

**The Identification and role of the Management of Risk in  
the Course Accreditation Procedures of Australian  
Universities**

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A thesis submitted in partial fulfilment of the requirements for a

**Doctor of Philosophy**

**University of Technology Sydney**

## Statement of Originality

I, Richard Maxwell Audley, declare that this thesis is submitted in fulfilment of the requirements for the award of Doctor of Philosophy in the School of Business at the University of Technology, Sydney.

The thesis is wholly my own work unless otherwise referenced or acknowledged. I certify that all information sources and literature used are indicated in the thesis.

This document has not been submitted for qualifications at any other academic institution.

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Dick Audley

## Abstract

Australian universities have the right to accredit the programs of study leading to their awards. Each institution has developed its own procedures for assessing the rigour, relevance and viability of course and subject proposals. A common factor across the sector is the identification and management of risk. The research focuses on how risk has had an impact upon the course approval procedures of Australian universities.

The research was conducted in two parts. The first consisted of an analysis of the material provided by Australian universities explaining their course accreditation and risk management procedures. This analysis disclosed a series of gaps, which were filled in the second stage by the interview of relevant staff. Both sets of information were then used to establish a relationship between risk management and course accreditation procedures in Australian higher education.

It was found that there are two categories of risk in Australian universities – internal and external. The first is countered by prudent management and the second through contingency plans. It was also found that as the majority of those involved with the approval of courses have little training in risk management, risk is controlled by universities through a diligent adherence to procedures.

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## Glossary

This is a long glossary as many of the terms used in the thesis are specific to the sector and may have a different meaning from their wider use in the community.

For compatibility and convenience these terms follow as closely as possible the definitions used by the [Australian] Tertiary Quality and Standards Agency (TEQSA). TEQSA provides glossaries in three major locations - The TEQSA *Glossary of Terms* [<https://www.teqsa.gov.au/glossary-terms>] (*Definitions from this source are indicated by the word Gloss in the entries that follow*), the TEQSA *Glossary of Terms as Part A of the Higher Education Standards Framework 2015* [<https://www.teqsa.gov.au/glossary-terms-part-higher-education-standards-framework-2015>] (*Indicated in the entries below by the abbreviation Part A*) and the *HEIMSHelp Glossary*, a document meant more for technical and reporting purposes rather than risk management or course accreditation. [<https://heimshelp.education.gov.au/resources/glossary>]. [*Indicated by the term HEIMSHelp after the definition*] As might be expected these glossaries are complementary and there is no conflict between them. At the same time many the definitions from these sources are legalistic in tone and verbose, and for this reason most have been shortened or abbreviated to save space.

Where a definition is taken from another work the source is acknowledged. If the definition has been supplied by the researcher (usually as a synthesis from composite sources) the word (*Res - short for researcher*) has been used.

A number of entries relate to jargon. While the meaning of these terms is common knowledge within the sector (or parts of the sector) the expression may otherwise be meaningless to those outside. This is particularly the case with quotes from informants, and hence their inclusion here

It should also be noted that a number of terms have a tighter or more constrained meaning in particular universities. To avoid extending the Glossary to excessive lengths these institutional variations have been ignored except where a precise definition was deemed essential.

A

**Above Load Allowance** – The enrolment of more students into a program than have been funded or approved by the Commonwealth, with an assumption that some will withdraw before the **census date** (similar to an airline overbooking flights). If the allowance is correct the university will not lose financially. If these assumptions are incorrect the university will have to carry the additional cost, and hence this becomes an important consideration in course proposals. [See also **Turnstile Numbers** and **Effective Enrolments**]

**Academic Board** – The group appointed by the governing body to oversight the academic activities of a university. [The name may vary according to the institution, and while teaching is always the responsibility of this body its coverage may or may not include research] (Res)

**Academic Governance** - A subset of the overall governance of a higher education provider. Academic governance deals with the framework that regulates providers' academic decisions and quality assurance. This includes the policies, processes, definitions of roles, relationships, systems, strategies and resources that ensure academic standards and continuous improvement in academic activities (Gloss)

**Academic Standards** - An agreed specification (such as a defined benchmark or indicator) that is used as a definition of a level of performance or achievement, rule or guideline. Standards may apply to academic outcomes, such as student or graduate achievement of core discipline knowledge or core discipline skills (known as learning outcomes), or to academic processes such as student selection, teaching, research supervision, and assessment (Gloss) {See also TEQSA Standards}

**Accelerated Mode** – A form of program delivery that enables students to complete a program in less than the standard time (Univ of South Australia) Normally approval to offer courses in accelerated mode forms part of the course accreditation process (Res)

**Accreditation (of a course of study)** - A formal process through which a course of study is authorised to be offered by a higher education provider. For providers that are authorised to self-accredit courses of study, the accreditation is granted through a formal internal governance process; otherwise the accreditation must be obtained from TEQSA. A course of study that is self-accredited or accredited by TEQSA may also be ‘accredited’ by a professional body for different and separate purposes. (See Professional Accreditation) At the same time, accreditation of a course of study by a professional body does not of itself entitle a provider to offer the course of study (Part A) [Do not confuse with Approval of a course of study – see next entry – which is the outcome from this process]

**Adjustment Factors** – Originally (and in normal usage) additional points used to raise a student’s admission rank. Now used by extension to indicate any variation applied as a matter of routine to course accreditation or risk management to allow for uncertainties or oversights (i.e., “We normally assume a 15% adjustment factor to cover withdrawals from courses”)

**Approval (of a course of study)** - A formal internal governance process to confirm that a course of study is suitable for offer by a higher education provider. Unless a provider has authority to self-accredit its courses, course approval must be followed subsequently by accreditation from TEQSA. (Part A) [In self-accrediting universities a course – at least in theory – is “approved” by Academic Board and “accredited” by the Governing Council. In reality both occur at the same time (Res)]

**Approved Partner** – An organisation with whom a university has a contractual relationship (either formal or informal) for the delivery of services to students (Gloss). [An example would be relations with Apple for the supply of discounted computers]. Approval is given by the university. (The approval of TEQSA is only required if the provider is a non-self-accrediting institution). The use of approved partners normally forms part of the course accreditation procedure.

**Articulation** - An agreement between providers to create a defined pathway that enables a student to progress from a completed course of study to another course of study with automatic admission rights or credit (Gloss)

**Assessment** - A process to determine value or fitness for purpose, such as course assessment or student assessment (Res)

**Attrition** - Withdrawal from courses before completion. The historic attrition rate is one of the factors considered in course accreditation and may be closely monitored by TEQSA (Res)

**Australian Higher Education Graduation Statement** - A supplementary statement to a testamur that provides additional information to enhance understanding of the qualification. (Gloss) Approval of this statement normally forms part of the accreditation process (Res)

**AQF - Australian Qualifications Framework** - Australia’s national policy for regulated qualifications (Gloss)

**Auditor** – A person auditing a subject, see next entry (Do not confuse with a financial or regulatory auditor)

**Auditing a subject (Sometimes called “Monitoring a subject”)** – Attending classes but not participating in the assessment or receiving credit for the outcome. (Universities that allow auditing normally charge a fee for this service and may or may not maintain records of attendance or enrolment. The number of students auditing subjects may have serious implications for space and equipment, and hence is considered as part of the course accreditation process)

Australian Universities Quality Agency (AUQA) – Quality agency superseded by TEQSA (Gloss) although still found in some course accreditation procedural documentation (Res)

## B

**Benchmarking** - A means by which an entity can:

- demonstrate accountability to stakeholders
- improve networking and collaborative relationships
- generate management information
- develop an increased understanding of practice, process or performance
- garner insights into how improvements might be made. (Gloss)

See also *External Benchmarking & Internal Benchmarking*

**Best Practice** – The practice accepted at a particular point in time as the best way to achieve a specific outcome (Res)

**Branch Campus** – A campus physically remote from the main campus of a university which is generally unable to provide the full services that the university itself may offer (particularly administrative services). The degree autonomy permitted to branch campuses differs from one university to another. (See also **Local Staff, Teaching Centre**)

**Bridging Course** (*Sometimes known as a Preparation Course*) – A non-award program intended to bring students to the point where they can commence a formal award. (Bridging courses are essentially voluntary in nature and should not be confused with Enabling Courses which are compulsory – See Enabling Course) [Most universities have a separate and less rigorous process for the approval of bridging courses (Res)]

## C

**Campus** - The physical location where a course of study is delivered. The site may or may not be owned or managed by the provider enrolling the student or conducting the teaching. (Gloss). Some universities have different accreditation procedures for different campuses, particularly where local factors exist or where the site is under the control of third parties (Res) [See Dual Accreditation, Branch Campus]

**Census Date** – The date nominated by the Commonwealth at which enrolment numbers are finalised (Do not confuse with “**Return Date**” - the date by which these numbers must be sent to Canberra)

**Combination Course (Combination Delivery)** - A course taught to a combined group of undergraduates and postgraduates in the same class, the difference being a higher expectation when postgraduate students are assessed. The general rule when courses of this type are accredited is that the standard applicable must be for the higher level. Courses not approved for combination delivery should not be available to mixed classes. (Gloss) It is usual practice to approve these courses in the normal manner as part of a one stage process but to give each level a separate course number. Combination courses are discouraged by TEQSA (and by most universities) but may be offered under sufferance when numbers are insufficient to make separate classes viable (Res)

**Combined Award** - Two separate awards studied concurrently leading to a single testamur, usually integrated to the point where the core component of one forms the electives of the other, such as a Business/Law degree (Gloss) [These courses are sometime known incorrectly as Joint Awards – see **Joint Award** below - Joint Awards which are offered jointly by two separate providers, each of which accredits the award separately. Combined awards are accredited in a single process and are offered by a single provider]

**Committee of Management** – The body appointed to oversight a multi-purpose campus and to co-ordinate the activities of all providers on site, containing representatives from each, often under the

control of an independent chair (See **Multi-purpose Campus** and **Dual Campus**). In the case of a multi-purpose campus there is a sharing of rooms and facilities, and an indication (generally by sign-off) that these resources will be made available is usually required as part of the course approval process. On a dual campus there is no sharing of teaching facilities (although there may be a sharing of library resources, IT, canteen, parking, security, etc.) and as a general rule no separate input is required from the Committee of Management as part of the course accreditation process. [It is normal practice, however, to keep this body informed of anticipated developments to ensure that there is no interference with the work of others]

**Complementary Provider** – A body separate from the provider involved in the teaching, or other support to a course (Gloss). Complementary providers could include groups such as TAFE, industry trainers, hospitals providing clinical places, specialist language teachers, music instructors, and so on. These groups operate under the control and supervision of the provider and are not registered by TEQSA. Their use, however, must be foreshadowed in course proposal documentation, with the provider remaining responsible for their performance and any risks that may arise (Res) [See also **Independent Providers** below]

**Contract Awards** – Programs offered under contract to external sponsors (often an employer or a professional association). Entry to these courses is normally restricted to those nominated by the sponsor, who would normally determine – or at least strongly suggest – the curriculum, although all teaching is provided by the university. These courses can be AQF compliant (in which case a formal award, such as a Graduate Certificate, can be conferred) or may be non-compliant and regarded as non-award courses. In the case of the former the normal approval process is followed. If the latter formal approval may still be required (depending on the university and the sponsor) or a revised procedure can be used (Res)

**Course Accreditation Committee** – A sub-committee of Academic Board that assesses the academic merit of course proposals. Course Accreditation Committees, if satisfied, normally “recommend approval” to Academic Board as the final stage of the accreditation process (Res) [See also Accreditation above]

**Course completion** - The successful completion of all academic requirements for a course of study. (Gloss) The course completion rate is often used as a benchmark by regulators and universities in the cyclic review of courses (Res)

**Course Coordinator** – The staff member responsible for oversight of a course (Res)

**Contract Course** – A course offered under contract to an external party (Gloss). [See also **Non-Portfolio Course** and **Restricted Course**]

**Co-requisite** – Study required either before or simultaneously with enrolment in another subject. (Co-requisites have long been falling out of favour in Australian Higher Education. Where required, however they must normally be listed and justified in the course proposal documentation (See also **pre-requisite**))

**Course of study** - A coherent sequence of units of study leading to an award of a qualification(s). The use of ‘course of study’ in the Standards includes both coursework and higher degree by research programs unless otherwise specified. Courses of study are sometimes known as 'programs' (Part A). Courses of Study – and the subjects within them – are the normal units of analysis of course accreditation committees.

**CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students)** - A searchable database, run by the Australian Government, which lists all Australian education providers (and their courses) for those studying on student visas. (Gloss) One requirement of the accreditation process is assurance that what is proposed conforms to CRICOS requirements (Res)

Critical incident - A traumatic event, or the threat of such an event (within or outside of Australia), which causes extreme stress, fear or injury (Part A) [TEQSA requires notification of all critical incidents as part of the risk management process, including accidents, damage to property or threats to reputation, if these are non-trivial or likely to cause embarrassment to the sector Res]

## D

**Degree Mill** – A bogus (and unregistered) higher education institution offering awards for money. The operation of degree mills is illegal in Australia (Res)

**Deposited Copy** – The official documentation for a course filed in hard copy in an institution's archive, normally with original signatures, etc. If there is a dispute about what was originally approved (or what the university has promised to provide within a course) the authoritative source is the deposited copy

**DET (Department of Education and Training)** - The Australian Government department with responsibility for developing and administering higher education policy and programs and administering funding under the *Higher Education Support Act 2003*. (Gloss)

**Dual Accreditation** – A process that may occur where a university teaches on premises it does not control, such as a TAFE College. The course is accredited in the normal manner by the university and it then requires further approval by the owner of the site before it can be offered [This second approval normally relates to any inconvenience, interference or other problems likely to arise. It does not involve a reconfirmation of academic merit, etc (Gloss)]

**Dual awards** - Two or more awards studied concurrently (Such as a Bachelor of Science and a Bachelor of Education) that normally lead to separate graduation ceremonies and more than one *testamur*. (Failure to complete one award does not debar the student from conferral of the other). Each award is approved separately by the institution concerned (Gloss)

[**Dual awards** should be distinguished from **Joint Awards**, a term with two meanings. In the first instance it is an award offered jointly by two independent providers (see **Joint Providers** below) In the second case it is a combined award offered by one institution that requires only one approval (see **Combined Award** above) with students attending only one graduation and receiving only one *testamur* (Res)]

**Dual Campuses** – A campus on which two or more providers (generally VET and Higher Education) operate side by side but without a sharing of teaching facilities. [They may, however, share other resources to achieve economies of scale - See **Multi-purpose Campuses**]

**Dual Level University** – A university offering VET as well as Higher Education awards (Gloss) [VET courses often require a different approval procedure to their higher education counterparts, and thus there may be two separate accreditation processes in the same institution]

## E

**Effective Enrolments** – The number of students enrolled in a course on census day (See also Turnstile Number and Above Load Allowance] [The effective enrolment is often a key factor in determining the viability of a course or subject (Res)]

**Embedded Staff (Embedded administrators)** – Specialised staff – generally administrative personnel such as Faculty Managers or Faculty Accountants, but possibly clerical assistants as well – who are permanently located within a faculty or other unit (and hence answerable for the performance of their duties to the head of that unit) but who are part of a wider group within the university, with the manager of that wider group (such as the University Secretary) supervising the quality of their performance. Tension between these groups of managers may complicate the role of incumbents (See also **Faculty Staff**) (Res)

**Enabling course** - A mandatory program to prepare students for study at a higher level. (Do not confuse with Bridging Course. A bridging course does not lead to a formal award and is rarely compulsory. An enabling course may lead to a formal award, is more tightly structured and is normally compulsory for all who are unable to meet the criteria for study at the next level. A Masters Preparation program is an example of an enabling course, an English Language program of a Bridging Course. There may be a simplified accreditation procedure for bridging courses. Enabling courses must be accredited in the standard manner)

**ESOS (Education Services for Overseas Students)** - The legal framework that governs the delivery of education to overseas students studying in Australia on a student visa (Gloss) Unless overseas students are specifically excluded from a program (as in certain Nursing awards available to permanent residents only) all Australian university courses must be ESOS compliant – a point checked during the accreditation process (Res)

**ELICOS (English Language Intensive Courses for Overseas Students)** - Courses offered to students studying in Australia on student visas as preparation for tertiary study. The word ‘Intensive’ is a visa requirement that denotes a full-time study load (20 scheduled course contact hours per week). (Gloss) [As few ELICOS courses lead to an AQF recognized qualification the approval process need not follow standard institutional procedure and is often much abbreviated (Res)]

**English language proficiency** - The ability of students to use the English language to make and communicate meaning in spoken and written contexts while completing their course of study. A statement of the expected language proficiency is normally required in all course proposals (Gloss)

**Enterprise Risk Management** - A coordinated “system wide” approach to risk that seeks to combine risk identification and amelioration with effective communication to and from all parts of the organizational network (Gloss) [When TEQSA speaks about “Risk Management” it effectively means “Enterprise Risk Management” unless the context suggests otherwise (Res)]

**External Accreditation** – Additional accreditation by a non-government body, such as a professional group or a learned society such as the Institute of Engineers Australia (Gloss). While external accreditation is not a legal requirement, failure to achieve this recognition may impair the future employment of graduates. [Do not confuse with **Professional Registration** where requirements are more rigid (Res)]

**Extension Studies (Extension Subjects)** – Additional subjects taken over and above those required to satisfy requirements for completion of a course, but which do not lead to an additional qualification (Gloss). These are normally foreshadowed when proposal is submitted for approval as an extension of a course (Res)

**External Advisory Committee** – A body appointed by a university to provide advice on course content and employment requirements (Gloss) [The role is purely advisory, and it is not mandatory for a university to heed the advice offered – Res]

**External Benchmarking** - Benchmarking provided by someone other than the provider (Gloss)

## F

**Faculty Staff** – Staff employed locally by a faculty (or similar group) and paid from faculty funds (research assistants, clerical assistants, etc). The first loyalty of this group is often to the faculty as their immediate employer rather than the university as a whole. (See also Embedded Staff. Note that in some cases embedded staff can be paid from a central cost centre while in others they may be paid locally. Faculty staff are always paid from faculty funds) (See also Local Staff)

