

SUBMISSION

Submission to the Tertiary Education Quality and Standards Agency

Making and Assessing Claims of Scholarship and Scholarly Activity

18 December 2020

Overview

TAFE Directors Australia (TDA) welcomes the opportunity to make a submission in response to the Tertiary Education Quality and Standards Agency's (TEQSA) review into scholarship and scholarly activity to inform its *Guidance Note: Scholarship*.

Of the 27 tertiary institutes that are members of TDA, nine TAFEs are registered as Non-University Higher Education Providers (NUHEPs), with a further six TDA members as TAFE divisions of dual sector universities¹. TAFEs are also significant educators at the diploma and advanced diploma level.

Scholarship is an important function for TAFE institutes. Initial research recently undertaken by Australian universities, in collaboration with universities internationally, for an Australian Research Council discovery project *vocational institutions, undergraduate degrees*, suggests, amongst a range of positive outcomes, that:

- Degrees at TAFE are oriented to industry needs and prepare students for employment in specific occupations, often in new areas of para-professional work;
- Degrees at TAFE provide distinctive learning environments built on experiential and practical pedagogies facilitated by small cohorts and small class sizes;
- Students' reasons for selecting higher education at TAFE stress the student experience and learning style, alongside identifying the relevance of the degree for their chosen field of employment; and
- Designers of individual TAFE degrees are able to be highly responsive to the needs of industries and employers.

¹ <https://tda.edu.au/tda-and-tafe/highered-and-tafe/>

The Dissemination Report² provided a number of findings (see a summary at [Attachment A](#) to this submission).

The global nature of competitive economies, based on comparative advantage, places even greater emphasis on scholarship that adds to knowledge and informs improvements to courses of study and associated learning outcomes for all tertiary students undertaking a course of study.

We are in an era, and have been for some decades, of a post-industrial economy. Australia needs a post-industrial tertiary education sector, of which scholarship is one pillar. Our competitor national economies have already recognised this need. TDA welcomes any opportunity to contribute to Australia adopting public policies that realise shared economic, social and democratic benefits of the next golden era of economic prosperity.

In response to TEQSA's discussion paper of October 2020 *Making and assessing claims of scholarship and scholarly activity*, TDA supports the classification of an activity as scholarship for regulatory purposes through the proposed four principles in the discussion paper. At this point we do not suggest any additional or alternative principles.

TDA contends, though, the opportunity ought to be taken to consider the role of scholarship in the broader post-school education and training context. A more detailed description is given in [Attachment B](#) for consideration of TEQSA. TDA will be sharing these thoughts more widely within the VET and higher education sector, including with the Australian Skills Quality Authority (ASQA).

Proposed Principle 1

To provide evidence of scholarship for regulatory purposes, the proposed scholarly activity must be consistent with an established typology of 'scholarship'.

Given this context, it is clear scholarship and scholarly activity manifest in a variety of practices. TDA acknowledges TEQSA's recognition that the nature of scholarly activity and evidence of such outputs may vary between campuses, but that it is also reasonable to expect scholarly activity and output at all campuses of an institute. There is an expectation on TAFEs, by their very nature including for higher education offerings, to be highly responsive to the needs of industries and employers. We understand the need to evidence this at all TAFE campuses from which such offerings are delivered³.

² [The-Value-of-Higher-Education-at-TAFE-ARC-Report-May-2020.pdf \(tda.edu.au\)](#)

³ TAFEs are well versed in evidence, if anything just to meet the prescriptive regulatory oversight of the Australian Skills Quality Authority and the Department of Education, Skills and Employment, both of whom extensively regulate the vocational sector.

TDA supports TEQSA's continued adoption and adaptation of Dr Boyer's model of scholarship. While it is true in the broad, and at first brush, TAFE higher education is more directed to teaching than discovery, it is not exclusively teaching as indicated above. Given the composition of the Australian economy, dominated by small and medium sized enterprises, and the global nature of competitive economies based on comparative advantage, greater emphasis on practice-based innovation and applied research is increasingly becoming a key focus of discovery⁴. If Australia is to be competitive, especially in our region, public policy settings needs to acknowledge this reality.

