Quality Assurance Framework

Introduction

From its earliest days, the College of Law (COL) has used data and other qualitative information to inform the fitness for purpose, evolution and improvement of its offerings.[1]

The data is considered at various levels of the organisation with a view to ascertaining student outcomes, identifying problems and targeting improvement. It also used to inform self-assurance of our compliance with the Higher Education Standards (the Standards).

Besides the many papers that go to the Board of Governors (BoG), Academic Board (COLAB), and Executive Committee (ExCo), key repositories of data and analysis are:

- Academic Baseline Report (ABR)
- Academic Risk Register (ARR)
- Standards, Quality & Risk Framework (SQRF)

The ABR is a compilation of data sets which are periodically analysed and triangulated to make inferences regarding the key quality question: how do we know that what we do is actually any good?[2]

The ARR identifies a number of academic risks and assesses on likelihood of occurrence and potential impact in the same way corporate risks are assessed.

The SQRF is a compilation of the Higher Education Standards with some brief narrative as to how The COL satisfies each Standard, listing also relevant documents, data collections and identified academic risks. This is a live document, periodically reviewed and updated to show compliance (and the COL's approach to compliance) with the Standards.

The goal is not only to satisfy all Standards but to be regarded by TEQSA as an exemplar – especially with regard to teaching and learning and positive student outcomes.

Authority & Responsibility for Quality Assurance

All staff members are responsible for assuring the quality of College Programs and satisfaction of the Standards but those with primary responsibility (under the corporate and academic boards) are those identified as having executive accountabilities most aligned with relevant Domains / Standards. All such executives are required to monitor and report on activity which affects our compliance with the Standards.

Those executives, in performing their quality and self assurance functions, employ the tools and methods outlined below.

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[1] This Quality Assurance Framework was first created in July 2024 but describes policies and processes which have existed for many years. The Framework seeks to describe in one place the COL's holistic approach to quality assurance which is relevant also to self-assurance.

[2] This question was posed to the COL by Prof Geoff Scott in 2007 when we were preparing for our first AUQA Audit and has driven thinking regarding academic quality and self-assurance ever since.

Collection of Data

The College collects a range data in order to investigate the quality and effectiveness of its award Programs:

- Graduate Diploma of Legal Practice (the PLT Program)
- Master of Applied Law and nested awards (Practitioner Education)
- Master of Legal Business Management (Practitioner Education)

Data regularly collected by the COL includes:

- Enrolment data
- Completions (PLT)
- Attrition (Practitioner Education)
- Grade averages
- Student Satisfaction (end of course/subject)
- QILT
- Student Confidence (PLT)

Additional Qualitative Information includes:

- Benchmarking reports
- Curriculum Advisory Committee minutes
- External Moderation reports
- Employer Satisfaction reports (informal)
- Course Review Panel reports

Further Qualitative Information not relevant to triangulation but still informative includes:

- Support for Students register
- Academic Conduct investigations

Use of Data

Enrolment data – the COL monitors enrolments as an indication of graduate satisfaction (leading to word of mouth marketing) and also for financial viability and budgeting purposes. It is important to know that graduates (and their employers) are happy with the quality of the COL's offerings to both to reinforce the COL's "brand" and to assure a prudential approach to budgeting and resourcing. After 50 years in operation the COL's forecasts regarding enrolments data have been reasonably accurate.

Completions (PLT) – one of the key outcome rates examined in higher education is attrition, but attrition is not a relevant measure in PLT as there is only one enrolment event. (The attrition rate is calculated as: enrolled in Year X but did not complete or re-enrol in Year X+1). As attrition cannot usefully be calculated for PLT students, The COL focuses on completion with the two measures being completion of Coursework within 12 months of commencement; and completion of All Components within 12 months of commencement of Coursework. Typically, the COL expects to see about 96% for Coursework and about 85% for All Components. Given the availability of transfers and deferrals, Completion of All

Components within two years tends to be around 95% and completion of All Components within the maximum four years is over 99%. The only students who fail to complete after four years tend to have undergone a major career change, suffered significant health issues or other significant change.