**Fence-Line Agreements** – A term with three meanings;

- An internal agreement preventing one group from intruding on the work of another, thus preventing duplication and disputes. {Thus, a Business faculty may have a fence-line agreement with its Science, Engineering and IT counterparts about the teaching of Computing). The need for prior fence-line agreements can sometimes be found in course accreditation procedures, where they are designed to prevent disputes as approval proceeds
- An agreement between VET and Higher Education providers to ensure the smooth progression of students from one sector to the other [i.e., VET will take them so far, after which Higher Education will take them further on their journey without the need for repetition or duplication of skills already learnt] These agreements are common in the “non-taught” component of courses [See **Non-Taught Subjects**]
- An agreement between two or more providers of a similar nature about the geographic areas on which they will concentrate in their advertising of courses and recruitment of students. (Usually found where university drawing areas overlap state boundaries) These agreements may be required as part of the course proposal documentation. [Note -These agreements do not prevent anyone from the other area applying to or being accepted by the other university. It is simply that the institutions concerned agree to give each other a fair go when competing for students]

**Field of education** - The classification system (split in to three levels) used by higher education providers to classify courses of study, specialisations and units of study. Field of education groupings of courses and specialisations are on the basis of similarity of potential professions, rather than similarity of content, while units of study are coded on the basis of a likeness in terms of their subject matter. (Gloss & HEIMSHelp). The field of study determines the HECS payable by students and as such is expected to form a mandatory component of course accreditation proposals (Res)

**Financial viability** – The financial resources and financial management capacity to sustain higher education provision consistent with the requirements of the Provider Registration Standards outlined in the *Higher Education Standards Framework (Threshold Standards) 2015* (Gloss). [Providers examine the financial viability of courses. TEQSA examines the financial viability of providers (Res)]

**Franchisee** – An approved provider that has rented the intellectual property and course material of another university to avoid the need to develop its own material (usually done in cases of urgency where time does not permit normal course development). If a course has been approved by the parent university (the franchiser) the approval process in the franchisee – if self-accrediting - may be much reduced or eliminated entirely, thus further saving time. (If the franchisee is non-self-accrediting the approval of an external panel is required in the normal manner). The franchisee may enrol students in its own name and is generally accorded more latitude in governance and control over the program than a **Teaching Agency** or **Teaching Partner**. Both the franchiser and franchisee remain legally and financially separate, with staff employed by the franchisee rather than the parent university (although the appointment of staff may occasionally require the franchiser’s approval to protect the reputation of the course itself). Franchising is essentially a way of saving time in getting courses to market by self-accrediting providers, or as a means to “test the waters” before a firm commitment is made (See also **Teaching Agency**)

G

**Governance** – Catchall term for the managerial control exercised over higher education institutions

**Governance of course approval** – The oversight of course approval within a university. While course approval is ultimately the responsibility of the Governing Body on the recommendation of Academic Board, the latter is normally assisted by groups such as the institutional executive, institutional leaders at various levels and specialised advisors

**Governing Body** – The body with ultimate decision making authority over a higher education provider and its operations (Gloss). Often called the “University Council” (Res)

**GAA (Government Accreditation Agency)** - State and territory government accrediting authorities (Such as the NSW Board of Higher Education) that were previously responsible for accrediting higher education qualifications and authorising non-self-accrediting higher education providers (Gloss). Many of these functions have now been subsumed by TEQSA, although the state may still need to provide approval in specific contexts, as required for example by the NSW Anatomy Act, hence the continued use of this acronym in procedural documentation (Res)

**Graduand** – A person eligible to graduate who has yet to pass through a graduation ceremony (Gloss). [The distinction between Graduand and Graduate is important for funding and hence is noted in university reporting and documentation]

**Graduate Attributes** - Generic learning outcomes that refer to transferable, non-discipline specific skills that a graduate may achieve through learning that have application in study, work and life contexts (Gloss). A statement of the anticipated graduate attributes is now mandatory in most course accreditation proposals (Res)

H

**Higher degree** (sometimes known in course procedures as a “later degree” or a “subsequent degree”) - An award at AQF Level 8 or above that normally requires possession of a Bachelor’s degree. (Note however that a Bachelor Honours Award is not classified as a higher degree) (Part A). Higher degrees may require a more intensive accreditation procedure than their undergraduate counterparts, depending on the university – Res). [*Distinguish between Higher Degree and Higher Education Award – see next entry*]

**Higher Education Award** - A qualification covered by level 5, 6, 7, 8, 9 or 10 of the Australian Qualifications Framework that falls within the jurisdiction of TEQSA (Gloss). Only registered providers can offer higher education awards (Res) [See also Complementary Providers above]

**Higher Education Provider (provider/HEP)** - Defined in the TEQSA Act as a constitutional corporation authorised to offer or confer a regulated higher education award (Gloss). [A provider is the body that *confers* an award. It need not be the one teaching or developing it, and the provider may or may not have self-accrediting status. There is in fact nothing to prevent anyone in Australia from offering a course at tertiary level, irrespective of their qualifications, provided there is no breach of copyright, no intent to deceive, and that the students are over 18 (thus avoiding child protection legislation). The offence lies in *conferring* a degree. Only a registered higher education provider can confer degrees (Res)] [See also Complementary Provider and Independent Provider]

**Higher Education Private Provider (HEPP)** – An entity other than a Public Provider authorised to confer Higher Education awards. (It should be noted that this category includes the so called “private universities”, such as Bond and the University of Notre Dame Australia as well as all non-government post-secondary providers) (See also **Public and Private Providers**)

**Higher Education Support Staff** - The generic name for all who work in or for a university but who do not participate in the actual teaching of students or the personal conduct of research (Gloss) [This includes some staff who might otherwise be regarded as academics, such as the Vice Chancellor as well as administrators, counsellors, professional staff, and so on (Res)]

**Higher Education Standards Panel (HESP)** - A legislative advisory body, established under the [Tertiary Education Quality and Standards Agency Act 2011](#) (TEQSA Act), with a responsibility for the establishment of standards (commonly known as the Higher Education Threshold Standards)

for the delivery of higher education in Australia (Gloss) (See also Higher Education Threshold Standards (HES Threshold Standards 2015 / HES Framework)

**Higher Education Sector** – A collective term, often used to embrace all Higher Education Providers, but used throughout this document as a means of referring refer to the university sector only (See also **Higher Education Provider**, and **University**)

**Higher Education Threshold Standards (HES Threshold Standards 2015 / HES Framework)** - Requirements set by the Minister for Education and Training on the advice of a panel with expertise in the delivery of higher education. The Higher Education Threshold Standards is the minimum level of achievement that a provider must meet and maintain to registered to deliver higher education courses of study (Gloss)

**HEIMS / HEIMSHHELP (Higher Education Information Management System)** – Information system developed by the Commonwealth Government used to convey higher education data and information to Canberra (Gloss). [HEIMSHHELP contains the glossary for this system]. While only referred to occasionally in the text of the thesis HEIMS – because it shapes the form in which data is required by the Commonwealth – increasingly (albeit indirectly) shapes the course accreditation and risk management procedures of Australian universities. [If information is not provided in this format it has to be converted before submission, and it is much easier and simpler if the system can be shaped to reflect the data required in this form from the beginning (Res)]

## I

**Incidental Fees** – Fees (which may be optional or compulsory) over and above the standard fee for a course, such as excursion fees, equipment fees, payment for expendables, and so on (Gloss). These fees are normally paid personally by the student and while collected by the university are not taken into account in assessing the financial viability of proposals as part of the accreditation process. [In certain cases, such as Executive MBA’s these fees can be quite substantial and represent a significant revenue flow (Res)]

**Independent Provider** – A provider that is not registered with TEQSA (such as a coaching college or private individual) that offers higher education subjects but is unable to confer awards (Gloss). Students enrol with these providers in a voluntary capacity for preparation, supplementation or convenience (many teach in native languages as well as English) and may subsequently use their results to apply for credit towards a formal degree. (The amount of credit – if any – is at the discretion of the recipient institution. Most universities set limits on the amount of credit that can be claimed from independent providers as well as nominating the independent providers they recognize). Independent Providers, unlike **Complementary Providers** are rarely mentioned in course documentation, are outside the control of TEQSA and are not considered as part of the accreditation process. [NOTE; The majority of independent providers offer bona fide services and those long established may have a reputation for quality, consistency and reliability. They should not be confused with degree mills – See **Degree Mill**]

**INQAAHE (International Network for Quality Assurance Agencies in Higher Education)** – The international network of Higher Education regulators. [TEQSA is an active member of this body and INQAAHE plays a major – although often unrealised – role in Australian Higher Education] (Res)

**Institutional Quality Assurance** - The fifth domain of the TEQSA **Higher Education Standards Framework** (see separate entry). TEQSA requires providers to ensure that “the mechanisms that are established by the higher education provider to assure itself of the quality of the higher education it provides (Institutional Quality Assurance), and to maintain effective governance of its operations (both Academic and Corporate Governance)” (TEQSA Contextual Overview of the HES Framework 2015)

**Internal Benchmarking** - Benchmarking conducted internally by a provider, often as a form of peer review (Gloss) Course accreditation is sometimes regarded as an extension of internal benchmarking (Res)

**International Student** – A person who is required to hold a student visa while studying in Australia (ESOS). *[This general yet quite specific definition is often overlooked by university staff. Not everyone whose permanent home is overseas is necessarily an international student, nor is every person resident in Australia a domestic student – the key test is whether they are required to hold a student visa during the period of study (Res)]*

J

**Joint Awards** - Courses offered through collaborative or cooperative arrangements between two or more higher education providers. (Gloss) Courses of this nature must normally pass through the accreditation procedures of both institutions. [Do not confuse with Combined Awards (Res)]

K

**Key Personnel** - A term used specifically by TEQSA to indicate the staff responsible for institutional outcomes and/or conformity with compliance requirements, who will be held at fault if failure occurs. This may include both executive and operational staff (Gloss)

L

**Local Staff** – Staff employed locally, often at a remote campus who are not expected to move elsewhere if operational requirements change. The first loyalty of local staff is often to the campus rather than the faculty or university

M

**Material Change** - Under section 29(1) of the *Tertiary Education Quality and Standards Agency Act 2011*, a registered higher education provider is required to notify TEQSA if any event occurs (or is likely to occur) that will significantly affect a providers ability to meet threshold standards or require the National Register to be updated. Material changes to an accredited course of study (by non-self-accrediting institutions) or to the operations of a higher education provider may cause TEQSA to take regulatory action (Gloss) [This includes changes to procedures as well as changes to key personal (Res)]

**Mode of Study** - The type of instruction available to students. Examples include face to face attendance, distance or independent learning, intensive delivery, blended learning, and so on (Gloss)

**Multi-purpose Campus** – A campus used for the teaching of post-secondary education at varying levels (such as VET and Higher Education) *with shared facilities common to all students*. There may be a single provider for all levels, but it is more common to find a university and a VET provider (or perhaps even a high school) sharing classrooms and amenities. Where there is more than one provider, the campus – but not the teaching itself – is overseen by a Committee of Management (See **Committee of Management**) [Important - Distinguish between **multi-purpose campuses** and **dual campuses**. On a multi-purpose campus, the teaching facilities are shared, and this in turn requires an integration of timetables, rooming, and so on, through the local Committee of Management, which may require a sign-off as part of the course approval process. Dual campuses exist where two or more providers operate side by side (such as VET and Higher Education) but where each has separate teaching space and associated facilities (labs, etc) with economy of scale being achieved through a shared administration, a shared library, shared cleaning, shared security, parking, and so on, with the role of a weakened Committee of Management - which has no input into the accreditation process -

being simply to ensure that neither group interferes with the other [See also **Committee of Management**]

N

**National Code** (The National Code of Practice for Providers of Education and Training to Overseas Students 2018) - Legislation providing nationally consistent standards for the conduct of registered providers and the registration of their courses (Gloss) [While notionally covering services to overseas students only, it is impossible for providers to distinguish between these students and their local counterparts, and for this reason the National Code has become the de facto standard for the sector – Res]

**National Protocols** (National Protocols got Higher Education Approval Processes) - Developed in 2000 and revised in 2007, these protocols were a key element of the national quality assurance framework for Australian higher education. Now obsolete but aspects of the National Protocols were incorporated into the *Higher Education Standards Framework (Threshold Standards) 2015*. (Gloss) [The reason for inclusion of this now obsolete term lies in the fact that there is frequent reference to the “National Protocols” (as an unremoved residual legacy) in the course accreditation procedural documents published by Australian universities and hence in the statements of informants – Res]

**National Register** (National Register of Higher Education Providers) - The authoritative source of information on the status of registered higher education providers in Australia. The National Register was established and maintained under section 198 of the *Tertiary Education Quality and Standards Agency Act 2011*. (Gloss)

**Nested courses/ Nested degrees** - Programs of study within a broader area that can lead to graduation with a lesser award. While many nested degrees are little more than early exit points (such as a Graduate Certificate offering an early exit from a Master’s program) nested degrees sharing subjects with longer programs can also be offered as stand-alone qualifications (Gloss). [The key point, however, is that a nested degree is accredited at the same time, using the same instruments and documents, as the primary award (Res)]

**Non-AQF award** [Sometimes known simply as “non-awards”] - A course leading to a qualification or award (such as a Certificate of Attainment) not covered by the Australian Qualifications Framework (AQF). Non-AQF qualifications or awards must not use AQF terminology (Gloss) [Accreditation procedures for non-AQF programs may follow a different pattern to their AQF compliant counterparts, depending on the university (Res)] (See also Contract Awards)

**Non-Portfolio Course** – A course that satisfies the requirements of the Australian Qualifications Framework and leads to a recognized award, but which is not available to the public as part of a university’s advertised portfolio of courses (Gloss). Many contract courses fall within this category (See also **Contract Course** and **Restricted Course**)

**Non-Taught Subjects (Sometimes called “Nominal Subjects”)** – Subjects that appear in a course sequence that are neither offered nor taught by the university. These subjects normally appear where all students are required pass through another provider (often VET) as part of their first year, as in certain Engineering degrees. This saves the university money, filters out the ill prepared, and may enable facilities such as workshops and laboratories to concentrate on the needs of more senior students. The subjects taught elsewhere are shown in the course documentation, and are given formal names and subject numbers, but have the added comment “Non-Taught” to show that they are not provided by the university. [Non-taught subjects are included within the student load for full time/part time purposes and hence must be shown on the student record system. They may also attract HECS. The point is that they will not be taught by the university]

P

**Pre-requisite** – Study required before a subject or course can be taken. Prerequisites are normally stated in course proposal documentation (See also **co-requisite**)

**Professional Body** – A group of specialists established for a particular purpose. There are two types of professional body;

Those with a responsibility for the registration of practitioners

Those with a responsibility for providing networking opportunities for practitioners

While both have a significant impact on the behavioural response of universities it is important to note that these bodies have no control over the institution although they may impose considerable influence on its activities.

**Professional Registration Authority** – A body responsible for the professional registration (and hence the right to practice) of graduates, such as the Nurses and Midwives Registration Board of Australia. (Gloss) These groups are completely separate from TEQSA although the requirements of these bodies are always taken into account as part of the course accreditation process

**Provider** – A body authorised to offer Higher Education awards in Australia (Gloss)

**Public and Private Providers** – A Public Provider is an institution that has originated from government initiative and is viewed as owned by the government. A Private Provider is a body originating from another source that operates at a greater length from the government according to the tenets of its proprietors. Despite this, both are governed by common sets of rules, oversights, and restrictions according to the level of teaching. It should be noted that not all public providers are self-accrediting, even though they may offer higher education awards (i.e., TAFE Colleges) and not all private providers have been denied self-accreditation (i.e., Bond University, The Australian Catholic University, and so on) (See also Independent Provider, Higher Education Private Provider (HEPP))

## Q

**Quality** - While the interpretation of this term varies from one institution to another, it has been taken throughout this document to mean “fitness for purpose, appropriate to the intent of the provider”

**Quality Manager** - The person appointed by a university to oversight the “fitness for purpose” of its outcomes and systems. The Quality Manager normally has greater responsible for course accreditation than the **Risk Manager** (see separate entry)

## R

**Recognition of Prior Learning** - RPL (Sometimes known as Credit for Prior Learning –CPL) - An assessment process that involves examining an individual’s past experience (including formal, informal and non-formal learning) to determine their exemption from the certain parts of a degree (Gloss)

**Regulatory Risk** - Actual or potential risk events (regarding a provider’s operations and performance) that indicate that the provider may not meet the *Higher Education Standards Framework (Threshold Standards) 2015* – either currently or in the future.(Gloss) [When TEQSA talks about Risk it is normally Regulatory Risk that it has in mind (Res)]

**Restricted Course** – A course to which entry is restricted. (There may be many grounds for this, such as a requirement for a particular skill (as in Music), prior study in a discipline, foreign language ability, Australian residency, and so on. The restrictions to be imposed are normally confirmed as part of the course accreditation process). [While most university courses are subject to certain limitations –

such as their non-availability to non-matriculants – these are generally taken for granted and not mentioned in the course documentation. In the case of Restricted Courses, however, there are additional restrictions mentioned in the documentation that apply specifically to the program involved] (Res)

**Return Date** – The date by which enrolment figures (and other data on courses) must be returned to Canberra. Failure to meet this date may lead to delays in funding (Res)

**Risk Appetite** - The willingness of an organization to take or accept known or potential risks (Res)

**Risk Assessment** - The overall process of risk identification, risk analysis and risk evaluation (Gloss) [In certain universities the term has a wider meaning and includes a willingness to identify and accept the potential consequences – (Res)]

Risk Assessment Framework - The regulatory risk management policy and processes of TEQSA as required under the *Tertiary Education Quality and Standards Agency Act 2011* (Gloss)

**Risk Management Best Practices** - Procedures believed by peers to be the most effective for the assessment and management of risk (TEQSA Risk Assessment Framework 2018)

**Risk Management Committee** - A subcommittee of a provider's governing body responsible for the oversight of risk throughout the organisation (Gloss) [This committee may be known by a variety of names, such as Audit and Risk Committee, Risk Advisory Committee, and so on, depending on the institution. It is a TEQSA requirement that such a committee should exist and be operational (Res)]

**Risk Management Culture** - The approach to risk developed by an institution through experience over time and applied to its daily work (TEQSA Risk Assessment Framework 2018) [Risk Management Culture is one of the criteria used by TEQSA in assessing higher education providers (Res)]

**Risk Management Plan** - Strategy to avoid, mitigate or reduce the consequences of risk in higher education (Gloss) [TEQSA requires all providers to maintain and implement a risk management plan (Res)]

**Risk Manager** - The person appointed to oversight the management of risk in a university. Unlike **quality managers** (see separate entry) few risk managers have direct contact with (or responsibility for) the course accreditation process (Res)

**Risk Response** - The response made by a higher education provider to known or potential risk (Gloss) [TEQSA expects risk response to form part of each provider's risk management plan (Res)]

S

**Sandwich Course** – A course taught partly in the university and partly (by release) in the workplace. The university may or may not supervise the work done off campus (See **Wilson Model**). The accreditation of a sandwich course may involve an accreditation of the workplace (and/or the industry partner) as well as approval of the program itself.

