of that scholarship, and that some mechanisms are in place to monitor and evaluate such outcomes.”¹ This statement may be interpreted as requiring a predetermined outcome from a scholarly activity which in our view would be contrary to the nature of scholarship. Pure research often leads to unintended consequences or unforeseen outcomes. It is important not to undervalue the indirect benefits of scholarly activity that were not originally included in the reasoning behind the undertaking of that activity.

Research and other scholarly activities do not always impact directly on teaching or curriculum development and, therefore, it could be very difficult to demonstrate the kinds of outputs and outcomes the Discussion Paper outlines. According to TEQSA’s proposed approach, these activities could not be assessed as evidence of scholarship. This seems deeply problematic and contrary to the intent of the Standards.

Boyer discusses many different types of scholarly activities in the examples he uses but does not focus strictly on outputs as a determinant of good scholarship. The evaluation of scholarship, according to Boyer, is a very complex process and can occur in many ways.² For TEQSA to use a very narrow criteria of measurement seems to run counter to Boyer’s thesis and model of scholarship which it is using to underpin its approach.

The Higher Education Standards Framework, as the Discussion Paper notes, refers to scholarship in various places. Although there is a clear connection in the Standards between scholarship and teaching and learning activities, this seems to be in the context of retaining currency in one’s

¹ TEQSA Discussion Paper: Making and Assessing Claims of Scholarship and Scholarly Activity, October 2020, p. 5.

² Boyer, Ernest, *Scholarship Reconsidered: Priorities of the Professoriate*, Princeton, N.J., Carnegie Foundation for the Advancement of Teaching, 1990, pp. 32-38.

discipline rather than explicitly trying to link different scholarship activities to different outcomes in course development or teaching.

It is also problematic that the scholarly activity must relate to the academic's discipline. Interdisciplinary research should be encouraged and can provide great benefit to the institution, other disciplines, and the academic's own development. There is also an issue created by trying to identify the discipline area the academic must be undertaking scholarly activity in. It may be the discipline they are teaching in, or one that they have long been engaged in through other research or scholarly activity. Where a staff member is engaged to teach in a discipline different to their usual area of scholarship (which the Discussion Paper acknowledges frequently occurs [pp. 3-4]), it is implied that this will not be assessed as a scholarly activity. It is unclear, however, why this kind of scholarship would not be assessed as part of the organisational culture and environment of scholarship at an institutional and aggregate level at least.

A requirement on providers to collect and collate information on the scholarship undertaken by its teaching staff and the direct correlation between those activities and the outcomes derived from them, will impose a significant burden of measurement, recording and record-keeping.

Different disciplines and institutional contexts' definitions of scholarship do not necessarily fit into clearly articulatable outputs and outcomes. In the creative or performance arts, for example, it may be very difficult to articulate the exact outcome or output of a certain scholarly activity that is undertaken. Peer review of the scholarship may come long after the activity has been completed. Boyer's thesis is that this kind of scholarship, that is also recognised by existing frameworks such as the ERA, requires a more flexible definition and interpretation of scholarship than is outlined in the Discussion Paper.

IHEA believes that the proposed approach of linking scholarly activity to intended outputs and/or outcomes relevant to the HES Framework is not reasonable and that the Principle be amended to remove this restriction.

Overall, IHEA members see a requirement to clearly link scholarly activity to outputs and outcomes as extremely problematic and as a step beyond that required by the Standards. It is recommended that this section be amended to remove the word "must" from the principle and that it be replaced by the word "could". This would better reflect the nature and intent of being regulated according to the Standards and would provide institutions with a guide as to what *could* be offered as evidence of scholarship rather than mandating it.

IHEA appreciates TEQSA's intent to provide a clear measure for assessment but in doing so it has narrowed the definition of scholarship too far and overstepped the intent of the Standards.

Is it appropriate to distinguish various forms of external engagement from 'scholarship' as identified under Principles 1 and 2? If not, why not and what amendments would you propose?

IHEA members are again concerned that the limitations imposed by Principle 3 are too constraining on a definition of scholarship.

Although routine practice of one's skills in accounting or performing (to use the examples provided in the Discussion Paper) may not constitute scholarship, it should depend on the context in which the activity is engaged within. If in a routine performance, an artist identifies a new technique or through a normal community engagement activity an academic discovers an area of development for a discipline, this should be considered part of a scholarly activity. Again, to assess these activities only by the measure of outputs and outcomes is too constraining and overextends the requirements of the Standards.