Attrition (Prac Ed) – as noted above, the attrition rate is calculated as: enrolled in Year X but did not complete or re-enrol in Year X+1. Practitioner Education uses multiple enrolment events (usually over years) so this calculation is highly relevant to the quality of that Program. The COL normally sees an attrition rate somewhere between 20 and 30% - which is higher than the sectoral median – but COL students are all adult learners with work/life contingencies which can see their studies delayed.[3] The COL has several times proposed to TEQSA that a different attrition calculation for postgraduate students would better reflect the work/life reality of adult learners.

Grade averages – calculated by subject and state (PLT) and solely by subject (Prac Ed) for every calendar year (and cohort event for internal moderation) are the key academic quality measures for the COL, with the caveat that these measures mean nothing without appropriate triangulation. Grades can be distorted by a range of factors including level of materials; level of teaching; level of assessment and student engagement. Accordingly, external moderation of grades and assessment instruments, and the minutes of Curriculum Advisory Committees are important cognate sources for triangulation purposes. Employer satisfaction is also important where available.

Student satisfaction (end of course/subject) – the COL routinely runs end of course surveys for PLT students and end of subject surveys in Prac Ed. The surveys ask students to rate the following on a five point Likert scale:

- Overall Learning
- Useful Materials
- Appropriate Assessments
- Learning Portal
- Role of Lecturer
- Net Promoter Score
- Response Rate (separately calculated by the COL)

The first five bullet points target a benchmark result of 4.0 and in most cases exceed benchmark. Net Promoter Score is the measure of students who would recommend the COL to prospective students scoring 9 or 10 (Affirmative) on a ten point scale, less those who rate below 7. The benchmark of 30% is regarded as positive. Response Rate aims for a benchmark of 70%.

QILT – is the government's centralised and objective graduate survey system which asks graduates to rate their educational experience across a broad range of factors. The scores are used to help TEQSA determine what level of risk characterises each provider and in turn what level of regulatory scrutiny is warranted. This measure ought to corroborate the COL's own surveys but traditionally there are disconnects and conditions which appear to have a downward effect. See academic risk below.

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[3] The official TEQSA rate (for the COL) is distorted by the fact that they include PLT and Prac Ed together. The only PLT students who look like attrition are those who have transferred or deferred across multiple calendar years, so the high completion rate brings down the true attrition rate in Prac Ed.

Student Confidence (PLT) – is a series of questions regarding a student's confidence to practise in given areas of law at the beginning and end of the PLT Program. The end of course score (hopefully) shows a rise in confidence as a direct result of having undertaken the course. This is therefore a measure both of student confidence and fitness for purpose of the PLT Program.

Benchmarking Reports – have evolved significantly over the years given the COL's market leading position and the unwillingness (therefore) of smaller providers to engage on a data-sharing basis. The current approach is to do regular audits against the HE Standards and compare what others are doing so far as can be gleaned via public websites. The COL also is a member of ACODE which does give access to good sources of comparative policy, process and data but attempts to have direct benchmarking relationships with other providers (most recently with UNE) have always had short-lived utility. The COL does get some benchmarking information from IHEA, APLEC and CLI, and ongoing accreditation by admitting agencies can be regarded as a form of qualitative benchmarking. TEQSA good practice guides are also useful sources of external referencing. For all that, the COL regards its approach to benchmarking as adequate and informative, but it could certainly be improved.

Curriculum Advisory Committees – ie, committees of external industry and academic experts, meet annually to consider the relevant curricula to ensure that they continue to teach the appropriate knowledge and skills at the appropriate standard. Recommendations from the CACs are filtered via the Academic Secretariat into the Teaching, Learning & Design Directorate.

External Moderation Reports (PLT) – are run in every subject in every state every year. Sampled assessments are chosen on the basis of their proximity to the various Grade frontiers (Pass/Fail; Distinction/Credit etc) and recordings of the samples are sent to the moderators (with rubrics) who fill out reports asking the extent to which they agree with the original Grades and a series of further questions regarding the curriculum and assessment instrument. Recommendations from the external moderators are filtered via the Academic Secretariat into the Teaching, Learning & Design Directorate. External Moderation Reports (Prac Ed) – are run in every subject every two years (on average).