**Sector** – the generalised name for all bodies included in a group. In the case of this document the word relates to self-accrediting Higher Education providers only

**Site Map** – Common abbreviation for the TEQSA Site Map (See **TEQSA Site Map**)

**Subject (Called “unit” in some universities)** - The discrete components used to construct a course of study (Gloss)

T

**Teaching Agent (Teaching Agency, Teaching Partner)** – A person or organization authorised to teach on behalf of a university. A teaching agency has little autonomy and normally plays no part on the design or approval of courses, or the assessment of students as these tasks remain the responsibility of the university. A teaching agent is unable to advertise itself as though it was the university, cannot enrol students in these programs at its own volition, and cannot confer awards). Normally a teaching agent has no power to amend courses – an exception arises with certain specialised programs, such as Theology, Tourism or Hospitality where the university may accredit these changes, or even approve courses developed by agents on their behalf. Many teaching agencies also offer VET awards in their own name in complete independence from the university. A number of interstate and regional universities provide services to students (particularly international students) in the capital cities through teaching agents. (Distinguish clearly between a **Teaching Agent** and a **Franchisee** – the accreditation arrangements of each are quite separate)

**Teaching agreement** – An internal arrangement within a university allowing a particular group to teach subjects that others might consider their area of responsibility. (Thus, the Maths Department of a university may agree to allow Education staff to teach Maths to primary teachers, not because these staff are more learned than their professional mathematical colleagues but simply because they have a greater awareness of what their students require). These arrangements may be oral, or where groups feel threatened may form part of the course proposal documentation

**Teaching Centre** – A facility remote from the heart of the institution that the university uses for teaching purposes only. (Teaching centres may have minimal administrative support and may have so called “fly in-fly out” staffing. Premises may be rented or form part of another educational establishment, such as a TAFE College. Staff are employed by the university, however, and students are regarded as part of the university’s complement rather than the complement of the owner of the premises. Do not confuse with **teaching agent**)

**Teaching Restraint** – An internal agreement within a university restricting the type of student who is entitled to take a particular subject (often because it will be taught at a lesser level than required for a formal award in that discipline). Teaching restraints – sometimes known as “student restraints” - are permanent and are usually incorporated into course documentation. [Do not confuse with **pre-requisites** and **co-requisites**)

**TEQSA** - Common acronym for the (Australian) Tertiary Education Quality and Standards Agency

**TEQSA Higher Education Standards Framework** - Standards developed by TEQSA for the higher education sector. These standards are in two parts – Part A, Standards for Higher Education (the minimum acceptable requirement for the delivery of higher education) and Part B, Criteria for Higher Education Providers (the minimum acceptable standards for registration as a higher education provider). The standards (sometimes called the “threshold standards” – see separate entry – are further divided into domains and sub-domains (sectors). (TEQSA HES Framework 2015). Both are highly relevant for risk management in course accreditation (Res)

**TEQSA 5.1 (TEQSA Standard 5.1)** - Higher education jargon for the TEQSA regulation governing higher education course accreditation in both self-accrediting and non-self-accrediting providers, a term frequently used without further explanation by informants, sometimes simply as 5.1. (i.e., “We are fully 5.1 compliant”)

TEQSA states

“5.1 Course Approval and Accreditation

TEQSA’s main focus will be on ensuring that the provider has an effective internal process for approval of all courses, which includes rigorous academic scrutiny through the institutional academic governance processes of the provider, independently of those involved directly in delivery of the course of study. All providers are expected to have such an approval process, whether they have self-accrediting authority or their courses are accredited by TEQSA” [TEQSA HESF Doman 5 2015]

**TEQSA 5.3 (TEQSA Standard 5.3)** - Higher education jargon for the TEQSA regulation regarding the monitoring, review and improvement of courses after approval that has since been incorporated into the course accreditation procedures of virtually all Australian universities. (Often referred to simply as 5.3 without further explanation – i.e., “We are tightening up our 5.3 procedures”)

TEQSA states

#### 5.3 Monitoring, Review and Improvement

This Section requires a provider to conduct periodic, comprehensive reviews of all courses (at least every seven years with evidence to be provided as part of the renewal of registration application to TEQSA), backed by more frequent monitoring of the day-to-day delivery of courses of study, for example, periodic reviews of units and annual review of student performance. We will expect to see that such reviews are conducted (or will be conducted in the case of a new provider or course of study) according to the requirements of the Standards as part of the provider’s normal operations, and that the findings of the reviews are evidently used to generate improvements. In demonstrating that it meets this Standard, a provider will need to demonstrate in particular that reviews of courses of study involve considered oversight by the institutional academic governance processes, external referencing (which can include moderation of assessment against other programs, benchmarking of student success and course design against programs at other providers) and feedback from students.

**TEQSA Regulatory Principles** - Statement of policy by TEQSA giving the three basic principles for regulation of the Australian Higher Education Sector;

The principle of regulatory necessity

The principle of reflecting risk

The principle of proportionate regulation (TEQSA HES Framework 2015).

These principles have subsequently been incorporated into the Risk Management (and other) policies of most Australian universities

**TEQSA Site Map (Jargon – “site map”)** - Located at <https://www.teqsa.gov.au/sitemap>. The normal starting point for information on TEQSA standards and procedures, as this page gives links to all TEQSA policies and documents. The term is more frequently used where something is not mentioned by TEQSA, and hence is left to the discretion of the university (i.e., “It’s not on the site map, but...”)

**Threshold Standards (Risk Standards)** - The minimum that can be accepted by TEQSA as defined in the Higher Education Standards Framework 2015.

“The Standards encompass the matters that a higher education provider would ordinarily be expected to address in the course of directing and monitoring its higher education activities and managing any associated risks. Each Standards statement addresses an underlying area of risk(s) to be managed.

This may be a risk to the sustainability and viability of the provider, to the quality of education provided, to the experiences of students in relation to a higher education provider, to the quality of learning outcomes on graduation, to the reputation of higher education in Australia or a combination of these.” (Higher Education Standards Framework 2015)

Both TEQSA and the universities stress that the threshold standards are the *minimum* that can be accepted, not the level desirable. Failure to achieve the threshold standards may lead to deregistration (Res)

**Turnstile Numbers (Turnstile Figures)** – The number of students enrolled in a course or subject on the first day of its commencement. [This number is usually diminished through attrition between the start of the semester and census day as students withdraw. The risk in course accreditation being that the difference between turnstile numbers (the number who commence) and census numbers (the number reported on census day on which the university is paid) may make the program unviable (Res)]

## U

**University** – An Australian self-accrediting higher education provider established by Act of Parliament (Gloss) [The use of the word is protected by Commonwealth legislation to prevent

deception (Res)] As there is considerable variation in the legislation establishing universities in Australia further generalisation as to their purpose, structure or mode of operation is impractical

**Universities of Specialisation** – Australian universities on which restrictions have been placed regarding the disciplines they offer. (At the time of writing the only example is the Australian University of Divinity, although others, such as the Australian Maritime College, have been suggested for inclusion if this body's links with the University of Tasmania are loosened)

**Unrestricted university** – An Australian university on which no restriction (apart from funding) has been placed on the disciplines that can be offered, used to distinguish these providers from

**Universities of Specialisation** on which these restrictions have been applied, such as the Australian University of Divinity. All of the universities discussed in this document are unrestricted universities. (See also **University**)

## V

**VET (Vocational Education and Training)** – Awards at AQF level 5 or below (Gloss) [There is slight overlap between VET and Higher Education awards at Level 6 (Advanced Diploma/Associate Degree) although this will be ignored in the thesis]

**VET Provider** – An organization or individual authorised to offer educational training awards at AFQ Level 5 or below (See also **Dual-Sector University**)

**Voluntary Study** – Additional work undertaken by a student in a voluntary (i.e., non-mandatory) capacity that is approved and recognized by a university towards the completion of a degree (Gloss). A “study abroad” program is an example of voluntary study – the student does not have to do it to gain the award, but if done the completion of this task will be recognized by the university). Voluntary study may not attract fees or funding but its availability (and the way in which it will be monitored) must normally be indicated in course accreditation documentation. [Distinguish between

### **Voluntary Study and Volunteer Subject]**

**Volunteer Subject** – A term originating in the US, meaning “an elective” [The term is rare in normal conversation in Australia other than in discussions of student record software. A mandatory subject – using the same terminology – is normally referred to in software documentation as a “**core subject**”) [i.e., “*There are eight core subjects in this Master’s degree and four volunteer subjects*”. This means that students have a choice of subject, not that they can opt out and do less if they so desire]. The term is not recognized by TEQSA and to avoid confusion its general use is discouraged

## W

**Wilson Model** - A system of business – university collaboration, named after Professor Tim Wilson’s 2012 report to the UK Government. Under the Wilson Model universities take responsibility only for those things they provide, leaving the rest to the industry partner. (While this is particularly true for accidents or incidents such as discrimination, it also applies to the quality of teaching and the scope of instruction) Under this model a university cannot be blamed for the unsatisfactory performance of its industry partner. The Wilson model – a system to free the university from liability – is frequently mentioned in the accreditation documentation of **sandwich courses**.

**Workplace Learning** – Knowledge gained in the workplace, usually while in paid employment. The instruction may be formal (as a result of a training program) or informal (knowledge picked up independently on the job). It is important to note that workplace learning is not under the control or supervision of a university, and because of its variability may or may not be recognized for credit towards a degree. [Distinguish between **Workplace Learning** and **Work Placement** – the latter

being under the control of the university and forming a normal part of course accreditation documentation]

**Work Placement** – The placement of students in the workplace for a set period as part of their formal studies. Under normal circumstances students are not paid by the placement provider, nor are they regarded as “staff” for the purposes of insurance, risk management of the disciplinary procedures of the placement provider. [This distinguishes those undergoing this form of instruction from those undertaking **Sandwich Courses**, who while not necessarily paid by the industry partner are still subject to the normal rules and discipline of the workplace] Work Placement may sometimes be known by more specific titles, such as Clinical Placement, Teaching Practicum, or Work Internment. Any requirement for work placement, including the relationship to be created between the university and the placement provider, would normally form part of the course accreditation documentation. [See also **Wilson Model**]

## Y

**Year-** Unlike terms specifying block periods (semester, term, and so on) the word “year” has multiple meanings in Australian universities, and what is intended can only be understood from the context.

The most frequent of these meanings are;

A Calendar Year from January to December (i.e.; “This is the year 2018”)

Twelve months from a particular event (i.e.; This course should be reviewed in a year’s time”)

A progression stage in an award (i.e.; “He is a second year student” – *which need not mean that he is in the second year of attendance at the university - he may well be enrolled part time, have taken leave at some stage, have received accelerated progression through advanced standing, and so on*)

An indicator of rigour and expectation. (i.e.; “Advanced Calculus can be taken at any stage but because of its difficulty is regarded as a third year subject”)

A cohort of students (i.e.; “Most of the year did well, but there were a few notable failures)

There are other potential meanings. For this reason, the word, Year has been used sparingly in the thesis, and where possible (other than in quotes from informants) alternative descriptors have been used.

# Chapter 1 Introduction and Overview

## 1.1 Background

Universities – unlike the majority of post-secondary educators in Australia – have a right through their enabling legislation to self-accredit the programs of study leading to their awards without external reference, a freedom that may set them apart their counterparts both at home and abroad. At the same time no standard method has been prescribed for examining course proposals, and as a result each institution has been free to develop its own methods for assessing the rigour, relevance and viability of future programs, a situation that has led to wide divergence in practice and procedure across the sector.

Despite this, there are a number of factors that are common to the assessment procedures of all Australian universities, one of which is the identification of *risk* during the approval process, a matter insisted upon increasingly by regulatory bodies such as the (Australian) Tertiary Education Quality and Standards Agency (TEQSA). The document that follows examines the way in which the need to identify and ameliorate risk has had an impact on the course accreditation procedures of Australian universities. (The study specifically excludes all non-self-accrediting institutions, whether government owned or privately managed.)

### 1.1.1 The scope of the research

The research has been limited to the 40 *unrestricted* Universities (Appendix C) that make up the bulk of tertiary providers in Australia. [An *unrestricted* university is an institution on which no restriction - other than funding - is imposed on the disciplines or awards it can offer]. This category of university should be distinguished from the single *University of Specialisation* and two *Licensed Overseas Universities* approved to operate in Australia all of which have less flexibility. There are eleven other institutions, some quite small, that have the right of self-accreditation but are not permitted to call themselves *universities* (National Register of Higher Education Providers 2017) and these have also been excluded from the study.

Course Accreditation and Risk Management procedures are subject to constant change in Australian universities, and it was necessary to set a common end point for the collection of material to ensure compatibility from one institution to another. The date selected was 1<sup>st</sup> January 2017, a point in time set by TEQSA for a greater standardisation of course accreditation procedural documentation across the sector, and hence a common reference point (Appendix A). While it is known that a number of universities have since made further refinement to their procedures (the information previously collected continued to be upgraded throughout 2018) it was felt that mention of these subsequent changes – which have not occurred in all institutions – would be likely to cause confusion and hence were disregarded.

The study is confined solely to the accreditation practices that exist when courses are to be offered in a traditional manner (essentially face to face, although possibly with technological assistance, as in blended learning or distance education) and ignores cases where programs are to be offered off shore (and may therefore need to meet the additional requirements of overseas regulatory authorities), or where the mode of delivery varies significantly from the norm, as in workplace learning, teaching through partners, or teaching under licence or franchise. All of the latter normally require some addition to the standard procedures of the university involved and these may be specific to the provider. For the same reason no attempt is made to examine the accreditation of research degrees, non-award programs or the VET courses offered by dual-level universities.

### 1.1.2 The need to consider risk

Australian universities have long been expected to be prudent in their operation, and to exercise caution where doubt exists (Lacy, Croucher, Brett & Mueller 2017). This pressure to be careful, and to consider all potential outcomes – both short and long term – has been further reinforced by political and community leaders and more recently by the Tertiary Education Quality and Standards Agency (TEQSA 2015). This is largely because universities are seen as both a community good, provided (or at least authorised) by the government, and as an investment in the country's future that may fail to deliver a satisfactory return if carelessness or malpractice prevails (Rochford 2001). This commitment goes well beyond the *duty of care* that exists in all relationships between teachers and learners. In essence it involves a sense of *accountable stewardship* for the trust placed in Higher Education by taxpayers, society, and the community in general (Leveille 2006).

This responsibility has long been accepted by Australian universities (ICAC 2015), who have traditionally been loath to accept foreseeable risks, both for the welfare of those entrusted to their care and their own protection from legal liability (Leiss 2004). These two pressures – the first, internal from institutional stakeholders and the second, external from governments and the community – have combined to make Australian universities conscious of risk and more than aware of its effect on their daily operations (Marshman 2011).

### 1.1.3 Risk management as a unifying factor in university operations

The fact that universities are forced to consider risk in all aspects of their activity has imposed a sense of unity on the otherwise diverse nature of the academy (Barblan 2016). Thus, scientists may face different challenges to social workers but it is the threat of danger to the institution that brings them together (Brewer & Walker 2010). While the importance, imminence or priority given to specific fears may differ from one group to another, the perspicacity of risk – a presumption that risk remains lurking like a shark in calm waters and presents a danger to everyone – imposes a limit on enterprise that both restricts and yet binds together all tasks in which a university might engage (Bok 2009).

This is particularly the case with administrative procedures, where processes seeking similar outcomes are replicated in a different manner by other institutions, as occurs for example in course accreditation. Thus, a practice that provides safety or assurance for one is more than likely to be adopted by others if found successful or if endorsed as *best practice* by external monitors. While the specifics of what is done may vary greatly through circumstance, staffing, culture or resources, the motivation – the need to avoid disruption or delay while at the same time ensuring an excellence of product – remains the same, driven in almost all cases by the uncertainty of risk (Duderstadt 2000).

As will be explained in Chapters 3 and 4, it is now accepted that there are two categories of Risk in Australian universities - those within the control of the institution and those beyond its reach (Baccarini & Melville 2011). The first is addressed by careful monitoring and the second by the preparation of contingency plans (Skaines & Cartwright 2008). These, however, are general principles that may not apply under all circumstances. The purpose of the research was to determine whether this precept was true of course accreditation, and if so, the extent to which the need to assess risk has influenced the approval procedures of Australian universities.

## 1.2 Context of the study

There are many bodies that claim responsibility for the oversight of some aspect of Australian universities, some with legislative authority and others with the support of public opinion through the media. These include consumer advocate groups, professional registration authorities, industry associations, and state and federal government departments. All are concerned with the risks and incidents that may damage the reputation of the sector and affect its potential outcomes (Brewer & Walker 2010). Risk management has also become a significant factor in the registration of higher education providers by regulators such as TEQSA (TEQSA 2015).

While much has been written about Risk Management in Australian Higher Education, almost all of this has involved the threat of material or financial loss. A search of Google Scholar has revealed that

there has been virtually no comparative investigation of course accreditation procedures across Australian universities since the pioneering work of Gardiner & Sheehan (1994), much less an examination of the influence of Risk Management on these procedures.

This led to a decision to undertake a broad sector wide review of Risk Management in Course Accreditation even if the breadth and novelty of the topic and the lack of comparative benchmarks meant the loss of fine detail.

### 1.3 The research problem

Three questions were investigated in this study. The first – at a foundation level – is how Australian universities assess proposals for new or amended courses and subjects, a task needed as an essential preliminary as there was little consolidated or comparative data on how this was done. The second concerned the issue of risk in Australian higher education - what it is and how prudent managers address it. The third, and perhaps most significant question brought these two together and dealt with the impact of risk assessment on the course accreditation procedures of Australian universities.

### 1.4 Motivation for the research

There have been few studies of course accreditation in this country, possibly because there have been few complaints about the effectiveness of Australian universities in monitoring their programs as part of their ongoing work (Rowlands 2017). This, together with the prosaic nature of the activity – essentially one of the least controversial in most universities – appears to have failed to attract the attention of scholars and while found in all Australian self-accrediting providers has hitherto passed unmentioned and unnoticed. (Individuals may be object when specific proposals are declined, but there is rarely any criticism of the *procedure* through which this decision was made. The fact that such a silence hovers over the academy – a place where protests are quickly raised and loudly voiced - suggests that the accreditation process is working well, but because of its effectiveness has been taken for granted by those within the institution, similar to the bus that runs on time each morning. Perhaps it is only when something goes wrong that people feel a need to take notice of it (Campbell & Gregor 2004) and if this is true course accreditation in Australian universities appears to be doing very well indeed)

Preliminary reading – particularly the TEQSA *Guidance Note, Course Approval, Design and Delivery* (TEQSA 2013) (Appendix B) – conformed anecdotal evidence that there had been considerable pressure by regulatory authorities (both TEQSA, AUQA and GAA – the last two as predecessors to TEQSA) to improve the accreditation process with a view to gaining greater accountability while assuring public confidence. The content of this work, and its implementation across the Higher Education sector, will be discussed in greater depth in Chapters 7, 8 and 9.]