TDA seeks to continue to work with TEQSA on recognising, and the embedding of, practice-based innovation and applied research across the tertiary education sector.

Proposed Principle 2

Evidence of scholarship must include demonstrable links to intended outputs or outcomes of that scholarship and be accompanied by mechanisms to monitor and evaluate those outputs or outcomes.

TDA fully supports a downstream impact of scholarship should be in support of course content, course design, or improved learning outcomes. Monitoring and evaluating outputs and outcomes of scholarship are necessary for the demonstrated realisation of the benefits of scholarship.

While implied, Principle 2 may benefit for being explicit that not all scholarship should lead to change. TDA, and the vocational sector, know this well. Much scholarship reinforces existing understandings, practice and teaching, while still adding to knowledge and still able to inform. TAFEs, in working closely with industries and employers in an era of rapid technological and economic change, are constantly testing advances in their field of endeavour, practice and innovation. They then, through institutional learned behaviours, adapt and adopt course content and course design to improve learning outcomes.

The need for the learning outcomes of their students to keep pace with change in the economy and in industries, and the resultant need for TAFEs to adapt the teaching of their discipline, is in the TAFE DNA. It is explicitly important to evaluate discovery, particularly as to the material benefit of adopting the outcomes or outputs of discovery. More so than other sectors of Australian tertiary education, TAFEs are held to the ultimate test of the learning outcomes of their students by employing industries and those that measure or monitor employment outcomes.

⁴ <https://tda.edu.au/tda-and-tafe/practice-based-innovation-and-applied-research-and-tafe/>

The Network of TAFEs, under the umbrella of TDA, and associated TAFE policy and practice networks are ideal vehicles for dissemination and peer-peer accountability. TDA also holds a range of forums based around TDA's annual convention⁵ to disseminate lessons learned from scholarship.

TDA's Chief Executive Officer is also the Chair of the World Federation of Colleges and Polytechnics⁶. TDA and its members play an important role in WFCP Affinity Groups⁷ in disseminating international scholarship throughout the Network of TAFEs and, as importantly, disseminating TDA member scholarship internationally.

Proposed Principle 3

Activities such as professional and community engagement, professional development and routine professional/artistic practice will not be regarded as scholarship unless they meet the requirements of Principles 1 and 2.

TDA agrees scholarship should be an activity undertaken with 'purpose'. Scholarship should be highly valued. As noted above, there needs to be a strong link between scholarship and adding to knowledge and to informing teaching and learning. It needs to be based on an evaluation of the material benefit of the evidence from the scholarly activity and the monitoring and evaluation of the application of the evidence to teaching and learning.

TAFEs engage in a whole range of activities that involve stakeholder engagement or representation in their community. We would not regard these as scholarship, except where this engagement is applied to course content, course design, or improving learning outcomes of students, especially from engagement with industries and employers.

Proposed Principle 4

Providers will be able to present a plan to create an environment of scholarship, which is monitored and reviewed, together with an aggregate representation of their involvement in scholarship within the context of the requirements of the HES Framework.

The very nature of the TAFE environment creates a necessity to focus on monitoring of all activities, but especially those related to course content, course design, or improving learning outcomes of students. The reputation of a TAFE is determined at the aggregate, which means monitoring, review and improvement mechanisms are a key focus of TAFE executives and their academic boards.

⁵ [TDA Conventions – TAFE Directors Australia](#)

⁶ [WFCP: World Federation of Colleges and Polytechnics – TAFE Directors Australia \(tda.edu.au\)](#)

⁷ [Affinity Groups - World Federation of Colleges and Polytechnics \(wfcg.org\)](#)

Given scholarship, as it is proposed, is integral to the tertiary education provider in upholding its reputation and that of the sector then TDA suggests a provider should be able to demonstrate scholarship is monitored and reviewed at the aggregate level.

For TAFEs, as part of an Australia wide network that includes TAFE policy forums and peer networks, the monitoring and review of scholarship also occurs at system level.

