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Dear Christine

**Re: Mapping of professional accreditation in the context of higher education regulatory and standards frameworks**

The Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH) is the authoritative agency on research, teaching and learning for the Arts, Social Sciences and Humanities (ASSH) in Australian and New Zealand universities.

DASSH supports those within these institutions who have responsibility for the governance and management of research and teaching and learning in their universities. DASSH also supports those who aspire to these positions through a Network of Associate Deans (Learning and Teaching) and a Network of Associate Deans (Research).

DASSH welcomes your request for input on professional course accreditation practices in Australian higher education, particularly in the ASSH disciplines, and we attach our response to the call for comment.

Please contact me if any further information is required.

Yours sincerely



**Professor Susan Dodds**  
**President**  
(and Dean, UNSW Arts & Social Sciences)

## 1. What is the practical impact of professional accreditation on institutions?

For professional registration in many occupations within the arts, social sciences and humanities (ASSH), graduation from an accredited course is a requirement. External accreditation provides these courses with an industry standard “quality” mark that is both recognised and valued by employers and prospective students. Professional accreditation attached to these courses boosts student recruitment and graduate employability.

In general, academic units within the ASSH disciplines welcome professional accreditation, particularly where it is fundamental to the requirement for professional practice across the range of courses on offer. However, in some areas, professional accreditation lags behind industry standards, for example by failing to adapt to new digital techniques, and is not held in such high regard by employers. In such cases, the burden on institutions can be disproportionate to the eventual benefit to graduates.

Professional accreditation processes differ significantly between disciplines and courses and it is rare to find coordinated approaches within and between academic units. In practical terms, this places significant responsibility on individuals; in cases where staff turnover is relatively high, this means there can be limited continuity between accreditation cycles, which are typically at five year intervals.

Across the ASSH disciplines, significant academic and professional staff resource is required over a period of several months per course to support the professional accreditation process. This is particularly burdensome for courses where staff and student numbers are low resulting in a significant drain on resources for these disciplines. DASSH proposes that a more efficient approach would be to ask institutions to conduct an audit and review around key priority areas and report on these.

## 2. Are there advantages and/or disadvantages to professional accreditation processes as they are currently managed? What are they?

DASSH recognises the benefits of accreditation to our disciplines and to our students, noting that accreditation provides a strong sense of professional identity and, more importantly, provides a route to legitimate (or in some cases, legal) professional practice. In addition, consistency at national level enables benchmarking and helps to demonstrate the value and relevance of courses to prospective Australian and international students.

Professional accreditation contributes a greater sense of standing and recognition for a course, which is easily articulated to outside audiences; it creates more significant networking pathways for students and graduates which are particularly important given the rising profile of Work Integrated Learning; and it facilitates working relationships between academics and industry, creating greater opportunities for research and teaching collaborations. The requirements of professional accreditation bodies also provide direction on evolving priorities within the profession.

DASSH acknowledges that there are a number of advantages to professional accreditation processes as they are currently managed. These include providing clarity about accreditation requirements, including the structure and focus of professional placements. On the whole, the quality of written guidance is often very good. However, it would be useful in the lead up to a five year accreditation process if greater emphasis was placed on briefing. Within academic units, the rigidity of some

accreditation regimes provides welcome stability, albeit at the cost of curriculum development. Some accreditation processes are managed online, limiting the burden of work on institutions and creating a framework for consistent reporting practice and data/records management.

DASSH supports the practise of the periodic cycle of professional accreditation. This structure provides a useful framework for reviewing program content and structure in light of the evolving requirements and priorities of the profession. It also provides opportunities for consultation with key stakeholders, students, staff and industry partners.

The major disadvantage of the current professional accreditation processes for the ASSH disciplines is that they are largely managed separately from other processes and records tend not to be maintained centrally. Accreditation is typically managed on a five year cycle and in practice there is little continuity between cycles. With the beginning of each new cycle, academic and professional staff tend to create new processes and documentation, with limited benefit of experience from previous cycles. Within each institution, the process can rely heavily on individuals and there is a significant benefit when individual academics have an existing relationship with the accrediting body.

### **3. Are there trends emerging in professional accreditation that you are aware of and are the bodies you are associated with adopting them? What new approaches are emerging?**

A number of professional institutions are seeking to streamline accreditation processes while maintaining standards. Processes are becoming more focussed on outcomes than inputs. This can be seen, for example, in Social Work where moves towards practitioner registration have been welcomed.