Employer Satisfaction Reports – are informal but highly valuable information regarding the perceptions of the key end-users of COL graduates. The COL does not seek such information in any quantitative or systemic manner but does have regular discussions with co-operative firms and Supreme Court admission agencies regarding their satisfaction with the quality of COL graduates and curricula.

Course Review Panel Reports – (and to some extent, Course Approval Panel Reports) document a periodic deep dive into a course to consider whether it is achieving its aims and continues to deliver appropriate outcomes for students. Student outcome data is considered by Course Review Panels but also much information regarding course structure, learning outcomes and assessment to get industrial and external academic input into curriculum and its ongoing fitness for purpose. Such panels invariably make conditions, requisitions and suggestions for the ongoing accreditation of the course. Conditions are usually required to be satisfied within a short time frame and requisitions usually within 12 months. (See Course Review Policy.)

Scholarship and Planning

A key part of the COL's academic quality effort is the employment of scholarship and academic planning to inform replenishment of curricula and materials and how they are delivered and assessed.

There is some research undertaken at the College, mainly SOTL for the APLEC Conference and related internal uses, presentations at the International Bar Association (IBA), and the activities of the Centre for Legal Innovation. There are also occasional pieces of research done by individuals (such as the Resilience (wellbeing) project and the Successful Graduates project.

The College tends to be more active in scholarship – the advancement of knowledge – than the generation of new knowledge. Most of this work is co-ordinated within the Academic Secretariat and the Centre for Legal Innovation (CLI), with input from the Research & Scholarship Committee and the Academic Board. The fruits of scholarship and planning are then processed via the Teaching, Learning and Design Directorate to generate improved curricula and materials.

A description of how scholarship happens and is used to drive improvement at the COL is in the Research and Scholarship Schema.

Changes to curricula and materials are recorded in the Content Changes Approval Register.

Academic Risk

The key documents under academic risk are the annual TEQSA Risk Rating (in response to TCSI and PIR data) and the Academic Risk Register, maintained by the Academic Secretary and reported to both the Academic and Corporate Boards every year.

The TEQSA Risk Rating is an assessment of data as reported via the TCSI system and Provider Information Request (PIR), then compared with other providers to plot the COL on a bell curve which indicates the "likelihood" of a particular risk occurring. Where one falls on the curve determines whether that risk is regarded as High, Moderate, or Low. The COL traditionally has been regarded as Low for financial risks and Moderate for risk to students. This is largely due to a couple of High risk findings in criteria which do not fit well with the unique COL condition. (Mainly lecturer/student ratio and casualisation.) It is important to note that a finding of High or Moderate risk is not an adverse finding.

The Academic Risk Register identifies a number of academic risks and assesses on likelihood of occurrence and potential impact in the same way corporate risks are assessed.

As identified by the data collections listed above, main risk signals for the COL include the following:

Enrolments – numbers falling below expectation (in the absence of broader market indicators) can be evidence of falling quality and waning word-of-mouth influence. Falling enrolments are a risk to reputation and financial strength. TEQSA regards enrolments rising

(or falling) too quickly as a sustainability risk although the COL has always managed to scale up or down as required due to its large pool of available adjuncts (casual lecturers).

Completions (PLT) – if we saw completions trending lower than the (already high) rate we would need to investigate as such could potentially damage the College's "brand", impact future enrolments and jeopardise financial planning. The opposite risk is that the completion rate is high because the course is not taught or assessed at the appropriate level, which could have the same adverse impacts. Accordingly, external moderation of grades and the minutes of Course Review Committees are important cognate sources for triangulation purposes. Employer satisfaction is also important where available.

Attrition (Prac Ed) – attrition going over 30% would require investigation as to teaching quality and appropriateness of level. The opposite risk is that our artificially low official rate could lead to complacency regarding quality. Again, external moderation of grades and the minutes of Course Review Committees are important cognate sources for triangulation purposes. Employer satisfaction is also important where available.

Grade averages – while the COL does not mark in accordance with norm referencing, we do expect to see grade averages in the high Credit / low Distinction range (in both cohort averages for a single event and across the calendar year) and anything beyond that may be worthy of investigation. Grade averages in PLT (across years and states) are a valuable tool for internal moderation and have inspired, from time to time, cross-marking exercises to determine whether markers in a particular state are too soft or too hard on their cohort. Grade averages can be distorted in Prac Ed cohorts with low numbers.