Proposed Principle 5

TEQSA will accept different approaches to scholarship that reflect the nature of the provider.

TDA is supportive of the recognition of scholarship where this is integral to the provider in upholding its reputation for adding to knowledge and to informing the provider's course content, course design, or where scholarship contributes to improved learning outcomes of the provider's students.

TAFEs are conscious of upholding the reputation of the Australian tertiary education sector and of the reputation of the Network of TAFEs across Australia.

Practice-based innovation and applied research, that is innovation driven by doing, using, and interacting, is as valid as science and technology-based innovation. The four components of innovation within firms and industries may cover: product (goods/services); processes of production (place based or distributive); distribution or logistic chains; organisational (why organise and how); and marketing (producer and consumer). All these innovation types are the natural domain of TAFE, both vocational and higher education, with these components responding best in a TAFE/firm/industry/student eco-system of practice-based innovation and applied research.

Innovation is more than the linear journey starting with science, research, and hopefully ending with transformation to the commercial world. Transformation can also have its origins in practice-based innovation and applied research. A practice-based and applied research approach to innovation operates at the interaction between the two sub-systems of innovation – acquisition and assimilation of knowledge and the transformation and exploitation of knowledge.

Whether the term 'research' is used or not to describe this activity in TAFEs, for vocational and higher education, TAFEs with their industry, employer, and community partners continually undertake this scholarly activity as a collaborative exercise in discovery.

Given the nature of scholarship and scholarly activity, it is possible TAFEs at times may not recognise the research and activities they undertake, or the plans or systems they have in place,

reflect discovery of knowledge or reflect support in the refinement of course content and course design, or improved learning outcomes. It is likely, instead, TAFEs would describe this as business as unusual. For example, peer review and feedback from students informing curricula, course content, and course design; staff demonstrably up-to-date with research in the areas they teach, and this knowledge being applied to their teaching activities; and effective implementation of course development and review polices are generally thought of a business as usual for TAFEs.

On this TDA seeks that not only, as part of its regulatory role, TEQSA assesses evidence of 'scholarship' that is put forward by providers, but that TEQSA continues to actively engage with providers, especially NUHEPs, and more broadly, to assist in identifying and recognising scholarship and scholarly activity as it is undertaken and, where possible and appropriate, disseminate those findings. TDA seeks to work collaboratively with TEQSA to fully realise the benefits of this wider engagement on scholarship and scholarly activity, in the national interest.

The test as always for TAFEs is the job-ready nature of their graduates. A test undertaken by industries and employers on a daily basis, and one that is closely watched and monitored by those that measure employment outcomes of TAFE vocational and higher education graduates.

Australian Research Council Discovery Project: Vocational Institutions, Undergraduate Degrees

Research into Vocational Institutions, Undergraduate Degrees contributes new knowledge on the expansion of Australia's higher education system through the growth of bachelor degrees in state based public providers of vocational education and training, the TAFEs.

The project identifies the range, scale and distinctiveness of this provision, along with understandings about the students undertaking these degrees and their experiences. The project provides insights for policy and practice at national, state and institutional level to reform higher education into a more equitable lifelong learning system to meet the needs of new students, especially of mature age, to obtain high level qualifications demanded for national innovation and economic restructuring. The findings drawn from the various data gathering methods were validated in a stakeholder exercise in Summer 2019/20 and can be summarised at a high level as follows:

Research Question 1: How do TAFE Institutes represent themselves and their degrees through their marketing positioning practices and strategies in relation to other higher education institutions?

- Higher education offerings in TAFE Institutes have grown from within, in an organic way and the growth has responded to local contexts and institutional strengths;
- TAFE Institutes present degree offerings as part of a continuum of vocational qualifications;
- TAFE Institutes suggest that their degrees are oriented to industry needs and prepare students for employment in specific occupations, often in new areas of para-professional work;
- Degree provision in TAFE Institutes is suggested to provide distinctive learning environments built on experiential and practical pedagogies facilitated by small cohorts and small class sizes.