TEQSA and its predecessors – in their dual role as agents of the government and defenders of the public (Noonan 2015) - appeared equally anxious to monitor risk in all areas of higher education, and this included the management of risk in course accreditation (*TEQSA Risk Assessment Framework 2016* (TEQSA 2016a). Under AUQA and its earlier predecessors this had tended to be done on an institution by institution basis with little reference to its sector wide ramifications. TEQSA, as successor to these bodies, appeared to view the matter as a wider issue (TEQSA 2015a), and might in fact have commended work on the task itself in 2015 (a point unknown to the researcher personally when the project commenced) had funding been available. (Informant 14).

While the researcher has had (and continues to enjoy) close contact with regulatory authorities the need to complete a task that was beyond the resources of TEQSA was not the prime motivation for the project, and the point is raised simply to show that others considered the relationship between risk and course accreditation important.

The interests of the researcher were far more pedestrian. It was known that the interaction of Risk Management with course accreditation procedures was a question of interest to the sector as a whole, but that a response was difficult in the absence of reliable information that the researcher – who had worked in this field for many years - might be in a position to provide.

There were several factors providing encouragement, motivation and at time inhibition;

- **It was believed that reform of the accreditation process was being impeded by an incomplete knowledge of the procedures of other institutions**

It was clear from initial discussions that few universities appeared to have more than a passing knowledge of the risk management and course accreditation practices of their fellows and competitors, and it was suggested by informants that this lack of information inhibited improvement. Course accreditation is expensive in terms of time and resources (particularly the opportunity cost of staff) that might be put to better use elsewhere – a point sometimes clouded by a comfortable familiarity in the minds of many institutions. Despite this, it was known that there had been considerable pressure by regulatory authorities, as well as the universities themselves, to streamline and improve the transparency of current practice - a task made more difficult by the diversity of procedures across the sector and a lack of common benchmarks. There appeared to be no consolidated information on just what Australian universities were seeking when proposals were submitted for approval, or the reasons why unsuccessful applications were declined. It was felt that the mere collection of this information would provide a service to the sector even if nothing more was determined.

- **The risk management component of course accreditation appeared to be frequently understated in official documentation**

Australian universities have clearly described – and rigorously enforced - risk management policies, although there appeared to be little immediate acknowledgement of this in the accreditation procedural documentation of most universities, most of which appeared to understate, if not ignore, the institution's pronouncements on risk elsewhere. This disconnect presented an anomaly that required resolution. It could only be assumed that either the procedural documentation was incomplete, or that risk was downplayed – if not ignored completely – when courses were presented for approval, although neither was believed correct.

- **The focus of international bodies on the management of risk**

TEQSA is not alone in its focus on risk. The need to maintain control over risk (both actual and perceived) forms a common thread through universities across the world as each contends with greater public expectation, improved systems of monitoring and rapidly declining resources (Zaaiman 2017). The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) [*the world wide federation of quality agencies and higher education regulators of which TEQSA is a member*] has long stressed the need for effective risk strategies as a central component of higher education management and has given every encouragement for its members to pursue this matter within their jurisdictions (INQAAHE 2018). This appeared to have been passed over in Australia, and with certain exceptions less attention seemed to have been paid to risk in policy and practice than was the case overseas. The researcher was anxious to determine whether this was in fact true, and saw course accreditation as perhaps the best arena in which the issue could be tested

- **The ambivalence of Australian universities towards risk**

It was noted that while Australian universities seemed anxious to demonstrate that they were proactive in the identification and mitigation of certain types of risk (perhaps to satisfy the requirements of regulators) the application of risk management appeared inconsistent, and was focused more on the threats that were obvious than on those that were the most dangerous (Brewer & Walker 2010). Thus, there was constant emphasis on financial, safety and welfare risks but much less on the threats to the reputation of the institution or the maintenance of academic standards. (Baird 2013). This unbalanced approach aroused curiosity, as either the universities were genuinely unconcerned about risk in other areas, were certain that all staff were familiar with their practices (and hence felt it unnecessary to

refer to them) or had simply omitted them from their documentation through oversight. This was particularly the case with course accreditation procedural documentation, where there is virtually no mention of risk at all.

- **The scope of the study**

It became apparent from an early stage that a study of Risk in Australian Higher Education could well dominate the thesis at the expense of course accreditation. This was felt undesirable as risk in tertiary education presents a vast if under explored field that could swamp the research and quickly become unmanageable. For this reason, it was decided to restrict the study solely to the impact of risk management on the accreditation procedures of Australian universities.

## **1.5 The Conduct of the Research**

It has never been easy to investigate the inner workings of Australian universities. Not only is there a lack of precedent but in the current environment both caution and discretion are required if sensitivities are to be avoided while information is gathered. It is not as though Australian universities have numerous skeletons in their cupboards – indeed quite the contrary – but there is a sense in which many institutions regard their internal workings as private and confidential, and hence not appropriate for public discussion. Australian universities have long been secretive about their internal operations, and while this has not been made worse by the rise of external regulators such as TEQSA, the presence of these bodies has added an edge to issues that may become controversial and which need to be handled carefully (Davis 2017) For this reason it a careful pathway was plotted lest the researcher – who was not a complete stranger to these matters – was denied information from peers and colleagues.

To avoid this it was decided to concentrate on material that was already in the public domain and only to seek clarification where there appeared to be gaps in the record or where uncertainty was possible. In the end many of these fears proved completely unnecessary. The researcher was welcomed by informants and given far more material than he could use. At the same time the need for caution shaped the research and in turn has moulded the writing of the thesis.

### **1.5.1 The structure of the thesis**

The research involved what appeared to be two completely separate issues. The first was the question of how Australian universities accredit their courses – both what they look for and how they procedure these requests from stage to stage behind the scenes. The second concerned the management of risk in Higher Education. On closer examination, however, the two are much closer than might otherwise appear. Australian universities seek to provide the best outcome for those receiving instruction through a careful scrutiny of course proposals. There is always a risk, on the other hand, that untoward events may happen, causing detriment, embarrassment and potential harm to the institution and its members. The procedures for examining courses have therefore been shaped to minimise the occurrence of risk, and to ameliorate the consequences should it appear. The key question then becomes how risk management has impacted upon course accreditation procedures.

The thesis follows a sequential pattern to address this question. Before one can discuss course assessment in a meaningful manner it must first be placed in context with all other university procedures, a task made complex by the variation in procedure that exists from one institution to another. The procedures through which Australian universities assess their courses are therefore introduced in Chapter 2, and then discussed in greater depth in Chapters 7, 8 and 9.

The term “Risk” is ambiguous in a tertiary context, and to avoid misunderstanding it was felt essential to devote a chapter (Chapter 3) to explaining the nuance of this term as used in Australian Higher Education, which differs subtly from its application elsewhere, particularly in the question of “Risk to whom?” and “Who or what are we seeking to protect from further harm?”

Chapter 3 deals with Risk in a broad sense, and to lay a more appropriate foundation for its interface with course accreditation it was believed necessary to narrow the focus by discussing the question of risk from the perspective of the universities (Chapter 4)

Chapter 5 deals with the Methodology governing the research, which was essentially based on the documentation produced by the universities explaining their accreditation procedures, supplemented where necessary by the interview of staff. Chapter 6 reviews the data derived from both sources.

Chapter 7 explains the findings from the research, which are discussed in greater depth in Chapter 8. These findings further refined in Chapter 9 with implications for the system and its regulators. Chapter 10 provides additional information on the theoretic considerations referred to elsewhere and offers suggestions for future research.

A chart giving the structure of the thesis, together with the intent of each chapter and the point that each is intended to demonstrate is provided on the following page (Figure 1.1).

CHAPTER TITLE	INTENT OF THE CHAPTER	POINT(S) TO BE DEMONSTRATED
CHAPTER 1 Introduction	To provide an introduction to the thesis	That a nexus may exist between course accreditation and risk management in Australian universities that requires further investigation
CHAPTER 2 Course Accreditation in Australian Universities	To provide an overview of course accreditation in Australian universities	To provide an overview of course accreditation in Australian universities
CHAPTER 3 The Theory of Risk in Higher Education	To discuss the meaning and boundaries of risk in Australian Higher Education, particularly the threat to reputation	That there is a common approach to risk in Australian Higher Education as shown by the literature, the practice of the institutions and TEQSA. The greatest threat faced by institutions is not damage to persons or property but loss of prestige, public confidence and harm to reputation
CHAPTER 4 The Implications of Risk for Higher Education Institutions	To describe the ways in which Australian universities address risk and handle its implications	That Australian institutions address risk in all their activities and procedures, including course accreditation
CHAPTER 5 The Methodology of the Research	To explain the methodology of the research	That the research was in two parts, based primarily on documentation, with interviews to fill gaps and uncertainties
CHAPTER 6 The Data Derived from University Documentation	To discuss the material published by the universities in the light of informants' comments	That the information provided was reliable and demonstrates an awareness of risk throughout the accreditation process
CHAPTER 7 Findings	To discuss the findings from this data	That there is an incomplete knowledge of the accreditation system - and its risk management - by immediate participants
CHAPTER 8 Review and discussion of these findings	To draw together and assess this data	<i>KEY FINDING - That few participants have training in risk management and as a consequence, Australian universities protect themselves against risk through a strict adherence to rigid protocols</i>
CHAPTER 9 Discussion in the light of the topic	To confirm this conclusion through further discussion and a series of case studies	
CHAPTER 10 Conceptual Framework and Conclusions	To provide additional information on the theoretic considerations referred to elsewhere and to offer suggestions for future research	That the conclusion reached is consistent with the literature in parallel fields and may well apply to the majority of Higher Education activities and procedures. If so, this may require a major re-evaluation of these functions and operations

**Figure 1.1 Structure of the Thesis**

[It will be noted that no separate chapter has been devoted to a literature review. There are two reasons for this. The first is the scarcity of literature on course accreditation and a significant absence of material on risk management in this field, a fact that would make a separate chapter, if included at all, extremely thin. While there is an abundance of material on Higher Education Risk Management in general - and these references are cited where appropriate in the pages that follow – there is virtually nothing on its application to the accreditation procedures of Australian universities. The second reason concerns the purpose of a literature review. In a well-trodden field, there is every reason to explain what has gone before, lest the trio ends up exploring dead ends while reinventing wheels. In untouched areas where there are few precedents, such as risk management in course accreditation, this hardly applies. For this reason, the literature cited throughout this work has been integrated with the text as far as possible rather than placed in a chapter of its own].

## **1.6 The Justification for the research**

### **1.6.1 Lack of knowledge about course accreditation procedures across the sector**

As mentioned previously, while all Australian universities have the right to accredit the programs leading to their awards there have been few if any attempts to investigate the manner in which this is done, or to compare accreditation procedures and policies across the sector. This is unfortunate, as while the staff in most institutions tend to be aware of the requirements of their employer, and are conscious of their own role in the process, the majority appeared from anecdotal evidence (and confirmed later by their response to questions from the researcher) to be completely unfamiliar with what occurs in other universities. Perhaps, as suggested in a preceding paragraph, the reason why there has been so little investigation of course approval lies in the fact that the existing protocols appear to be working well despite their diversity, and few have felt a need to call into question something that the universities are doing effectively. At the same time this insularity and lack of communication was believed to be impeding improvement and needed to be addressed.

Apart from the work by Gardiner and Sheehan (1994) there appeared to have been no comparative study of course accreditation procedures across Australian Higher Education, and it was felt that a review of current practice – even if these practices were working effectively - was long overdue.

### **1.6.2 Regulatory Pressures on a clarification of procedures**

Australian universities are coming under increasing pressure from regulators such as the Tertiary Education Quality and Standards Agency to make their procedures more open and accessible to the public (TEQSA 2015b). This is particularly the case with Risk and its management, which TEQSA now uses as a benchmark for the purposes of registration (TEQSA 2015d).

While TEQSA has indicated that its first priority in regard to course accreditation will be the procedures used by its panels to assess the programs of non self-accrediting providers (*TEQSA Corporate Plan 2015 – 2019*) a review of current university accreditation procedures has been foreshadowed. As a result, a number of universities have been engaged in revising and streamlining their accreditation procedures, a trend that seems likely to continue. While the researcher was unaware of the importance placed on this by both regulators and the sector when the project commenced, the research – which may make a valid albeit unintentional contribution to this wider study – has become both relevant and extremely necessary

### **1.6.3 The investigation of administrative procedures within Australian universities**

While course accreditation is sometimes seen by outsiders as a purely academic issue (i.e., is this proposal of sufficient academic merit?) an equal responsibility descends on those who integrate and coordinate the process, often behind the scenes within the closed doors of the institution (TEQSA 2014c). It would appear from an extensive review of Google Scholar that there have been few if any studies of the administrative procedures of Australian universities (Meyers 2012). At the same time the administrative aspect of Australian Higher Education remains a valid field of study, particularly at a time when administrative procedures are changing rapidly under the pressure of regulators, technology and greater demands for transparency and accountability from the public

(O'Connor & Moodie, 2007). These changes in turn are having a significant impact on areas such as risk management and course accreditation (McMaster 2011).

The difficulty, unfortunately, is that few have the contacts to commence this study or to gain the trust of informants. While insight into the course accreditation and risk management procedures of Australian universities may be valuable in itself, a more general and universal contribution to knowledge seems likely to come from the lessons the researcher has learnt (sometimes the hard way) about the conduct of research into the hidden, and often closely concealed workings of tertiary institutions. It would appear from the absence of literature that few if any academics have attempted to examine the inner workings of Australian universities, and that a close study of these matters has been left to the Industrial Officers of the (Australian) National Tertiary Education Union (NTEU) or the auditors of TEQSA or AUQA (*the latter being the Australian Universities Quality Agency, the body that preceded TEQSA*), all of whom have a specific and quite divergent agenda. As a result, it was found when the research commenced that there were few precedents or guidelines for work of this kind, or even for gaining access to universities, and the researcher was forced to learn much through trial and error. It is hoped that the blunders he has since retrieved will assist those who follow in his footsteps.

## 1.7 Conceptual framework

The research involved a study of the manner in which Risk Management has impacted upon institutional procedures when courses and subjects are presented for accreditation. The perspective taken was that of an outsider investigating a phenomenon rather than an insider seeking to explain (or worse, to justify) an internal activity. While the researcher could hardly call himself a stranger to this field, such an approach was necessary if the study was to be confined to the material derived from documents and informants, even though it meant that much had to be excluded that had been learnt from many years of professional work.

For this reason, it was assumed from the beginning that the researcher knew nothing about either Course Accreditation or Higher Education Risk Management and had been forced to approach both topics *ad novo*. This produced an occasional tension between what the writer knew and what he was told but this was quickly suppressed lest it bias the findings.

To ensure this neutrality, course accreditation was deliberately viewed as one of the many administrative procedure found in a university rather than something special, such as a quality filter, and this in turn allowed it to be examined through the wider lens of systems theory with all the strengths and failings of that approach, without the need to make any judgments on its effectiveness or educational benefit. For this reason, it was the sector wide procedure that was examined, not the outcome.

In an ideal world course accreditation should follow an established pathway and proceed without interruption, similar perhaps to the way in which a university maintains its payroll, allocates parking space or handles its other routine activities (Craig 2015). Unfortunately, this has never been possible, as course accreditation, while a purely internal activity, has always been subject to external influences, one of which is the control of risk. Hence, risk management was viewed throughout the research as an intrusion - a factor that interfered with the smooth working of an otherwise stable and predictable operation which imposed an additional burden on participants.

In such a model course accreditation could be seen as an arena – a field in which a range of interests acted in a largely predictable manner to further their own interests, provided this brought benefit to themselves and the institution. This idyllic situation was disrupted by the need to consider risk, similar to the way in which a shower of rain might change the nature of play in a football match. The key question – indeed the core of the research – lay in the issue of just how much change from the norm this disruptive influence had caused.

A football commentator (unlike a meteorologist) would place emphasis on describing the game rather than the rain that disrupts it, and a similar approach was taken throughout this study. Thus, the concept that underlies the work is that course accreditation has evolved over many decades to become an effective vehicle for maintaining standards and consistency in Australian universities but has been disrupted in recent times by the need to consider risk.

The reason for taking this approach lies in the fact that course accreditation has a long history in Australian Higher Education, while risk (at least in its current form) is of recent origin with an uncertain application. While course accreditation is only one of a vast number of systems used to support the work of a university it remains sufficiently independent and self-contained to be treated in isolation, without interference from its peers and counterparts. (Abdellah, Babbit & Heileman 2016). This tightened the focus of the research and avoided the need to investigate the collateral and parallel systems that operated in conjunction with it.

Risk management is far structured – if viewed as a system at all - because it is required to cover a greater range of circumstances, each of which has its own specialised requirements (Possusamy & Pandurangan 2014). As a result, risk becomes a more personal matter, based predominantly on the fears of those responsible for its avoidance, and for this reason is less amenable to the tools of systems analysis. Thus, in the conceptual model used for this project course accreditation was seen as the rock over which the waves of risk are continually breaking from all directions. The rock is stable despite the battering it receives and this stability provides a permanent point of reference. The waves, on the other hand, are multi-directional and far more exceptional, unpredictable and ephemeral.

## **1.8 Limitations and Restrictions**

There is much that is peculiar to Australian universities, as can be referenced through the publications of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) – the world-wide association of tertiary regulators of which the Tertiary Education Quality and Standards Agency (TEQSA) is the Australian member. To avoid these distractions, it was necessary to concentrate on two aspects of their operation only – risk management and course accreditation – even though the practice of both varies greatly from one institution to another.

It is hard to disguise the identity of an Australian university. There are only 43 bodies that are permitted to include the word “University” [*a name protected by state and commonwealth legislation*] in their title, and as the characteristics of each are distinct and well known, complete anonymity is impossible. For this reason, where a document has been released into the public domain by a university the name of the institution has been included in the text, with no attempt made at concealment.

This was not the case with informants, who were assured that they will not be identifiable in the thesis. For this reason, both the office held by informants and the university they worked in have been hidden behind a frontage that makes detection extremely difficult.

Course accreditation is in a state constant change across Australian Higher Education and there is no guarantee that the practices current today will remain that way in the future. Hence, a snapshot was made of the sector as at February 2017. A number of institutions indicated to the researcher that their accreditation procedures were under review and likely to be amended (or at least modified or streamlined) by the course of the year. Where these projected changes have yet to be approved, they are not foreshadowed in this document.