In addition, alignment between Tertiary Education Quality and Standards Agency (TEQSA) requirements and those of the institution are becoming more obvious and there is a greater emphasis being placed on Work Integrated Learning activities, which DASSH welcomes.

One aspect of concern for DASSH is that institutions that do not provide digital offerings (those in which courses are offered on a face-to-face basis only) continue to dominate conversations and review panels. Online engagement through quality innovative pedagogies is often undervalued by accrediting agencies; nevertheless there is increasing recognition that this mode of flexible learning suits the needs of students and opens opportunities.

### **4. Does accreditation make innovation in course design more difficult, or does it encourage innovation?**

As teaching increasingly moves online, and teaching and practice increasingly incorporate new digital techniques, DASSH stresses that it is vital that this is reflected in accreditation frameworks.

DASSH believes that professional accreditation does not invariably stifle innovation. This is particularly true in programs where core competencies and requirements are not onerous and provide room in the curriculum for flexibility elsewhere, and where innovation is actively encouraged by the profession. However, in some cases, compulsory elements (for example, stipulated requirements for content, work placements and face-to-face time) can crowd out non-compulsory course elements, limiting the ability to offer distinctive education that reflects a particular institutional mission. This is the case in Social Work and Education. In such cases, the resources and

time needed to ensure compliance can limit capacity for innovation, even where this is permitted within the curriculum.

DASSH cautions against professional accreditation processes that may inadvertently stifle innovation, as a result of real or perceived limitations within the accreditation framework. The high priority given to professional accreditation can cause staff and students to infer that electives, including languages, liberal arts, problem-based learning modules and non-compulsory industry or international placements, are of lower quality or less valuable to employers.

**5. How do international professional recognition requirements impact on course design in your discipline(s)? Do these requirements mesh easily with internal academic quality assurance, the HESF and the TEQSA process? What, if any, are the problems?**

The Australian Quality Framework (AQF) is a key tool for framing discussions about course structure and compliance with prospective international training and accreditation partners. Where international accreditation requirements are considered informally in course design, the direction taken tends to reflect the international focus of the course leader.

In Social Work, for example, a key international professional recognition requirement is 1,000 hours of field education training. This requirement heavily informs the design of social work academic courses all over the world including ours. No notable conflicts have been reported with internal academic quality assurance, the HESF or the TEQSA audit process. However, there is a slight issue between the Australian Association of Social Workers' (AASW) guidelines relating to the Master of Social Work as a qualifying degree and the higher level learning expectations for graduate courses under the HESF process. This issue has been resolved at one of the DASSH member institutions by one course leader articulating program learning outcomes as preparing graduates for leadership and innovation.

The situation is slightly different in Architecture. The Landscape Architecture accrediting body (AILA) signals that an AQF 8 qualification is needed for full membership. A level 8 can be achieved in either an Honours year or a Graduate Diploma – but these are not equivalent learning experiences. This is just one example of where, in some cases, accrediting bodies have not fully thought through the relationship between AQF 7 degrees and an Honours year.

**6. What could be done to streamline the various regulatory, quality assurance and professional accreditation processes to reduce the burden on institutions?**

DASSH believes that many professions would benefit from linking the completion of an accredited course with a career-long suite of skills development and compliance training and testing for practitioners, overseen by national bodies responsible for maintaining professional standards. In some cases, responsibility for malpractice is seen to be the responsibility of institutions providing the initial training; however, professional accreditation of a preparatory course does not address the issue of maintaining fitness to practice throughout a long career. Equally, there would be advantages in consolidating Australian national standards, where accreditation is managed at state level.

Timescales and tight deadlines are an issue which could be easily addressed by ensuring that institutions, and not just individual academics, are aware of significant deadlines well in advance. Access to guidelines and briefings well in advance of accreditation visits would help staff prepare. DASSH believes that the administrative burden could be further reduced if accrediting agencies were

able to access relevant institutional data submitted for other regulatory requirements. DASSH also recommends the central management of accreditation materials within higher education institutions. This would ensure their future availability, regardless of staff changes and internal restructuring.

DASSH urges professional bodies to accept that TEQSA has considerable responsibility for quality in higher education and be assured of adequate quality processes with the institution. We propose that this could be managed explicitly by opening a dialogue between TEQSA and the accrediting bodies. Collaboration between quality assurance and accreditation agencies and processes would reduce workload overlap and release academic time to invest in high quality conversations about learning and teaching to inform course development.