Research Question 2: Which students are choosing vocational institute degrees and why, and what messages about TAFE Institutes and their degrees do prospective and current students and employers find persuasive?

- Higher education offerings in TAFE Institutes attract specific cohorts of students, especially those of mature age and from non-English speaking background (NESB);
- TAFE students enter bachelor degrees via diverse pathways, including previous study in VET and in higher education; the majority enter based on a portfolio of assessments and experiences, rather than an ATAR score and progression from year 12;

- Students' reasons for selecting higher education in TAFE Institutes stress the student experience and learning style, alongside identifying the relevance of the degree for their chosen field of employment.

Research Question 3: How are other higher education institutions representing themselves and their degrees in response to the expansion of TAFE Institutes and possibilities of vocational distinction in the higher education field?

- Degree provision in TAFE Institutes is suggested by higher education institutions to provide distinctive learning environments for particular purposes, and often different from the environment in universities;
- Higher Education provision in TAFE competes in a complex and precarious market and operates under different funding arrangements from the universities;
- Institutional competition is localised and operates on a program by program basis dependent on distinct institutional missions and the prevalence of universities with dual sector engagement.

Research Question 4: How are governments and national higher education organisations steering and/or responding to the growth of higher education in TAFE Institutes?

- The lack of a national strategic imperative to expand higher education in TAFE Institutes impacts equity and access to higher education in TAFE Institutes because different funding models operate (at state and federal level) for students and institutions in the VET and higher education sectors;
- Despite the debates on higher education sector expansion, there is little evidence of policy support across all jurisdictions for horizontal differentiation in higher education provision to meet market need;
- TAFE Institutes are providing bachelor degrees in a national policy vacuum with little influence in higher education policy conversations, in spite of the recognition of the niche role that higher education in TAFE Institutes provide indicated by some national organisations;
- Expansion of higher education provision in TAFE Institutes varies across states and territories and no systematic approach across the country is noted.

Role of Scholarship in the Broader Post-school Education and Training Setting

In providing a response to the TEQSA discussion paper, TDA recommends it is used as the basis for reform for commencement of integrating vocational and higher education, which has been the aspiration for some time within the polity and with ministers.

TDA sees scholarship as the central operating principle of tertiary education. It is the internal quality assurance tool, which also underpins self-accreditation within higher education institutes.

For this reason, the approach to be taken by TEQSA in describing and then assessing scholarship is central to the success of higher education outcomes, especially in relation to advancing the field of knowledge and thereby the depth and effectiveness of research.

Scholarship is not solely the domain of higher education, however. It naturally reaches into vocational education as a quality concept. Emeritus Professor Valerie Braithwaite in her report on *ASQA – All eyes on quality: Review of the National Vocational Education and Training Regulator Act 2011 report January 2018* – summarises the blend between the sectors.

In the past a sharp line has been drawn between education and training, teachers and trainers, and students and learners. The divide is captured by universities at one extreme with a quest to discover new knowledge, and vocational education at the other extreme with a quest to apply knowledge and develop practical skills. The distance between institutions that deliver academic and applied skills, however, is being fast whittled away.

Scholarship, therefore, has broader application, especially if the revised Australian Qualifications Framework (AQF) is to be realised and if VET qualifications are to be modernised.

Account should be taken of the Revised AQF

The Government has endorsed the revised AQF with the intention there be further design deliberations as recommended by the review panel. While it is disappointing this work does not appear to have been progressed, many design elements are set. This includes that the distinguishing features across qualifications are their attributes rather than their expected outcomes. The review panel stated that the current AQF outcomes project the expected work context of qualifications, but this is not realistic for many qualifications and is variable across qualifications at the same AQF level.

As stated in the report, 'the Panel supports ACER's proposal for qualification types to specify features for qualification design, rather than graduate outcomes. The practical application of this

approach is that the AQF would stipulate that 'qualifications of this type will incorporate the features specified by the descriptors of Knowledge, Skills and Application in the qualification type.'⁸

Further, the proposed AQF has knowledge as the sole discriminator across the proposed eight level framework. Therefore, how knowledge is utilised, curated or developed via scholarship in qualifications becomes critical across the full gamut of qualifications.