## **1.9 Contribution to Knowledge**

As mentioned in Section 1.4 there are few signposts or benchmarks to assist those who are seeking to investigate the approval of courses in Australian universities and for this reason the study was

intended as a guide to the sector generally, rather than a specific study of any institution. This led to a decision to undertake a broad survey in preference to a more intense but narrower investigation of the reasoning underlying the directives and instructions of specific institutions. The need to fit within the prescribed word length – a university requirement – meant that far more data was gathered than could be presented in a single document. Hopefully it may be possible to have this published elsewhere to provide a basis for future studies.

The achievements of the research are:

- It provides a systematic comparison of course accreditation procedures across Australian universities as at 1st January 2017. While this data will become obsolete quickly, as the accreditation procedures of individual institutions are in a state of constant change, it may at least provide a foundation for future upgrades, both for historic and operational purposes.
- There have been few previous attempts to examine the inner workings of Australian universities, possibly because of a lack of information, but more probably because the vast majority of researchers are reluctant to explore (and potentially expose) the failings of their current or future employers. This is a pity, as the establishment of any “no-go” area across the spectrum of research creates a vacuum that can only be filled by speculation rather than evidence. The researcher occupies an unusual position in that he is known and hopefully respected by academic and administrative colleagues from across the sector, most of whom, one trusts, are prepared to overlook his previous involvement with regulatory bodies and the oversight of universities. As an outcome from the research a model has been developed that others may follow should they examine this field in the future. It is extremely difficult to gain access to a university, or to be allowed to remain there once one arrives and starts asking questions. It is hoped that others will benefit from the researcher’s embarrassments and mistakes. *[More information on the conduct of research into universities is provided in Chapter 5 and as an appendix]*
- The ultimate finding from the research – that Australian universities rely more on procedures for the safeguarding of their integrity than on the training of staff – may come as no surprise to those working in the industry. It is a point that is frequently overlooked, however, and may explain many of the grievances that occasionally surface about the bureaucracy of the academy or the “pig-headedness” of those who work within it. It is strongly suspected that this applies to many areas over and above course accreditation and may form a fruitful area for investigation in the future.
- The key question is Risk – a word that is mouthed frequently in offices and tea rooms, but which few in Higher Education are prepared to define further. In undertaking this research, it was necessary to investigate more fully just what Australian universities mean by this term and how risks were addressed – an issue of interest to TEQSA as well as researchers. It is not suggested that any finality has been reached on this issue – the research focused on only a small area of activity where risk plays a part and was forced by necessity to leave many attractive paths and desirable destinations unexplored. If, on the other hand, awareness has been raised and discussion commenced on the nature of Risk in Higher Education, both as a haunting ghost in common rooms and an enraged elephant in boardrooms, the research has been worthwhile.

Scope of the Research	The research is confined to the 40 Australian universities and excludes all other post-secondary providers	Australian universities, unlike other providers, have a right to self-accredit their programs. <u>The commonality linking these institutions lies in this autonomy</u> , although as no procedure has been legislated there is wide variation in practice and policy from one university to another
Value of the Research	There have been no recent studies of approval procedures across Australian universities and no examination of the influence of risk management on them	Course accreditation appears to work effectively and for this reason attracts little attention, to the point where few institutions seem aware of how their peers engage in the same process. This in turn means that there is little comparison and less opportunity for sector wide improvement
Conduct of the Research	There are few precedents for the conduct of research into the inner workings of Australian universities	Prudence was needed to avoid a negative response from universities. Publicly available documents were used as primary source material, supplemented where necessary by the interview of appropriate informants to fill gaps and clarify uncertainties
Context of the Study	Risk management has become increasingly important largely through the influence of TEQSA	It would seem logical, therefore, to examine course accreditation through the lens of risk management, noting in particular the impact that the latter has had on the former
Conclusion from the Study	Risk management plays a significant role in course accreditation procedures, although this is largely hidden within procedures and may well be applied unwittingly by staff	There is little opportunity for the training of staff in risk management. Australian universities therefore depend on an intelligent following of procedures which contain embedded risk management practice, rather than on the personal judgment of individuals. This may be equally applicable to many other aspects of university operation

**Figure 1.2 Summary of the Argument of the Thesis**

## **1.10 The Researcher's Background**

It is felt that it would be inappropriate for the researcher to deny his prior association with the sector. The researcher comes from a higher education regulatory and compliance background, and has an extensive knowledge of Australian universities, including their politics, faults and failings, and despite every effort it has been impossible to exclude this from the research. The candidate's work in the discipline of Strategic Course Analysis was known to the sector, as was his familiarity with higher education administrative procedures and the terms and jargon that are part and parcel of these activities. He was (and is) known personally to many in the industry through his links with the Association of Tertiary Education Managers (ATEM) and the Australasian Association for Institutional Research (AAIR), where he is viewed as a colleague rather than a student. While this has opened many doors, it made it correspondingly difficult to maintain impartiality, particularly where controversial issues were involved.

It became clear as the task unfolded that it would be impossible for the writer to ignore his background knowledge and insight, but at the same time a conscious effort was made to ensure that this caused no bias or prejudice to the study. This was particularly the case with the data provided by informants, who may well have revealed more to the researcher as an insider than they might to a stranger. To avoid any problem this might cause only data that is already in the public domain has been attributed to any particular university, and where quotes from informants are provided, these – as mentioned above - have been completely anonymised.

## **1.11 Summary**

This research is both novel and needed. While risk management has become a central component of university management and for this reason requires much closer investigation by others, this remains a thesis on course accreditation rather than an investigation of Higher Education risk management or risk avoidance. All research involves a balance between concepts that lead in the end to consolidation and synthesis, and the pages that follow trace the influence that risk management has had on the accreditation procedures of Australian universities. Chapter 2 starts this discussion by exploring Australian universities, their governance and course accreditation.

## Chapter 2 Course Accreditation in Australian Universities

*This chapter provides an overview of the course accreditation procedures of Australian universities and introduces the question of Risk as a component of these operations. Chapter 3 will expand on this, and deal with the theory of Risk in Australian Higher Education while Chapter 4 will explore the implications of Risk for the sector.*

While all self-accrediting providers in Australia have complete independence in regard to the methods used to assess the programs leading to their awards, these form part of the internal governance of the institution and hence, cannot be examined in isolation from the other procedures of a university. For this reason, little understanding can be had of the course accreditation processes in a particular institution (or risk management in the same institution for that matter) without a corresponding discussion of the structure, power relationships, organizational responsibilities and strategic management strategies of the university involved, and the impact this has on its daily operations.

### 2.1. Boundaries

As mentioned in Chapter 1 this study has been confined to the 40 self-accrediting universities in Australia for the purposes of compatibility, and thus avoids those organizations where the structure or governance may be different, such as non-self-accrediting institutions, off shore providers authorised to teach in Australia, or other specialised (but non-university) bodies licensed to self-accredit higher education awards, including theological seminaries.

It should be noted that while there are a number of universities that were not established by government initiative (Bond, The Australian Catholic University and the University of Notre Dame Australia) all have been created by separate Acts of Parliament, and are subject to the same requirements and expectations as the so called *public* universities and as a general rule have similar structures, governance and procedures to their state originated counterparts. For this reason, these institutions have been included in the study.

### 2.2 Course Accreditation as an aspect of Higher Education Management

#### 2.2.1 The authority given to universities by virtue of their enabling legislation

The legislation establishing Australian universities has given these bodies considerable autonomy in the conduct of their daily activities, such as teaching, research, the enrolment of students, the recruitment of staff and the admission of graduands to degrees. This autonomy includes the right to accredit the courses of study leading to the awards of the institution without external interference. At the same time, Australian universities - established under state legislation but funded largely by the Commonwealth - are monitored closely by both areas of government and are required to make an annual report on their work, to keep their records available for audit, and to abide by all Acts of Parliament enacted for their welfare (Victorian Auditor General 2018). Legally, Australian universities are regarded as charities operated at arm's length from the Government (Cunningham 2016). In the public mind, however, they are as much a responsibility of Parliament as the police force and hospitals (Harman 2009)

#### 2.2.2 Subsequent legislation impacting on this authority

In general, Australian universities are entrusted to manage their internal affairs with minimal interference but remain subject in all cases to the oversight of state and federal governments (Norton 2016). In addition to their enabling legislation (which prescribes the structure of their governance and gives internal authority) Australian universities are required to adhere to all other Acts that may be

passed by Parliament, such as the Education Services for Overseas Students Act (2000) (ESOS Act - as amended 2016) and the various Commonwealth Anti-Discrimination Acts (1992 – 2004) (Australian Government 2016).

### **2.2.3 Internal and external quality measures relating to universities**

Australian universities have long had internal systems (normally based on peer review) for assessing the quality of their activities. To ensure consistency across the sector (and thereby assure public confidence in what is provided) the Commonwealth has instituted two external agencies to monitor quality in higher education -- the Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Research Council (ARC) although as the latter is less relevant to course accreditation it will not be mentioned further.

The role of the TEQSA is to act as “the centre of a new standards based quality assurance framework” (DEEWR 2009). This does not imply that the pre-existing procedures for internal review have been made obsolete or should be abolished. TEQSA’s task, as confirmed by its enabling legislation is to provide unity, co-ordination and effectiveness to these systems, not to replace them (Ewan 2010).

Course accreditation is one of the procedures used to ensure quality in Australian universities and has existed in various forms from the commencement of Australian Higher Education (Forsyth 2014). While conducted without external interference – a freedom it shares with risk management - the fact that institutions are now accountable to an external agency (in this case TEQSA) for the effectiveness of their quality monitoring systems has had a significant impact on the clarity with which course accreditation and risk management procedures are described. The pressure of external monitors has been less impact on the procedures themselves, however, most of which have been developed without interference from regulators as part of the internal governance of the institution. Indeed, it would seem that as far as course accreditation and risk management are concerned, TEQSA is less interested in what might be done by specific universities (provided these procedures are fully documented and faithfully applied) than it is in the resulting outcome (Shah & Jarzabkowski 2013).

As will be explained in Chapter 3, courses of instruction leading to awards are normally developed internally by the staff of Australian universities, often by those who hope to conduct the teaching. These are submitted for consideration to the faculty or other unit to which the staff member belongs, and if that body gives its support, the concept commences its passage through the accreditation procedures of the wider university. At any stage – either within the faculty or while passing through the accreditation process - the procedure can be stopped and the proposal sent back for amendment.

This right to “defer” approval (proposals are rarely rejected outright – where there is doubt or uncertainty a decision is normally deferred until amendments are made) is an important instrument of university governance because:

- Approval to offer a course implies an endorsement of its content and relevance. Courses are not regarded as being offered by individuals (even though it may be a single staff member who develops and teaches the proposal) but by – and in the name of – the institution as a whole. Thus, if a course proves unsatisfactory it is the reputation of the institution that suffers, not simply the person or groups most intimately associated with it.
- Approval to deliver a course involves a long-term commitment on the part of the institution to make available the resources needed for its operation, possibly at the expense - or even the curtailment - of other activities. Thus, by supporting particular proposals while declining others, the institution moulds and controls its future nature.
- Approval also involves an acceptance of all of risks associated with the proposal. These may be suspected in advance (in which case the institution must be prepared to take a chance on

their likelihood) or may emerge later. The responsibility, however, shifts with approval from the individual lodging the proposal to the institution as a whole. For this reason, the right to defer consideration provides valuable breathing space while additional information is sought (Gurian 2009).

As course approval is for a limited period in all Australian universities (normally 5-7 years) a refusal to renew approval, which a university is not required to justify beyond its walls, can be used to gradually refocus the direction of the institution and forms another instrument of control – a matter of interest to Governments if this threatens international students (National Code 2018) but otherwise of no accord. [The abandonment of disciplines is another matter. Separate approval is required from the Commonwealth if a university wishes to withdraw completely from a discipline, as this may have a significant impact on Government policy and funding. Institutions can terminate courses at their discretion but require Government consent to cease all teaching in a particular area (TEQSA 2017b).] While the right to “defer” approval - and thus effectively withhold it - is rarely mentioned in course accreditation documentation it remains a powerful weapon in the armoury of leaders and managers in their strategic management of the institution (Nickel 2011).

The ability to defer occurs less frequently in Risk Management, as risks are usually embedded in wider initiatives (many of which are beyond the control of the institution), are more nebulous and speculative, and unlike courses, are rarely considered in isolation from their matrix. Institutions can decline to take risks, but the procedures to identify, assess or moderate these factors are far more amorphous than they are with courses, and tend to be justified on the grounds of caution and prudence rather than procedure. Despite this, a refusal to take risk – no matter how this might be expressed or the grounds on which it is justified – remains an effective weapon for those who wish to delay change or otherwise shape the structure of Higher Education (Scott, Coates & Anderson 2008).

## 2.3 The intent of Australian Higher Education Providers and Regulators

It may be deceptive to discuss the intent behind course accreditation – in other words the outcome sought - in isolation from the need to avoid (or at least ameliorate) risk, and no attempt will be made to do so. At the same time the issue can be viewed from a range of perspectives;

### 2.3.1 The Intent of Universities

While there are numerous references to “Quality” in the documentation provided by higher education providers – almost to the point where this might appear to be the sole aim of the process – the term is essentially meaningless, and it would seem from a closer reading that course accreditation is intended to address ten areas of governance and, in turn, ten areas of risk: (Taken with expansion from Tomas et al. 2014 and from Smith P 2015)

- **Reputational Risk** – It would appear that one of the primary aims of course accreditation is the avoidance of harm to the university and its members, both staff and students. The end result should this fail – all compassionate feelings aside – is likely to be damage to the reputation of the institution that may lead in turn to a loss of confidence by supporters and benefactors (the primary philanthropist in Australia being the Commonwealth Government). The outcome should this eventuate may involve more than a loss of confidence in a particular provider – although that would be serious enough – and cause a loss of faith in the sector as a whole, with the community no longer trusting or appreciating its universities. This is prevented at a course accreditation level by ensuring that proposals fall within the strategic scope of the institution, are deliverable as described, are grounded on reliable scholarship, will lead to specific outcomes, and will strengthen the nature, image and future development of the sector as a whole, not simply of the body delivering the course or conferring the award

(Agasisti 2017). Loss of reputation is the ultimate fear of Higher Education providers (SafeTrac 2017) and the apical aim of course accreditation is to prevent this happening (Parker, Dempster & Warburton 2018)

- **Financial Risk** –No university can afford to operate at a fiscal loss (Selingo 2013) and those approving courses must be certain that there will be financial loss to their institution. For this reason, there is a need to ensure that course proposals are viable, that demand exists, that programs can be funded for the whole of their life, and that their introduction will not impose a burden on other institutional activities (Deloitte 2016). While financial risk may be less significant in the long term than reputational risk – essentially because it involves a threat to one institution rather than many – it remains an area of concern for those charged with the stewardship of their institution (Parker, Dempster & Warburton 2018) and hence plays a significant role in course accreditation (TEQSA 2017e)
- **Foreseen Risk** –Prudence should ensure that potential hazards (both material and immaterial) are identified and managed before they cause harm. This is best done within a collaborative group environment where experience can be shared, rather than by individuals (Zaaiman 2017). Identification of foreseen (and foreseeable) risk is expected to form part of the accreditation procedure of all Australian universities (TEQSA 2019)
- **Commercial Risk** – Commercial Risk is quite different from Financial Risk. Higher Education is a cut-throat business (Hale & Vinna 2016) and there is a need to remain competitive through a constant monitoring of the strengths and weaknesses of comparable programs offered by rival institutions. For this reason, no course is ever considered in isolation or solely on its intrinsic merits. The approval of courses requires a constant critique of new proposals against what others are offering, or are likely to offer in the future, to ensure that what is provided will be attractive to students, sponsors and employers. It takes a significant period to publicise a course, recruit students and commence teaching, much less to produce graduates, and even with the greatest diligence there is a danger that what is approved may be undercut by superior products offered by others. This risk can be reduced by getting courses to market as quickly as possible, although prematurity carries its own disadvantages. For this reason, there is a need to be prompt rather than hasty – a trait that is inherent in the accreditation procedures of all Australian universities (Abbott 2004)
- **Outcome or Academic Risk** – Academic risk increases with time, as new research makes current knowledge or methods of delivery obsolete (Fishman & Sledge 2014). This risk can be minimised by ensuring that courses commence with the most recent developments in the field and are delivered in a manner that ensures both staff and students will “benefit” from what is available This is not the place to explain the meaning of the word “benefit”, but is influenced by (among other things) the relevance of content, the mode of teaching, the development of attributes and the employability of graduates. The danger lies in the fact that these things may not be achieved and that critics (such as students, other universities, regulators or financial sponsors) may claim that what has been approved is sub-standard, lacks merit or is valueless, to the detriment of the institution. Thus, the assessment of academic or outcome risk is expected to form part of the course accreditation procedure of all Australian universities (MCEETYA 2000)
- **Disruption Risk** – Universities are places of dissent that rely on cooperation (Coates 2012) and it is important ensure that proposals are sufficiently publicised within the institution to allow objections to be heard and disputes adjudicated before they cause disruption. Disruption is usually subtle in Higher Education as overt misconduct or flagrant disobedience can be quickly identified and promptly disciplined. The danger, on the other hand, is that discontent will spread through a university like rust in a car (Open University 2017). This is prevented by providing the greatest opportunity for objection should this be

necessary, and forms part of the operational procedures of all Australian (and many overseas) universities (Shattock 2014).

- **Internal Risk** – As mentioned in the previous paragraph, universities rely on the co-operation of their members, with much done “under the counter” as a favour to colleagues without any mention of this on statements of official duties. This “give and take” between staff is highly dependent on personal feeling and the maintenance of harmonious relationships but is absolutely essential to the smooth working of the institution. Internal risk involves the threat that this may change, and that services and resources will cease to be available should those who have agreed to provide them fall out with each other or move elsewhere. Hence, most internal arrangements are “locked in” as part of the approvals process, and hence become subject to minimal interference and external oversight should personnel change or ill feelings arise. This “agreement to ensure continuity of services and resources” now forms part of the accreditation procedure of all Australian universities (Croucher, Marginson & Wells 2014)
- **Recruitment Risk** (Sometimes known as Demographic Risk) – This involves the recruitment of students rather than staff. There is always a risk that courses will be under subscribed irrespective of their merit, or worse, that the university will be committed to the long term offer of programs that will run at a financial loss. This risk is countered by the close monitoring of markets, effective advertising, sound publicity and the availability of information on course content and outcomes. The manner in which students will be recruited (and the certainty that these persons are actually available) forms yet another part of the accreditation procedures of Australian universities (Murdoch University 2017)
- **Administrative Risk** – Courses must be administered, and steps are always taken to ensure that all administrative arrangements are (or will be) in place for students to enrol and for teaching to commence. The risk is not that there will be no support for the mounting of a course – a far greater difficulty lies in the fact that everything requested may be available but may prove inadequate for the task. Certainty of administrative support also forms a part of the accreditation procedures of all Australian universities (Meyers 2012)
- **Records Risk** – Universities have a responsibility to maintain adequate records of both courses and students, often for an indefinite period. Records once created are rarely lost or destroyed in Australian universities – the difficulty lies in the need so ensure that they are made in the first place, are comprehensive and accurate, and that they are permanently archived. Again, the maintenance of records forms an essential part of the accreditation process across all Australian universities. (TEQSA 2017d).