Student Satisfaction – we normally expect to see most measures above the target benchmark of 4.0 on a five point Likert scale. Any score falling (more than marginally) below 4.0 is worthy of investigation. Qualitative data can be revealing here. Students dissatisfied with their COL experience are potentially a significant risk to brand and financial planning.

QILT – the apparent disconnect between the College's end of course satisfaction surveys and the QILT Graduate Outcome Survey (GOS) carries the risk that the College's survey is giving us false confidence in the quality of our Programs. There are a number of complex issues here which warrant our close attention and action.

Student Confidence (PLT) – aligned with Student Satisfaction, Student Confidence is an indication of fitness for purpose of the PLT Program. Falling confidence would be suggestive of a failure of fitness for purpose (ie, teaching at the wrong level).

Employer Satisfaction – employers not satisfied with the quality of COL graduates would be a very significant risk to the COL as employers often choose their graduate lawyers' place of PLT or even Masters degree education. We have never tried any systematic quantitative survey of employers but there are other qualitative means of establishing satisfaction. The COL dominates the co-operative course landscape in Australia and conducts regular feedback interviews with the various co-operative partners. Ongoing course accreditation by the various admitting agencies can also be viewed as a form of employer satisfaction.

Benchmarking – despite the difficulty of arranging strong and useful benchmarking relationships, the COL does manage to get some benchmarking information as described above. Failure to get adequate benchmarking information would risk the COL remaining

uninformed about developments in good practice with concomitant risk to reputation and fitness for purpose.

Closing the Loop

Closing the loop involves looking at what can be learned from any data set or other information and using that to inform improvement in both courses and their delivery. It also involves subsequent analysis as to the impact and efficacy of those improvements.

Some forms of closing the loop are straightforward (eg, implementing the recommendations of Course Review Panels, Curriculum Advisory Panels or external moderation reports). We should always aim to be organised, disciplined and timely in this regard. We should also aim to inform the various panels or moderators as to how their recommendations were used (or not used).

Other forms of closing the loop are more nuanced as they may not be directly apparent from the data. Analysis of Grade Averages or Student Satisfaction, for example, can lead to any number of matters for improvement in both curriculum and delivery or assessment. We should aim to report on how such analyses have been conducted and how the data identified an issue worthy of resolution.

A straightforward example is where the data shows Grade Averages in a particular state (or cohort) significantly higher or lower than other states. This might inspire a review of grades or cross-marking exercise to ascertain whether the apparent anomaly is real. If it is, remedial actions might include counselling/retraining of assessors; revision of learning materials; revision of assessment instruments; revision of teaching methodology. Once these measures/improvements have been implemented, subsequent data ought to reveal whether they have been successful.

In particular, we should be planning for particular improvements whether as a result of scholarship, data or other analysis, and reporting on the success or otherwise of the plan. The work of the Academic Secretariat is substantially about leading the analysis and planning of academic projects to improve curricula. Scholarship, the work of CLI and TLD are all key to this.

An annual "closing the loop" report (cognate with the Academic Baseline Report for the previous calendar year) has been added to the Academic Board's agenda, commencing in 2025.

Quality Assurance Framework

Similar to the Academic Baseline Report where data sets and information can be triangulated to demonstrate academic quality as represented by grades, the same data and other information / activity can be used to represent academic quality via improvements identified in the "closing the loop" report.

The diagram below shows how data collection and use; academic planning and scholarship resulting in development and replenishment projects, and comparison and feedback helping to identify and mitigate academic risk are indicative of academic quality once the results

have been analysed and shown to be effective. The collection and use of data; planning and scholarship; and comparison and feedback activity are only valid once the loop has been closed.

Data refers to the various data sets routinely collected and used by the COL.

Comparison and Feedback refers to the COL's various benchmarking, moderation and surveying activities used to identify opportunities and risks.

Planning and Scholarship are inspired by data, comparison and feedback, with a view to identifying specific projects for improvement of curricula and delivery.

The three sides of the triangle can also be conceived as continuous improvement loops (eg, collection of data; use of data; closing the loop). The reason they are portrayed as a single triangular diagram represents the way the three approaches to continuous improvement are interrelated and interreact.