VET should rely more on Scholarship

The design and delivery of VET has a strong reliance on scholarship, however, it does not register strongly in regulatory instruments.

The competency model, which underpins virtually all VET delivery, is based on specification of standards of performance expected of workers in occupations. Accreditation specifies these standards and associated assessment conditions and outputs, with the registered provider delegated the role of course design and content. The intent of this standards model is to afford flexibility in course design, content and delivery to suit the circumstances of the learner cohort and the industry or enterprise being served. The way scholarship is deployed in this process is the key to successful vocational education.

Scholarship, to the extent it brings knowledge to life for learners, arguably is the most critical element for success in vocational education. Its significance in vocational education reform should not be under-estimated for the following reasons.

- As Australia increasingly becomes a knowledge and service economy, the application of knowledge is critical across most forms of economic endeavour, including the intermediate occupations VET learning supports.
- Research by Jean Gamble⁹ shows that, even in 'craft' based skills, knowledge in various domains underpin production and fabrication – as shown in Diagram 1 below.
- The accreditation framework for VET, in the form of national training packages, specifies the knowledge elements that underpin the acquisition of competency. As TDA has stated many times publicly, these are simply a list of knowledge elements the provider is expected to curate into relevant and structured knowledge to support learning. It is almost inconceivable there is quality in knowledge acquisition when there is such randomness and around 4000 individual providers with autonomy to apply these elements as they see fit.

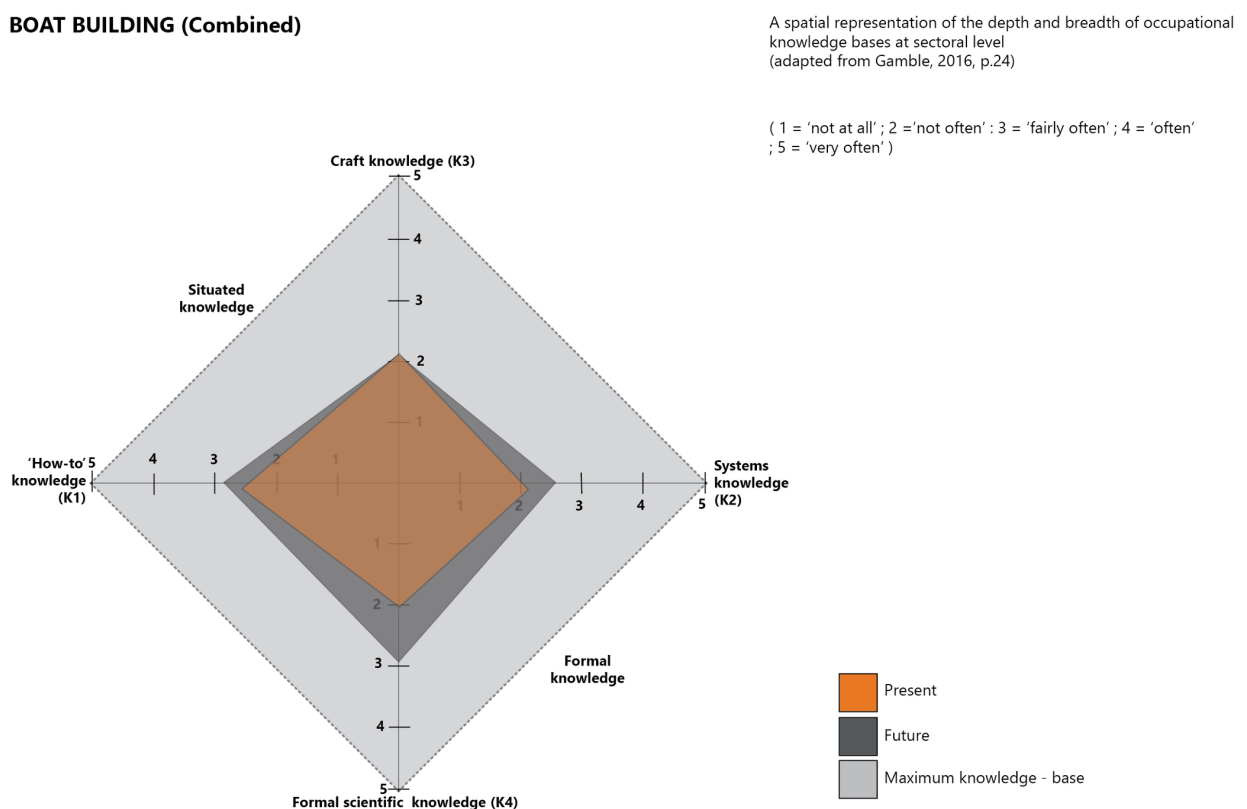
⁸ <https://www.dese.gov.au/uncategorised/resources/review-australian-qualifications-framework-final-report-2019>

