

IRU Response: Higher Education Standards Panel's Advice on the impact of Professional Accreditation

The IRU supports the conclusions of the Higher Education Standard's Panel advice on the impacts of professional accreditation.

To formalise the expectation that the professional bodies focus on profession specific matters that the standards do not already address is a necessary step.

It is important that the work of the professional bodies fits within the overall quality assurance arrangements as defined by the Higher Education Standards and monitored by universities and TEQSA. It is crucial that both operate to allow development of the delivery of higher education to keep step with changing needs, while ensuring all delivery meets minimum expectations.

Recommendation 1 – Limiting professional accreditation to profession-specific matters via a legislated code of practice

The IRU supports the recommendation of limiting professional accreditation to profession-specific matters not already assured by the Higher Education Standards Framework under the *TEQSA Act* through adoption of a legislated code of practice, in the form of a disallowable instrument (Option B).

As self-accrediting institutions, Australian universities both lead the development of higher education practice and adhere to a variety of quality assurance procedures, including registration by TEQSA and compliance with the Higher Education Support Act 2003. The quality of teaching is also subject to scrutiny through student performance and graduate outcome reporting and the expression of student feedback through multiple channels.

Professional bodies are a valuable source of expert advice on profession-specific matters and they facilitate stakeholder engagement. When targeted and implemented in partnership with the registration processes of TEQSA, professional accreditation helps maintain professional standards and supports graduate mobility. However, accreditation processes are often labour intensive and expensive (both to universities and accreditors), particularly when the expectations are unclear or overlapping. Generally, professional accreditation requirements should be clearly justified and restricted to profession-specific matters where broader quality assurance processes are insufficient and other less costly alternatives cannot achieve comparable outcomes.

The Philips KPA report, *Professional Accreditation- Mapping the territory*, outlines numerous positive examples of where professional accreditation has been implemented in partnership with existing requirements. However, the report also includes a minority of cases where professional accreditation panels lack independence and transparency, or deviate from the scope of their responsibility.

The Griffith University submission also sets out examples of the problems that can emerge where professional accreditation reaches beyond its remit.

At the very least, this has led to a duplication of effort and additional costs. In the worse cases, it involved conflicts of interest, illegitimate restrictions for entry into professions, and undermined the freedom of universities to design curriculum and implement innovative approaches to teaching. Limiting the role of professional accreditation to clearly defined and profession-specific matters is, therefore, appropriate.

The 2016 Universities Australia and Professions Australia *Joint Statement of Principles for Professional Accreditation* provides a guide for how to delineate clearly between the scope for university self-accreditation processes and professional accreditation. However, as a non-binding statement, it is insufficient to ensure accrediting bodies remain within the remit of their professional knowledge, avoiding some of the negative outcomes included in the Philips KPA report. Therefore, the IRU supports recommendation for a legislated code of practice (Option B) over voluntary measures (Options C and D).

Recommendation 2 – Using TEQSA to build capacity within professional bodies

It is sensible to use TEQSA's expertise to guide and support accrediting bodies towards outcomes focused, risk-informed and context aware assessment policies and practices. Capacity building programs will help improve consistency of professional accreditation, the effectiveness of the legislated code of practice (Recommendation 1) and the potential for streamlining approaches to accreditation.

Recommendation 3 – Stakeholder forum for streamlining professional accreditation

A stakeholder forum on the future of professional work and how to streamline accreditation processes could be a useful event to encourage creative responses to how the growing array of defined professions should respond to predictions of continued disruption to assumptions about work.

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