If a provider can show that these routine activities are undertaken in a context of institutional scholarship and with a view to development of an academic's involvement and understanding of their discipline, that should be considered in this context as evidence of scholarly activity.

IHEA proposes that the different types of activities listed in this principle be considered separately and that category-specific guidance be provided for each category. For example, Professional Development and Artistic Practice could be considered scholarship but as very different activities, and so separate guidance about the context of each that might be appropriately used as evidence of scholarship should be provided.

Is it workable for providers to be able to demonstrate their planning, monitoring and involvement in scholarship in the aggregate as proposed? If not, why not and what amendments would you propose?

IHEA members understand the need to demonstrate that individual staff are engaged in scholarship, and that institutional plans create a culture and environment of support for scholarly activities. In many ways, it is more practical to demonstrate the aggregate and institutional level scholarship and culture that supports scholarly activity than it is to align individual scholarship directly to outcomes for assessment. This also seems more consistent with the intent of the Standards.

Course improvement and development may occur at an institutional level within the settings of regular annual course reviews or discipline group review meetings and processes. The elements that feed into that collaborative approach to course design and improvement and how they resulted from specific scholarly activities may not be easily identified. Providing evidence of that improvement at the more aggregate and institutional level would create a less onerous burden on providers and individual staff to report and record that connection at the individual level.

IHEA members support Principle 4 and agree that it aligns to the intent and requirements of the Standards and reflects an appropriate form of assessment of scholarship within institutions.

Are there any potential issues you foresee with the application of Principle 5 by TEQSA?

IHEA members are supportive of Principle 5 as a concept and welcome the acceptance of different approaches to scholarship that reflect the nature of the provider. There is some concern, though, about how this Principle will be applied in the assessment of providers' evidence of scholarship.

As commented above, IHEA members have several concerns about Principle 2 and so, as it is relied on here in Principle 5, the concerns about both principles are connected. The Discussion Paper's section on Principle 2 does not seem to reflect the concept outlined in Principle 5 very well. If Principle 2 is amended as suggested above, then IHEA members would be more confident that Principle 5 will be used in the assessment of scholarship.

Providers are concerned to ensure that assessors of the claims of scholarship and scholarly activities have sufficient subject/discipline specific knowledge to be able to understand and assess the nature of scholarship within the context of that discipline. Assessments of scholarship should be made with a clear understanding of the institution's mission and purpose as well as the nature of the provider. This will be necessary in order to implement Principle 5.

IHEA members are cognisant that TEQSA should not provide exhaustive lists of examples that providers need to adhere to in order to meet a Standard. The guidance provided by TEQSA is only guidance and should be written with a tone that reflects this. The risk of referring so closely to a list developed by a select group of providers, who it is acknowledged, do not represent the entire

sector, is that it may be interpreted as an exhaustive list of options rather than providing a range of examples that may guide providers and TEQSA assessors.

Are there specific types of scholarship inputs and outputs within each provider type that should be considered as integral requirements to ensure that the reputation of the sector is upheld?

The reputation of the higher education sector is enhanced through community engagement and deeper connections with industry and other parts of society. This kind of reputational enhancement should not be lost or discouraged through a narrow definition of scholarship and scholarly activities.

More recognition should be given to professional development and professional accreditation activities, particularly for institutions with a purpose to deliver qualifications for professional accreditation and/or professional development. In these circumstances, professional activities are entirely connected to scholarship and should be recognised as such.

Comments on the summary of TEQSA’s proposed approach

IHEA members are concerned with the proposed assessment of claims of individual scholarship. It is in this section of the assessment of scholarship that IHEA believes TEQSA has gone beyond the HESF and overextended in its role to provide guidance on the assessment of compliance with the Standards. Instead, a narrow and prescriptive assessment model that is too restrictive and onerous for providers has been outlined.

In terms of the approach proposed for assessment at the institutional level, IHEA members are much more comfortable with the proposed assessment framework and measures outlined in the Discussion Paper, and particularly those described in the section of that paper labelled “Summary of TEQSA’s Proposed Approach”.

IHEA thanks TEQSA for the opportunity to contribute to the review of making and assessing claims of scholarship and scholarly activity.

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