⁹ Jean Gamble, from *Labour market to labour process: finding a basis for curriculum in TVET* 2016

- While broad in characterisation, many vocational education students do not present with as well-developed approaches to knowledge acquisition and synthesis typical of Blooms taxonomy, which in the main underpins the higher education learning model. Scholarship is therefore the ‘magic’ of bringing knowledge to participants in VET.
- Global measures such as PISA and PIAAC show that too many Australians do not hold sufficient levels of foundation skills in literacy and numeracy. A recent report by ACER for the Department of Education, Skills and Employment (on another matter) highlights core skills in literacy and numeracy underpin syntax and language strategies to assess whether fact or opinion is being offered. Students with these difficulties, therefore, need major investment to operate with autonomy and agency to succeed in the Australian community. These are not matters learnt by rote but entail sophisticated approaches to scholarship, especially in an adult learning context.

Diagram 1

BOAT BUILDING (Combined)



While many commentators would argue the ultimate in scholarship is new knowledge, an equally critical outcome is building new knowledge in people. The ultimate objective of education is agency and self-sufficiency for its students and that must come about by the power of knowledge in the hands of individuals. The challenge, therefore, is significant in the VET sector.

There is much debate in the VET sector at present about qualification reform and ASQA is in the throes of moving to a provider self-assurance quality strategy. It is easy to see, therefore, how scholarship practice should become central to reform success.

If we are to get Credit Working

The notion of scholarship is more than just contiguity within higher education. The deep-seated logic of the AQF and a long held vision for post school education is that anyone, regardless of education background and standing, can start at a point in the tertiary system and build their way to higher qualifications. This concept is fundamental to the notion of equal opportunity as the outcome of the acquisition of knowledge and skills through education, irrespective of background, that in the end underpins Australia's democratic institutions. This is not just a matter of conceptual public policy theory, but in post-industrial, globally competitive and integrated national economies, is one of national interest.

The failures in this objective are profound and have been longstanding. There is an opportunity now for this to be addressed through the combination of VET qualification reform, the revised AQF and now this TEQSA led work on scholarship.

The way scholarship is embedded across the qualifications hierarchy, especially in related fields of education and industry, is the first step in overcoming the inbuilt biases in recognition and credit systems.

Application of scholarship should align with context

A primary consideration in relation to regulation is proportionality, which essentially trades risk and reward. The new provider category standards for higher education, now passed into law, imply a hierarchy of standing and importance, most pronounced by conferring university standing and, with it, self-accreditation. Given the new standards imply the sector may diversify, which we understand was an intent of the policy reform, including that some universities may revert to teaching only institutes, the notion of the source and application of scholarship becomes important.

It may be in this context that different applications of the notion of scholarship is explored. Scholarship has different functions to support different outcomes. Scholarship underpins new teaching arising from research which in turn builds capacity for further research and advancement of knowledge. Scholarly activity is the dissemination and application of that knowledge arising from research, but is equally valid across the tertiary sector.

In view of the broad factors outlined above TDA recommends TEQSA seizes the opportunity currently presented to lead a wider debate on scholarship and self-accreditation across the tertiary education sector as a contribution to the many areas of policy and regulation that need serious attention if the vision of a connected post-school education and training system is to be realised.