There may be numerous specific or local risks (the threats faced by a regional university are sometimes different, for example, from those of its inner-city counterparts) and these are often reflected in procedures of particular institutions. At the same time the risks listed above – and the measures to avoid them – appear common to the accreditation procedures of all Australian universities (Smith 2015).

It will be noted that none of these threats involve the word “Quality”, possibly because this ill-defined term is incapable of easy assessment. (“Quality exists as an intangible factor in the mind of each individual, never in the collective wisdom of a committee or group” – NSW Health 2016). It may well be the intent of Australian universities to provide “quality courses” but this is not something to be handled through the risk management of course accreditation

### 2.3.2 The Intent of Regulators

The primary higher education regulator on Australia is TEQSA - other regulators with a more limited (but highly influential) scope are either internal but independent (such as the Standards & Compliance

Committee of the Australian Catholic University) or are linked to a professional regulatory body, such as the Nursing and Midwives Accreditation Council.

Higher Education regulators have two primary responsibilities:

- Establishment and oversight of standards (including uniformity between providers and compliance with legislative requirements)
- Protection of the reputation of the sector, and beneath that the protection of the Government or the constituents they represent (TEQSA 2015a, TEQSA 2015c)

Higher Education regulators in Australia- unlike certain of their counterparts overseas - have traditionally kept themselves remote from consumer (or student) protection, or the resolution of individual complaints, other than in the most general of terms, as this is seen as the responsibility of others and is normally handled under consumer protection legislation or the ESOS Act. (TEQSA 2017). The intent of Australian regulators is to oversight the sector, and this includes the way in which tertiary providers manage risk.

For this reason TEQSA has adopted a *risk based* approach to Higher Education (TEQSA 2015a), although this is based on *institutional risk* (the possibility that a provider will be unable to deliver all that is expected, with the failure affecting the sector in general) rather than the potential for harm to persons, colleges or campuses. (“Unimutual [*a widely used university insurer*] provides protection to persons and property. TEQSA is concerned solely with the threat to reputation” – Informant 12) This includes, in the case of self-accrediting institutions, ensuring – among many other things - that there is adequate provision for the assessment of proposals before the commencement of classes, and in the case of non-self-accrediting providers, the assessment of proposed courses by means of an external panel (TEQSA 2017b). TEQSA does not prescribe the manner in which self-accrediting providers should make this assessment. As far as TEQSA is concerned the key point is that an established protocol, known to staff and available to the public, should be used for all course proposals and that it should be applied consistently irrespective of the circumstances (TEQSA Course Accreditation and Reaccreditation Policy 21<sup>st</sup> May 2018 – (TEQSA 2018d))

Institutional risk involves the assessment of risk from an external perspective conducted with a wider scope than is needed for internal management purposes. *Internal risk* tends to deal with those risks that are within the control of the institution and is designed to protect the organization from self-harm. *Institutional risk* (which is based largely on a comparison between institutions, or of individuals against the norm) is designed to protect the industry itself rather than its practitioners (University Business Executive Round Table 2012). TEQSA and other regulators focus on Institutional Risk and leave internal risk in the hands of the universities (TEQSA 2017c). The intent of TEQSA is therefore to safeguard the sector as a whole rather than the members that comprise it

This has a significant effect on course accreditation procedures, one of the many fields in which the objectives of both parties may come into conflict. The ultimate intent of regulators is the maintenance of stability by ensuring that existing values and relationships hold firm and that there is no decline in standards (TEQSA 2017c). The intent of providers, on the other hand, is to challenge the status quo by seeking to do better than their rivals and competitors, and thus to extend their business and influence even though this may destabilise the system. This produces a tension between regulators and providers that will be discussed shortly.

### **2.3.3 The Intent of Third Parties**

There is a third group that has an interest in the risks associated with course accreditation, and this embraces all who have a relationship of some type with the university but no voice in its governance. This includes suppliers, contractors, the local community, and finally students, most of whom can be no more than passive onlookers when proposals are submitted for approval.

These persons also face risk, but of a different type, and this involves risk to themselves rather than to the institution or the sector. In the case of contractors or suppliers the risk is largely financial (their services may no longer be required and their hip pockets will suffer). In the case of the community the risk involves disruption and inconvenience, while in the case of students the risk involves their future careers. There is little that any of this group can do to change the situation, other than to share their concerns with each other. Essentially, what each desires is continuity. The university may or may not be an exemplar of academic scholarship, it may have long since lost the respect of its neighbours, and might well be regarded as a nuisance by the community as a whole, but it is at least a known factor that can be tolerated, provided it changes no further.

The intent of this group is therefore to prevent deleterious change. This conglomeration of interests sees university procedures – it knows little of specifics such as course accreditation – as a means of preservation, a protection against further risk by sustaining what is already there, rather than a launching pad for starting new adventures. Most universities, for their part, are aware of this feeling and remains anxious to address it – no one, either person or institution, seeks to be deliberately unpopular - provided the interests of itself and its regulators can be met at the same time.

This is done by the selective release of information. A university does not publicise everything that it does, much of which would be irrelevant if not meaningless to the community, and possibly misleading to regulators. What a university seeks to do is to create the most favourable image of itself in the minds of both – in the case of the community this is done through a sense of wonder as a university reveals its achievements to the world. In the case of regulators, it is done through compliance, as the institution shows itself to be a loyal and obedient citizen that fully deserves government support. As will be shown shortly, course accreditation is an area in which all of these things come together, possibly in harmony but sometimes in conflict.

### **2.3.4 Course Accreditation as an arena**

Course accreditation is one of the many areas in which these diverse interests compete. What eventually emerges is a compromise between the requirements of all three groupings, but at the same time compromise involves sacrifice, and to achieve consensus each of these parties must be prepared to surrender something that can only be released at high price. In the case of the university this involves a loss of autonomy, as the institution must consider the needs of others and can no longer do just what it chooses. In the case of society this requires an extension of trust – the community as a whole is not in a position to assess the value of what is offered and must take the word of the institution that it has in fact provided a faithful accounting for the things entrusted to it. In the case of regulators there is a surrender of control, often to a far greater extent than would be permitted in any other industry (compare to oversight of Aviation, for example, to the freedom allowed in Higher Education). The regulator remains responsible for the sector, but like the parent of a hoard of boisterous children must be prepared to allow them to run free provided they remain within the confines of the playground (Keskiw & Moir 1979).

The risks themselves cannot be surrendered – they exist as constant phantoms and must be accommodated – but the approach to these risks can be. One of the aims of the accreditation procedures of all Australian universities is to ensure that a moderation based on compromise (essentially a mutual sharing of risk) is achieved.

## **2.4 The role of University Governance**

### **2.4.1 The governance structure of Australian Universities**

Before the passing of the Tertiary Education Quality and Standards Agency Act in 2011, Australian universities (protected by their enabling legislation) operated nominally at arms-length from Government, although from the 1950s onwards the sector has found itself increasingly dependent on governments for funding and support (currently administered through the annually renewed Higher

Education Support Act 2005). This freedom of movement has been progressively reduced from 2011 by the need for tertiary institutions to maintain their place on the Commonwealth Register of Higher Education Providers and hence be subject to periodic inspections by TEQSA, with the threat of deregistration if found unsatisfactory (Davis 2017).

The history of Higher Education in Australia is long, complex, and political, but the organizational model that has been developed can be explained in a few words. The first Australian universities were modelled on the Scots university system but administered through the English *parish* structure, thus making themselves quite distinct from their counterparts in the mother country. [The Scots system – unlike the traditional Oxbridge universities – made the university rather than its affiliated colleges responsible for instruction, a situation made necessary by the absence of independent tutors in the Australian colonies. At the same time the Acts establishing the early universities – state based legislation that long preceded Federation – envisaged these institutions as being *administered* on the English (or more accurately the Irish) system of Higher Education, a model that had little in common with the academic based governance of Oxford or Cambridge, but which was normal practice in a benighted and backward Ireland and presumably applicable to a similarly degenerate Sydney or Melbourne. This model gave power to a committee of laymen (equivalent to a parish council) appointed by the Government who then delegated responsibility for academic and administrative affairs to a group of specialists. Under this model it was the “Council” or governing body rather than these specialists who remained answerable for the performance of the university. The administration on the other hand followed the structure of the state public service, and while serving the university was essentially under the control of the Colonial Secretary rather than the academic community or the Council (Forsyth 2014). This in turn provided three independent players, all of which were essential for the operation of a university but none of whom could take the place of the others].

This model was continued with the expansion of universities in the first and second half of the Twentieth Century, with all Australian universities (both public and private) being headed by a Governing Board or Council – known by various names – that had, in turn, delegated certain of its powers to a range of academic and administrative specialists. In the majority of universities, the body with delegated authority in academic matters was (and continues to be) known as the *Academic Board*, while the group to whom administrative authority has been delegated is known as the *Administration*. (While the actual titles of these bodies may vary from one institution to another, these terms will be used throughout this document for the sake of consistency). Course accreditation – in common with many higher education functions – involves the active co-operation of all three and a mutual sharing of risks.

#### **2.4.2 The concept of *shared governance* In Australian universities**

Australian universities operate on a model of *shared governance* that balances authority and responsibility between the Governing Body (generally known as the Council), the academic community (whose interests are represented by an Academic Board) and the university administration (sometimes called the Secretariat, although this name varies from institution to institution).

In the case of Australian Higher Education, shared governance represents the co-operative arrangement entered into for the mutual benefit of the institution between Councils, Academic Boards and Administration - none of whom can do the work of the other two (Harman & Treadgold 2007).

Shared Governance is the participation of administrators, faculty, staff and students in the decisions and policy making process to promote the institutional vision, mission, academic integrity and sustainability of the dynamic academic environment while retaining public accountability. *Advisory Council of Faculty Senates 2010*

Shared governance in Higher Education attempts to bridge the gap between Accountability (the University Council), Collegiality (Academic Board) and Bureaucracy (Administration) by placing a shared responsibility on all three partners for the performance of the other two (Goodman 2017). For this reason, it is impossible for one group in an Australian university to say “It’s none of our business – go and blame someone else” (Perlmutter 2011).

The fact that shared governance carries a shared responsibility becomes extremely important in risk management, as risk is something carried by the institution as a whole, not simply by one component of it (Pardo 2014).

#### **2.4.3 The relationship between shared governance, risk management, and course accreditation**

Shared governance attempts to smooth the relationship between risk and its consequences by ensuring that no decision can be made unilaterally by a single group (Lundquist 2015). This is particularly the case in course accreditation, where one group (Academic Board) endorses a proposal, another (the Administration) implements it, while the third (the University Council) takes responsibility for the conferring of degrees (Eckel 2000). This places a responsibility on all parties rather than one and is a feature of Australian Higher Education (Davis 2017).

Each group is responsible for a different type of risk, however. In the case of Academic Board, the risk is of an educational nature – the danger that what is taught will be inappropriate or inadequate, or that students will be given high marks while deemed unsatisfactory. Academic Boards take no responsibility for systems or commercial failure, nor are they responsible for resources. Their role is solely confined to academic matters, yet they share the risks of the academy with all others.

The Administration makes no contribution towards the academic content of programs. Its role is one of coordination and support rather than teaching and research. In the case of the Governing Body its role is none of these, but rather to act as an interface between the university and its sponsors by providing sound governance and careful stewardship.

Despite this, all three share an equal responsibility for risk, an issue that affects all aspects of their operation, including course accreditation. Higher Education is unusual in this regard as in most non-academic organizations those who take risks retain the responsibility for them. In the case of Higher Education risks are shared across the institution, whether those on whom these risks are laid were party to the original decision or not, thus reducing the liability of individuals at the expense of the group (Valeikiene 2017). This mutual agreement to share the risks requires limitation lest it be abused, and this in turn sets the tasks allocated to each group within the academy.

#### **2.4.4 The tasks delegated to Academic Boards**

In virtually all Australian universities, the authority to approve the content of new course proposals has been delegated by Governing Bodies to the institution’s Academic Board, while the nomenclature of the award, its registration with Canberra and the admission of successful graduates to the qualification remains the responsibility of the University Council. This has important implications for risk management as will be explained shortly.

The *Responsibility Statement* for the Academic Board at James Cook University (2017) is typical of what is expected by the majority of universities.

In relation to academic quality, the Academic Board, under the direction of the Chair, assumes overall responsibility for effective academic governance within the University to:

- Provide a lead role in academic governance and uphold the functions and roles of Academic Board in accordance with the Charter;
- Lead in the development, maintain oversight of the review and, monitor the impact of academic delegations, integrated academic policies and procedures in areas such as student performance, learning and teaching and research;
- Monitor and protect the academic integrity of the student experience by ensuring that policies, procedures and processes are current and adequate;
- Contribute to the development and review of the University Plan's academic components;
- Monitor effectiveness and identify academic skills and mentoring gaps in academic staff professional development strategies (including academic promotions);
- Oversee staff and student academic integrity (academic misconduct, appeals and complaints);
- Maintain academic quality assurance oversight of the University's academic operation improvements and proposed educational innovations by the critical evaluation of proposal's quality and effectiveness;
- Ensure the quality of each course of study leading to a higher education award;
- Maintain oversight of academic and research integrity, including the monitoring of potential risks;
- Monitor and initiate action to improve performance against institutional benchmarks for academic quality and outcomes;
- Evaluate the effectiveness of institutional monitoring, review and improvement of academic activities;
- Review the Academic Board's operations and effectiveness (cyclical external reviews).
- Assure compliance of all courses to relevant regulatory frameworks and adhere to the Higher Education Threshold Standards (section 5) by critically scrutinising, approving and accrediting courses of study and their associated qualifications;
- Ensure research activities adhere to the *Australian Code for the Responsible Conduct of Research*
- Prepare and maintain the Charter of Responsibilities for Academic Governance (annual review)

*James Cook University 2017*

While this is an impressive list of responsibilities, it is important to note the things that are excluded. The Academic Board at James Cook University (in common with virtually all Australian Academic Boards) has no responsibility for finance or spending, nor (apart from minor matters of academic adjustment) for the strategic management of the institution. It also has little responsibility for the welfare of students, or the communication with sponsors or peers.

Even more importantly, while the vast majority of academic boards have a duty to identify risk (as in the terms of reference given above) they have little responsibility for risk avoidance once detected. Academic Boards have little involvement with operational matters, and the matter of risk *after an activity is approved* is almost always devolved to other areas of the university, usually the faculty or the administration.

This abjuration may seem surprising in view of the insistence of TEQSA on the responsibility of all parts of an institution for the effective management of risk (TEQSA 2015) (TEQSA 2017) but may perhaps be attributed to the infrequency of formal meetings of Academic Boards and the lack of authority by the Chairs of these bodies to intervene in other areas (Dooly 2005). As a general principle no university wants its academic board to become too powerful as this can distort the balance between academics, administrators and management (Bessant 2002) and this restraint is normally imposed by restricting its power to those occasions when it is in session, with this authority falling into abeyance once meetings conclude (Victorian Department of Education and Training 2002). While the Chairs of Academic Board may seek to go beyond this, and request changes – or more commonly to insist that standard policy and procedures are followed – but this is limited to persuasion rather than authority during the proroguing of the Board. The same applies to the committees of this body, including those involved with course accreditation. As will be explained in Chapter 7, this has a number of implications for the risk management on course approval procedures, as while academic boards may set these procedures and reject proposals that fail to conform they may not have the power to monitor every aspects of the procedure through which this is done (Bostock 2002) and unless controlled this may allow many things to slip through the cracks if undetected]

This limitation on the power of Academic Boards is made plain in the terms of reference for the Chair of this body at Sydney University (although something similar is found in most Australian universities, particularly where the Chair is released from teaching and other administrative duties for their term of office, and if unrestrained might have the time and opportunity to intervene in the function of others).

The University of Sydney (Academic Board) Rule 2017 defines the role of the Chair of Academic Board as follows;

#### 4.1 Chair

- (1) The Chair of Academic Board is responsible for;
  - (a) Managing and supervising the functions and business of the Academic Board
  - (b) Facilitating communications between the academic community of the University, the University Executive and Senate
  - (c) Subject to delegations of authority by Senate and resolutions of the Academic Board, apportioning authority for carrying out the Academic Board's functions to other members of the Academic Board
  - (d) Reporting to Senate on behalf of the Academic Board, as required by this rule or any request of Senate

*[University of Sydney 2017]*

There is no mention here of any responsibility for the oversight of administrative functions, or of those course accreditation procedures not immediately associated with Academic Board.

It would seem that this anomaly is of concern to TEQSA as well. The TEQSA Guidance Note on Academic Governance (Version 2.3, 11<sup>th</sup> October 2017) states

## Risks to Quality

The concern of the academic governance Standards, and of TEQSA, is that a provider's higher education activities are reputable, of high quality, comply with institutional policy requirements, deliver expected outcomes for students and that all qualifications awarded are credible for the level of qualification involved. An effective and robust system of academic governance is an essential component of every higher education provider's overarching governance structures and processes. The system provides the framework for establishing, monitoring and sustaining quality and integrity in higher education provision, and ensuring quality learning experiences and outcomes for students.

In the absence of a competent system of academic governance it is difficult or impossible for a provider to assure itself of the quality of its educational activities and to provide institutional academic leadership (e.g. through setting benchmarks, policy frameworks, scrutinising and approving courses of study, ensuring the meaningfulness of academic grades, determining admission requirements). This will inevitably lead to poor outcomes for students and consequent damage to the reputation of higher education.