By taking all data use, risk mitigation and development projects to their desired conclusions and demonstrating how they have been effective (or not) we are closing the loop and proving to ourselves, and to other stakeholders, the academic quality condition of the COL.
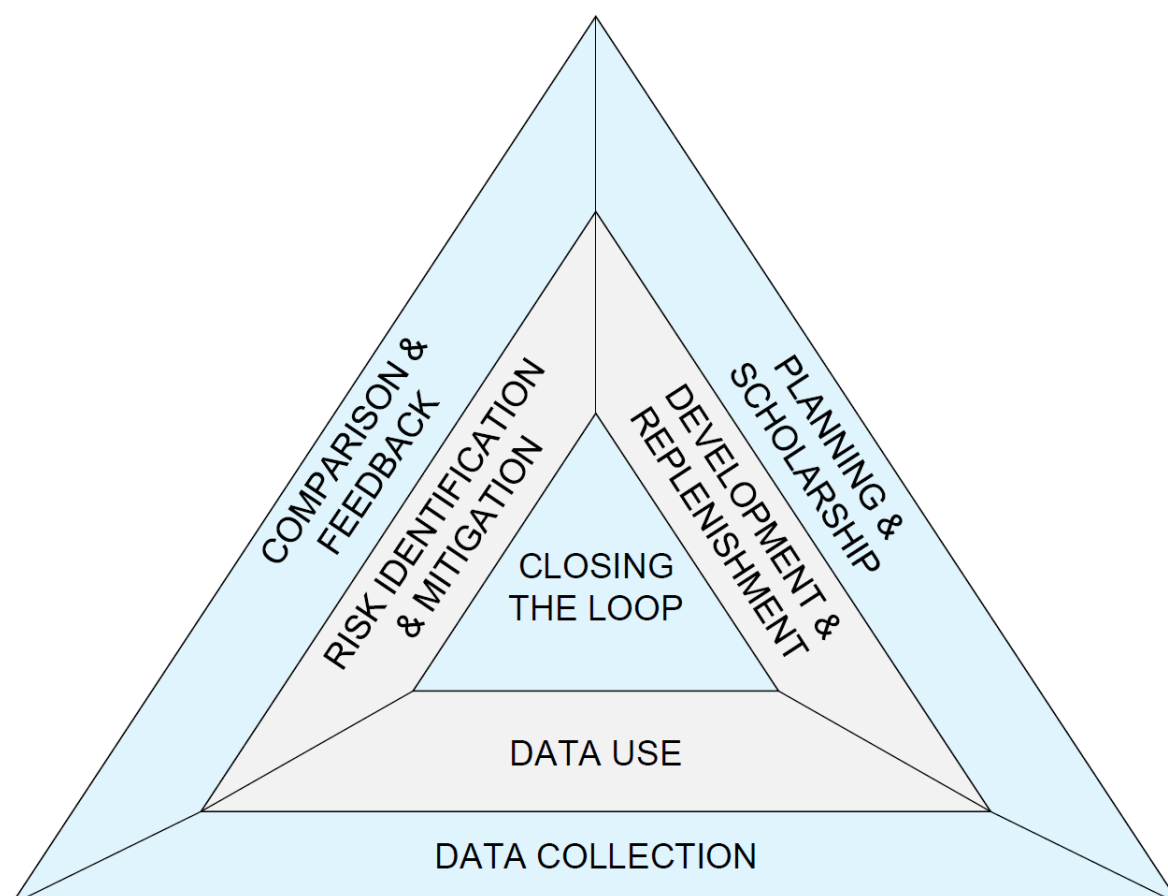
	Collection of Data	Use of Data	Scholarship & Planning	Academic Risk	Documented Improvement/ Closing the Loop
Enrolment data					
Completions (PLT)					
Attrition (Prac Ed)					
Grade averages					
Student Satisfaction					
QILT					
Student Confidence (PLT)					
Benchmarking reports					
Curriculum Advisory Committee minutes					
External Moderation reports Employer Satisfaction reports					
Course Review Panel reports					

[Need to think about how the table would be used. Do we want notes in each field or just something like a traffic light system (at least in closing the loop)? Do we want something else entirely, like a concentric diagram?]