An inadequate policy framework also leads to unclear expectations and requirements for both staff and students with predictable consequences, such as inconsistencies in student experiences and drifting quality of processes and outcomes that should be consistent, such as the credibility of qualifications awarded. Inappropriate corporate decision making may result from insufficient or incompetent academic advice or a lack of awareness of academic issues (e.g. if the governing body makes academic decisions without sufficient academic input), with attendant risks to students and corporate/reputational risks. Insufficient vigilance and monitoring of academic and research integrity will inevitably lead to some lapses, with likely reputational fall out for the provider and/or the Australian higher education sector. The academic governance system also provides a locus of ownership for reviews of:

- courses
- institutional benchmarks
- academic achievement, and
- quality assurance arrangements.

[TEQSA 2017b]

To date, however, little appears to have been done to enforce this requirement in self-accrediting providers.

### 2.4.5 Responsibility for the completion of these tasks

But if Academic Boards lack this authority, where does the responsibility for the recognition of risk in course approval lie? The majority of Australian universities have an Audit and Risk Committee, as a sub-committee of Council, which was initially (and is still primarily) responsible for financial risk, with members predominant in fiscal and accounting skills but, in the absence of alternative groups at a senior level, these committees have tended to assume responsibility by default for risk in all its forms across the university. Thus, in most Australian universities the Audit and Risk Committee advises the governing body on risks to reputation and integrity as well as risks to its bottom line and the accountability of staff. This has the interesting effect of making most governing bodies more conscious of the financial rather than the moral aspects of risk, particularly in research (Baccarini & Melville 2011). [*The potential for damage to reputation through research, particularly the falsification of data, is much greater than a failure to deliver the best possible teaching (Stroebe, Postmes & Spears 2012)*] This emphasis on finance and reputational risk may in turn conflict with Academic Boards which, with no responsibility for finance or administration – or research for that

matter - can concentrate on the social and communal aspects of risk (TEQSA Guidance Note – Academic Integrity 2017) (TEQSA 2017 f).

In an attempt to avoid further conflict the vast majority of Australian universities try to distinguish clearly between *risk* and *compliance*, stressing that the identification of risk is the responsibility of the governing body while compliance (the avoidance of risk once identified) is essentially the task of the Administration - those responsible for implementing rather than approving or supervising an activity. This leaves Academic Boards in limbo as these bodies have little control over the administrative apparatus of a university and hence, once courses are approved, are unable to enforce compliance with the relevant legislation or community expectations. The most that Academic Boards can do is to endorse procedures – the implementation of these procedures, however, rests in the hands of others.

This leads to an important dichotomy in most universities, where risk deals with those matters that are foreseeable, but over which the university has little control (such as a change in government policy) while compliance reflects those factors that can be handled through prudent management, such as satisfying the requirements of all relevant legislation or the submission of returns in a timely manner. For this reason, the management of compliance tends to be handled by Directors of Quality (often with the assistance of the university's legal unit) rather than by Directors of Risk, who in most universities deal predominantly with financial threats and menaces to reputation.

The distinction between *risk* and *compliance* sometimes causes confusion in the documentation, depending on its source. Most of the factors that TEQSA lists as risks are in fact related to compliance rather than academic perils. (All TEQSA instructions are essentially administrative rather than academic even if addressed to the so called academic community. TEQSA, for example, would not attempt to tell staff how to teach. Its emphasis is on administrative practice, and that basically to achieve uniformity across the sector) (TEQSA 2017b). At the same time this does not prevent TEQSA and other regulators saying a great deal about risks, but the implication here is that the word implies risk to the Commonwealth or risk to the sector, rather than an attempt to save institutions from themselves. This use of terminology is replicated in turn by the universities (Prisacariu & Shah 2016) and may mislead investigators.

It may be significant that only a few Australian universities have linked risk with compliance, particularly in course accreditation and other administrative operations. One example is Victoria University which has a Compliance, Audit and Risk Committee reporting to Council, although, even here, the dominant element is finance. The terms of reference of this committee (2017) require it to:

3.2.1 To review and assess the adequacy and compliance of the University's policies and procedures for identifying, assessing and managing risks (financial, legal, ethical, safety, reputational or other). **For the purposes of this paragraph, 'risk' is defined as any circumstance that may prevent the University from achieving its objectives.** [Bold type added]

[Victoria University 2017]

(This definition of risk is possibly the clearest statement of any Australian university of what the term embraces, although the definition of Risk in the *University of Adelaide Risk Management Handbook* (2017) while similar, is more detailed.)

#### 2.4.6 Risk management in the context of Higher Education governance

Risk management is only one aspect of Higher Education governance, albeit of growing importance in the context of external regulation (King 2007). The influence of regulators has meant that risk

management is often envisaged by Australian universities as an extension of governance, and hence as a means of control rather than a vehicle for improvement (Coates 2010).

For this reason, formal risk management in Australian universities tends to be externally rather than internally driven, almost certainly due to the influence of regulators (Baird 2014). Beneath the surface, however, there is the presence of a more influential informal risk management framework that arises from the grass roots rather than senior management. This has been created by the need for staff solidarity as well as job security (McKinnon, Walker and Davis 2000). The presence of this informal network creates a potential for tension, and this comes to the fore in course accreditation particularly where the threat to colleagues is greater than the harm that could come to the institution (Horton 2016).

The tension between formal and informal risk management can be used to explain a number of factors in course accreditation, including the attitude of senior management versus that of academic boards and administrative bodies. Course accreditation procedures are designed to protect the institution (and hence senior management) (Australian Government 2015). Their implementation, however, rests with staff, who may well have a different agenda and who wish to protect themselves rather than the institution. (Cassidy, Goldstein, Johnson, Mattie, & Morley, 2014).

## **2.5 Course Accreditation as an Exercise in Governance and Risk Management**

Australian universities without exception lay claim to the quest for *quality* as a justification for most their activities including course accreditation, although few define what this term might mean. This is unfortunate, as the word “Quality” may well lead to confusion (Harvey 2006). Despite this, the word is frequently construed to imply a *fitness for purpose* that would justify whatever motive students may have for undertaking a course of study (or any other university activity), and this is the sense in which it has been used in this document.

There is little mention in the material provided by the universities of the internal benefits that accreditation is intended to produce, such as forward planning, cost control, competitive advantage or the maintenance of reputation, and it is hypothesised that most published course accreditation procedures are intended for an external rather than an internal audience – an audience believed in this case to be regulators and the public.

This is supported by the often significant differences found between the expressions contained in policy, and the templates provided for the use of staff. It would seem that the former are for the use of an external readership while the latter are for those engaged in the process. There is, for example, little mention in policy of the need for cost recovery – other than the fact that a business plan must be provided with the submission. Far more is said about business plans in procedural documentation with most universities explaining in great detail the information required. This may be due to the fact that policy reflects the formal risk management of the institution (and is intended for external consumption) while procedure reflects its less formal counterpart that depends more on the informal risk management network within the institution and is intended solely for those within its walls

### **2.5.1 What the universities claim to be seeking from course accreditation**

It is difficult to provide a complete synthesis of all that Australian universities claim to be seeking from their accreditation procedures due to the variety of documentation. It would appear, however, that there are five points in common across all institutions:

- Universities seem to feel a constant need to maintain the confidence of the public and regulators by assuring both that course proposals are examined effectively by appropriate authorities, both within and outside the university, and that nothing will be offered without an appropriate review by peers.

- Universities also feel a need to maintain standing within the discipline and the sector by ensuring that their courses are of an appropriate depth and rigour. This is normally done by strict adherence to the requirements of the Australian Qualifications Framework (AQF) and by comparing what is proposed to the offerings in a similar discipline and level by other institutions.
- Universities need to assure potential applicants that the content of what is offered has been checked as relevant and current, and that the outcome they might be seeking – which may differ greatly from one student to another – remains achievable. This is essentially a marketing activity, and is usually done by reminding outsiders of the history, reliability and achievements of the university (as well as stressing the rigor of the approvals process) even if these other things bear little relationship to the course itself.
- Universities need to assure sponsors and stakeholders (the principal sponsor being the Commonwealth Government) that the institution has the capacity to discharge its responsibilities. No one is inclined to enrol in a course that is likely to be terminated through malpractice, nor do funding authorities appreciate a misappropriation of their money. This assurance is provided by showing that all course proposals pass through a rigorous financial review.
- There is a constant need to satisfy existing staff and students that no one will be disadvantaged through the introduction of the new course. This can arise through a fear that a new proposal will drain resources from existing programs, will receive more favoured treatment (and hence higher priority) as a “favoured child”, or that graduates from a discontinued award will be “orphaned” through the closure of their now obviously obsolete degree. This reassurance is provided through sound communication with all affected parties and the greatest transparency in procedures to approve the newcomer.

CLAIM	DESCRIPTION
Maintain public confidence	Reassuring the public and regulators that procedures are in place for an effective peer review of proposals
Retain academic standing within the profession	Ensuring compatibility with programs offered elsewhere through strict adherence to the requirements of the Australian Qualification Framework
Attract students by virtues of the value of the course	Assuring potential applicants that steps have been taken to ensure that the outcomes sought will be achieved
Retain the support of benefactors, sponsors and funding bodies	Showing that all non-academic issues (particularly fiscal and reputational risks) have been addressed, that the course is worthy of support, and – as demonstrated through the thoroughness of the process – will be appropriately managed
Reassuring current stakeholders (staff, students & community) that their interest will be safeguarded	Maintaining transparency of the process through effective communication (the interest of stakeholders must not simply be maintained, but must be seen to be maintained, whether these persons are directly involved or not).

**Figure 2.1 What the Universities claim to be seeking from Course Accreditation**  
(consolidated by the researcher from information provided by the universities)

There is a risk associated with each of these objectives which all institutions seek to minimise, and the cost is high (Turk 2008) as the approval of a new program is always the result of compromise, with many potential losers and only a few beneficiaries (University of the Sunshine Coast 2017, which also states quite specifically that “*The University separates academic quality assurance of its curriculum from the managerial decisions regarding the development and offering of that curriculum*”). How this separation is achieved and compromise initiated will be discussed at greater length in Chapter 7.

### 2.5.2 Overview of the governance of course accreditation in Australian universities

While the accreditation process will be described in detail in later chapters, the flowchart on the following page gives a summary of accreditation procedures in the majority of Australian universities.

In Australia, course accreditation is essentially a three-stage process. Each stage involves a different approach to risk management and a different level of risk acceptance. As will be explained in Chapters 4 and 5, all three have a different impact on course accreditation procedures.

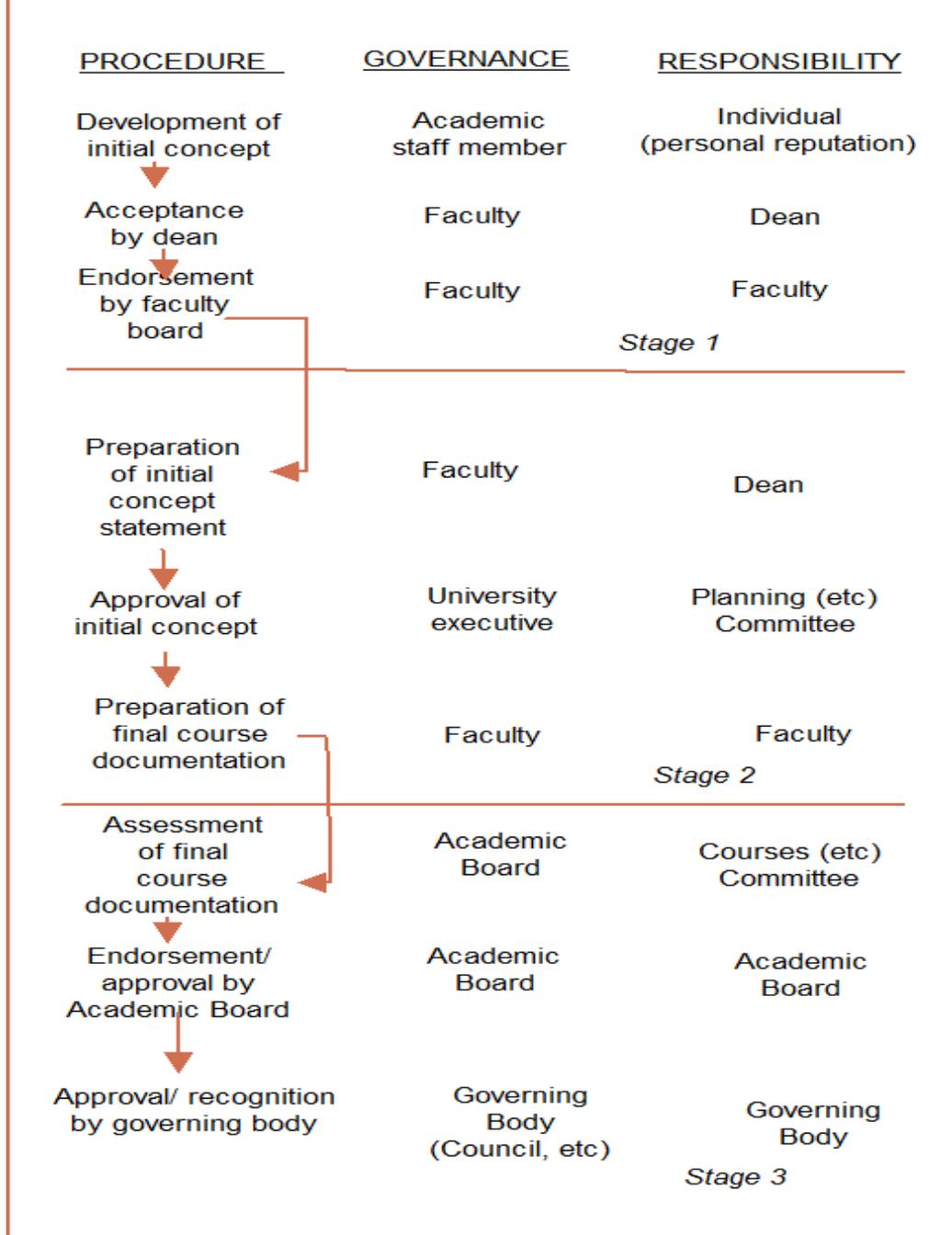
In the first stage (from the initial concept to the development of the *initial course proposal*) the governance (and hence, the control of risk) lies completely within the faculty or equivalent academic unit, and it is this body that carries the responsibility for failure. From the moment of conception, the risk rests with the individual (the course developer or course development committee), and then once accepted by the faculty, with the Dean in signing off the proposal in the name of the faculty board.

In the second stage (from the submission of the initial course proposal by the faculty to the submission of the final course documentation) the governance is in the hands of the university executive, who accept all risks to reputation and agree to make funds and other resources available should the proposal be approved. **This second stage is essentially an acceptance of the non-**

**academic risks associated with the** proposal and is a measure of the danger to which the university and its management is exposed. The threat to the reputation of the organization through association with an ill assessed proposal suggests both lack of competence and managerial ineptitude.

The third stage (from the assessment of the final documentation to its endorsement by Academic Board and its acceptance by the institution's governing body) places the governance in the hands of Academic Board and represents **an acceptance of all academic risks associated with the program.** This in itself presents considerable risk, with a danger that should the proposal prove unacceptable to peers in the academic community it will damage the personal reputation of the individuals involved

## GOVERNANCE OF COURSE ACCREDITATION IN AUSTRALIAN UNIVERSITIES



**Figure 2.2 Governance of Course Accreditation in Australian Universities**

[Drawn as a consolidated and generalised summary from the information supplied by the universities in their course approval procedure documentation]

## 2.6 The role of Course Accreditation Committees

### 2.6.1 The responsibilities of accreditation committees

One of the key players in the course accreditation process is the course accreditation committee. Academic boards normally lack the time or resources to examine course proposals at an appropriate depth during their meetings and to assist and advise them, have universally appoint a specialist committee, which may be known by various names depending on the institution, but throughout this document will be called the *Course Accreditation Committee*.

The terms of reference of these committees – and hence their range of responsibilities – vary greatly, but at a minimum these bodies are required to examine proposals for all new courses and (usually) subjects (not all universities require subjects to be approved by academic board) and to make an appropriate recommendation in the light of circumstances, usually by comparison against courses offered elsewhere and the input of external advisers. They are also required to ensure that each proposal falls within the requirements of the appropriate band of the AQF (Australian Qualifications Framework) and that all legal and policy issues have been addressed. (Essentially their role is that of acting as gatekeeper to academic board, keeping out the unworthy and making certain that only those deemed “fit for purpose” pass through, although additional duties may be imposed depending on the institution.)

### 2.6.2 The composition of accreditation committees

While the composition of Course Accreditation Committees varies from one university to another, there are generally three types of members:

- Ex officio members, whose presence depends on the position held within the institution. While most administrative members of these committees hold their place in an ex officio basis – and are required to withdraw if promoted or if appointed elsewhere – other ex officio members may include representatives of senior management, the Chair of Academic Board, the Deputy Vice Chancellor or the Chair of the Teaching and Learning Committee
- Elected or appointed members who hold their position on the basis of their personal knowledge, experience or expertise (The majority of academic members on these committees fall within this group)
- Representatives of various groups, interests or offices within the university, such as the International Office, the Indigenous Unit, Student Services and the student body.

In addition to that, Course Accreditation Committees may have additional (and generally non-voting) advisors or observers, (such as the Legal Unit, or various branches of the administration) whose task is to support the committee through their expertise.

### 2.6.3 Support for accreditation committees

The majority of Course Accreditation Committees have the right (although not necessarily the obligation) to seek external advice or support, both within and beyond the university. This may include consultation with professional bodies, regulators, external advisory committees and staff from other universities or research centres. As a general rule these support persons can provide advice only and have no voting rights or powers of veto, nor is the university obliged to follow any advice that they might offer. (Most universities, however, require course accreditation committees to justify their action if this occurs)

The meetings of course accreditation committees in virtually all Australian universities are nominally open to visitors from within the institution (but not to outsiders) by permission of the Chair, although in most cases few attend apart from those invited to answer questions. (Informant 24 suggested that the reason lay in the fact that administrative staff needed the permission of their supervisors, which at time of heavy workload could not be given, while academics simply didn't have the time). Despite this lack of attendance, access to these committees is considered an important part of maintaining the transparency of operations, with few universities requiring its accreditation committee to meet behind closed doors. On the other hand, the question of whether these visitors should have a right to speak (other than in response to questions) was at the discretion of the Chair, and if dissention occurred they could be excluded.

Most course accreditation committees are supported by the institution's secretariat who keep the minutes and supply the agenda. Where a specialised office has been created to service the course approvals process (as in the case of the Academic Programs Office at UTS) this body is more likely to fulfil this function.

Most course accreditation committees meet from six to eight times each year, generally a short time before the next scheduled meeting of academic board (which may not meet that frequently) although at time of high demand the number of meetings may be increased to reduce the workload.

#### **2.6.4 Course Accreditation Committees and risk management**

While risk management in Course Accreditation will be discussed in greater depth in Chapter 4, it may be sufficient to state that there are two types of risk in course accreditation – *general risk* and *academic risk*. General risk is normally handled in the initial concept stage, and once past is rarely revisited. For this reason, course accreditation committees tend to be responsible for academic risk only, and there are few exceptions to this. The most notable concerns compliance (such as checking that nothing in a proposal – such as the admission requirements - is against institutional policy, and that the document is clear and complete). Proposals are rarely declined and in the vast majority of cases a decision is simply “deferred pending amendment” if a document is deemed unsatisfactory.

### **2.7 Course Accreditation as an Instrument of Power and Control**

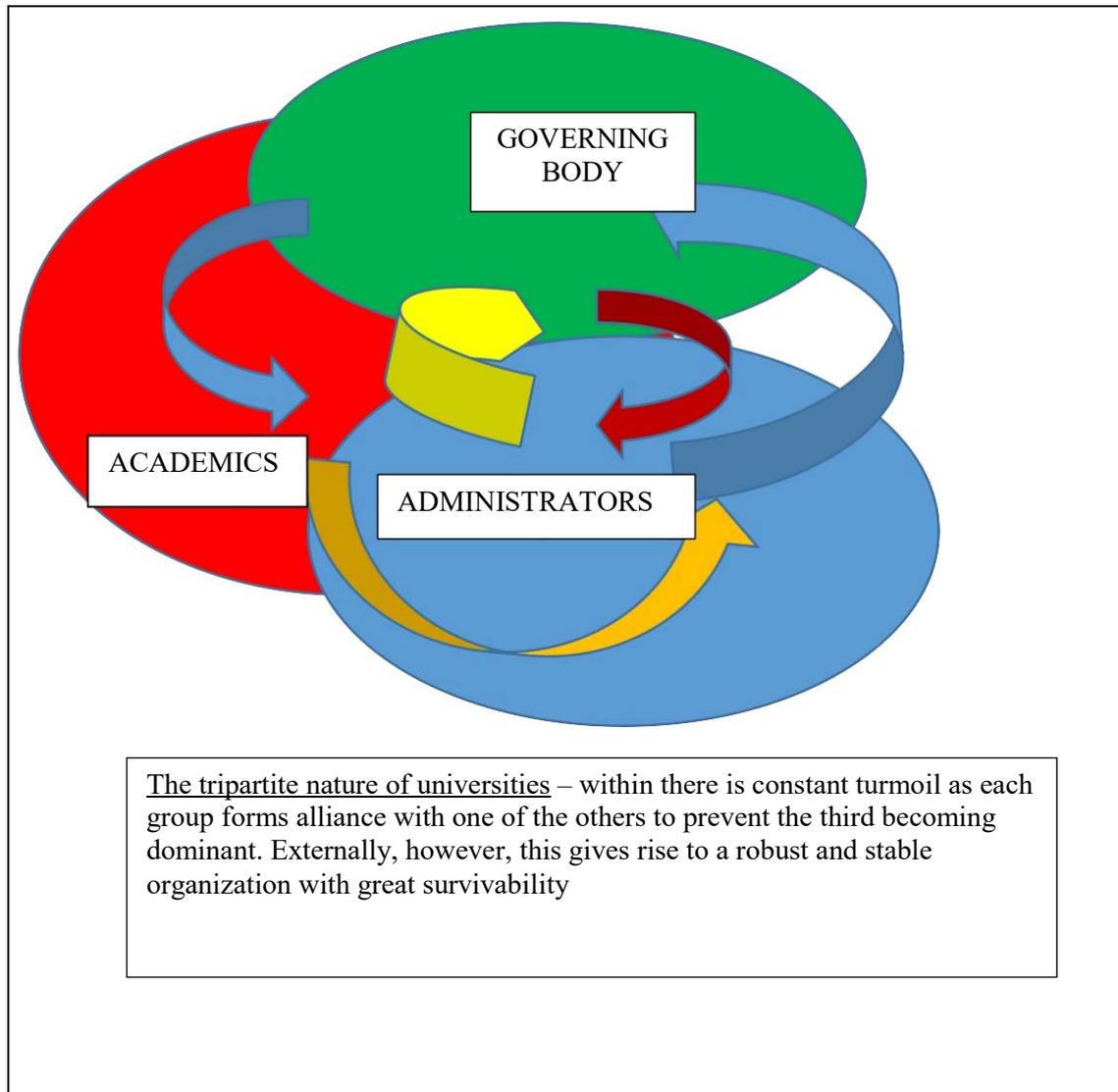
Unless a university chooses to confine itself solely to research (which it cannot do in Australia if it wishes to retain the name “University” – TEQSA 2017b) there must be a procedure for the accreditation of courses. It follows therefore that those who control this process are in a position to exert great power over the institution, as without an effective system to approve new and amended course proposals a university is unable to function.

Australian universities follow a tripartite organizational model in which power is shared mutually between three groups – the governing body, the academic community, and the administration, with each constantly entering into alliance with one (and only one) of the others to ensure that the third can never achieve dominance over the institution (European University Institute 2017). This structure promotes constant internal turmoil but gives great external stability in battles with the outside world and may be one of the reasons why the Higher Education System – possibly one of the last relics of the medieval era outside the Church – has survived so long (Lang 2014).

An understanding of the tripartite nature of universities gives great insight into many aspects of tertiary operations and management (Bess & Dee 2008) - including the power relationships within the course accreditation process - but may cause distraction if explained in detail here. For this reason, a more thorough explanation of this structural model has been provided as an appendix. (Appendix **D**)

What is more important as this chapter is concluded are the implications of this structure, which will be referred to again in Chapters 7 and 8. Course accreditation is one of the many areas in which all

three parts of a university must work together – even if for no other reason than the inability of the other two can do the work of the third - as without joint cooperation all must fail (Neumann 2012)



**Figure 2.3 The Tripartite Nature of Universities**

For this reason course accreditation should be seen as both a skirmish and a coalition between the three components of a university, as each battles to establish its empire (with its own agenda, its own priorities, and its own fears and risks) but which it can never achieve as the others will always combine to prevent this happening, a point so frequently reflected in institutional politics as well as procedures (Bess 1982).

As will be explained in the Methodology Chapter (Chapter 5) it was necessary to examine all 40 Australian universities to see which group had claimed a temporary dominance (and by default which groups were conspiring to reverse this) in each institution before the power and control behind the accreditation procedures of that body could be fully understood.

## **2.8 Summary**

Australian universities have the right to the self-accreditation of their courses, but this brings with it a responsibility for prudent management and careful foresight, irrespective of internal dissent, backstabbing and subtle pressure. Before this can be appreciated, however, it is necessary to consider the whole question of Risk, as it occurs and as it is handled in Australian Higher Education.

## Chapter 3 Risk Management Theory

*This chapter discusses the theory of Risk as perceived by Australian Higher Education organizations. Chapter 4 will continue this theme and explain how Risk is managed by Australian universities*

### 3.1 Risk Management Concepts

It is impossible to consider the influence of Risk on the course accreditation procedures of Australian universities without first considering what may be meant by that term. Australian universities – in common with all trades and professions - have developed their own terminology, and many of the expressions used in the sector may have a slightly different (and often narrower) meaning to their use in daily life.

The word “Risk” is a typical example. The term carries numerous overtones when used in Higher Education and it is hard to explain what is meant by those who use it without a careful examination of the context in which it occurs (Undrill 2007). For the purpose of this document, however, risk will be defined as any threat that is likely to cause disruption to a planned activity (a definition endorsed by ENISA 2017). The assumption underlying this statement is that stability, predictability and the attainment of goals are the aim of every university, and that anything that may hinder, frustrate or prevent this must be avoided. Threats may be known and foreseeable, or they may be hidden and concealed, but the overriding premise is that they must be averted if at all possible, or if this proves impractical, the ill effects that might be caused through their occurrence must be minimised. The strategy through which this is achieved is known by the generic name of *Risk Management*, a term which also may mean different things to different individuals depending on the circumstances (Sjoberg, Moen & Rundmo 2004).

It is impossible to avoid risk, and even those who are risk adverse are normally willing to accept some exposure to this bogymen, provided its probability and consequences can be more than counter-balanced by the benefits to be derived (Dyer & Sarin 2012). This is particularly the case in Higher Education where advancement is only achieved by taking risks, and where the institution that fails to take risks becomes irrelevant and quickly dies (Zinn 2017).

There is, however, a difference between “Risk-Taking” and “Foolishness”. Risk-taking assumes a calculated forethought, while foolishness involves no forethought whatsoever (Singh 2017). Risk-takers (unlike the foolish) think before they act and make a conscious decision with deliberate action, even if risk is nothing more than a mental construct based on knowledge and past experience. As such risk to these people becomes an intensely personal matter, developed on a balance of probabilities in anticipation of outcomes that may never eventuate (Sadgrove 2015).

At the same time if risk is nothing more than a mental concept (“Risk has no existence beyond the human brain” – Crawford Brown 1999) it should be seen as the product of an informed imagination and hence as a system based on ontological probability – in other words a system of anticipation based on one’s (always imperfectly) assumed knowledge of the possibility that the event foreseen may occur (Lindley 2006). If, on the other hand, risk is seen as an objective phenomenon external to the human mind (and thus capable of quantification, comparison and statistical analysis, as claimed by many planners and actuaries, such as Birch et al.(2018)) it should be seen as an epistemological probability, a measured degree of possibility based as far as possible on hard and objective evidence rather than one’s personal imagination. Both approaches occur in Higher Education, with academics tending if anything towards ontological probability, while administrators and managers (who perhaps have less trust in imagination than their academic counterparts) tending towards an epistemological probability based on data and objectivity (Klinksiek 2016).

Nor is this simply a play on words, as the approach one takes to risk will normally determine one’s mode of risk management (Kendrick 2015). If a person considers risk from the perspective of

ontological probability it becomes personal in focus as it originates in their mind – in other words, what will this threat do to me, and how can I avoid it; with the question revolving around the intuition (or gut feeling) of the person who asks it. If one approaches risk from the position of epistemological probability it tends to become analytical and quantified as well as depersonalised, and it is no longer a question of what risk might do to me, but rather, what harm could occur in an Olympian manner to the world that we look down upon, and what evidence do we have for this?

In theory, most universities approach risk from an epistemological probability position, viewing it as a depersonalised abstract entity that can have little effect on the incumbents or decision makers. In reality most risk-takers – those responsible for taking action based on risk – view it as an exercise in ontological probability and may well take it personally (Carter, Jarvis, & Rubib 2016)

### 3.1.1 Definitions of risk in general

While there is no universal definition for *risk* there are certain commonalities that occur across its usage that enable boundaries to be defined (Conrow 2003). Risk involves (from Bernstein 1998):

- An uncertainty of advent. (While the potential for risk may be foreseen this does not guarantee its occurrence, nor does it give any indication of when it might occur, or its frequency, duration and severity)
- An uncertainty of consequence (It is normally impossible to predict the extent of consequence should a risk transpire, as this includes collateral damage as well as immediate harm.
- An uncertainty of identification. (It is often impossible to be certain of the reality of the threat, particularly if risk – as suggested elsewhere in this chapter – has no actuality in itself but is simply a mental construct in the mind of the risk-taker)
- An uncertainty of avoidance. (It is impossible to be certain that the strategies adopted once a risk has been identified will enable that risk to be avoided or moderated)
- An assumption of awareness (An awareness of all other factors that could come into play that might magnify or diminish the possibility of risk or its consequence. Again, this is a function of human cognition in anticipation – Hillson & Murray-Davis 2007)
- Sufficient motivation to do something about it. (A risk to which one is indifferent is hardly a serious risk – Moran 2003)

For this reason, most risk management involves hoping for the best but planning – and being prepared for - the worst possible outcome (Carter & Jackson 1992).

In working through the risk management documentation produced by universities it should be noted that the word *risk* may be used as a noun, a verb, or as a noun replacement adjective, and this in turn exerts a subtle influence on its meaning. When used as a noun, the term suggests that risk is something that is independent of the commentator, and hence beyond their immediate control (i.e. “What is the risk of rain?”). Thus, the user remains an observer of risk rather than a participant. When used as a verb, the word suggests the opposite – that risk lies within the control of the user who can exploit it (or choose to ignore it) as they see fit (i.e. “Will we risk not taking an umbrella?”) When used as a noun replacement adjective, as in the familiar expression “risk management”, it implies that risk is basically an artificial construct that can be manipulated (similar to a mathematical change in variables) by the word to which it is coupled, and as such has less power of its own to do harm (Ardivsson & Cedergren 2017).

The context within which the word occurs also affects its meaning. When risk is used as the subject of a sentence the implication is that it is dominant, and hence the speaker has little control over it. (i.e.

“There is great risk that...”). When used as the object of a verb, however, the intent of one’s mental lexicon is to convey the assumption is that risk is both manageable and controllable (i.e. “Our auditors are responsible for risk”) [taken largely from Rosenbloom 1972]. The deep structure underlying the various forms of risk documentation produced by universities is important for an understanding of this material but discussion of this issue will be postponed until Chapter 6.

### 3.1.1.1 Risk within not-for-profit organisations

Not-for-profit organisations (a group that includes universities and other charities) are essentially mission-driven and, while not expected to make a return on investment, are still required to show effective stewardship of everything that has been entrusted to them, and to remain faithful to their vision in every aspect of their operation. The risk of non-fulfilment is compounded when the mission of a not-for profit organization (such as a university) is vague, multifaceted or ill defined (Strain, Barnett & Jarvis 2009).

As fiscal responsibility is one of the few items easily checked by those assessing the stewardship of not for profit organizations, it is frequently used as an indicator of the competence of management, and often the general health of the institution (Australian Institute of Company Directors 2017). Thus, a failure in finances (or an inability to account for funds expended) is effectively a reflection on the quality of the body as well as its administration and presents a risk that no responsible group can afford (Greer & Horst 2014). For this reason, almost all risk in Business – whether it be *for profit* or *not for profit* - tends to be focused on the endangered *bottom line* as opposed to the other outcomes from the company (Breyer 1993). This presents a source of constant tension for Higher Education providers, particularly if the governing body stresses the protection of the institution as a whole, while the academic and administrative community place greater emphasis on the welfare of the individual. (Helsloot, Vlagsma & Karrijenbrink 2017).

Thus, how should one judge a university? Most external assessors – the question of whether this includes TEQSA is left to one side for the moment - tend to apply a “League Table” approach and use those things that are measurable and countable (the number of graduates, the number of publications, and so on). Most internal assessors – and this includes the managers of institutions – stress those things that are less easily measured, such as character development, the application of knowledge, and the ability to perform effectively in a cynical and cruel world (Ruscio 2010). This causes numerous complications when the time comes to assess the management of risk by Higher Education providers, and the question of whether it should be viewed from the inside or the out.

### 3.1.1.2 Risk within society

Society takes a different view on risk from business although it is important to distinguish between the perception of risk by society and *social risk*. The first deals with the potential harm to individuals while the second – which is often overlooked by the common person - reflects the consequences for the community (Mares 2003). [Thus, should the mentally impaired be placed in asylums? and so on]

Society tends to view risk as harm to the individual rather than harm to the community (Levin, Trickett & Hess 1990). While thinkers may concede that there are numerous threats that could affect humanity as a whole (such as global warming or nuclear war) these are always presented as dangers to the individual rather than a menace to the group – possibly because people take greater notice when something affects them personally (Brueggemann 2013).

This has an interesting effect on universities. While most universities acknowledge the risk that participation in their programs may present to individuals, (as in the numerous safety and workplace health posters that adorn many classrooms) this is purely incidental to their core business, which is not to prepare students to face risk in laboratories or lecture theatres, but to enable graduates to practice a profession. (Alexander 1931). Universities focus instead on the social risk inherent in their activities, over and above the threats faced by those immediately in their care, and place emphasis on

the consequences of their work for their dealings with the community rather than individuals (Baker & Brown 2007).

This has three effects: (Taken with expansion from Wilson & Corr 2018))

- Universities tend to be unwilling to risk social repudiation, even if this carries no financial penalty (as in the case of the *land grant* universities where funding comes from the ownership of property rather than governments or philanthropists) as the university depends on the community for its students and the ultimate employment of graduates (Barcan 2013)
- As a general rule, universities prefer to offer what society has encouraged them to deliver rather than what students or the discipline may necessarily require (Ackoff & Greenberg 2008). Thus, certain factors, such as environmentalism or gender equality, are stressed throughout the curriculum as evidence of “responsibility” on the part of the university, while others, such as efficiency, exploitation or profitability – while equally valid within the curriculum - are played down as socially unacceptable (Purcell 2008)
- In dealing with regulators, most universities prefer to stress the social rather than the political, economic or personal benefits they provide (King 2004). This in turn influences many of the references to risk in university documentation, where the institution would prefer to be seen as a good corporate citizen rather than a harsh (but realistic and necessary) schoolmaster (Ramos-Monge, Audet & Barrena-Martinez 2017).

As will be explained in Chapter 7, all three of these factors become significant in the risk management of course accreditation.

#### 3.1.1.3 Risk within the academy

The attitude towards risk within the academy is slightly different from its equivalent in society. As foreshadowed in 3.1 above, while the governing body tends to be more conscious of social rather than personal risk (particularly the threat to the reputation of the institution rather than themselves), those occupying positions elsewhere in the institution tend to view risk more personally, particularly the threat to employment, career prospects and their own standing – as opposed to any harm coming to the institution. (Trowler 2008).

This has five consequences:

- There is often significant tension between the benefits available to the institution and those open to the individual, and this affects many decisions on risk management. (The classic example is the request by an impoverished university for staff to take voluntary redundancy, which may be just what the university needs for its survival, but may not be embraced as enthusiastically by staff) (Lockwood & Davies 1985)
- In the case of academics, professional recognition comes largely from the discipline rather than the employer (National Academy of Sciences 2005). Thus, if a crisis arises academic staff generally tend to support the discipline rather than the university (Andrews et al.2016). This carries a constant risk (at least from a management perspective) of staff uncertainty and unreliability. (“Union solidarity is not strong in Australian universities but professional loyalty is” (Watts 2017))
- In the case of non-academic staff, loyalty tends to be split between colleagues and the institution. While academics can move from one university to another this is less practical for non-academic (both clerical and professional) staff, who are far more dependent on career advancement within the same institution, as well as the support of their fellow staff (Lewis 1988). This in turn means that loyalty is essentially local – often to a single campus, unit or

group of colleagues. The risk here is that decisions will be made in favour of local rather than institutional or sector wide interests (Benveniste & Benson 2012)

- Another aspect of risk is becoming important as more and more Australian universities turn to external services and outsourcing for their daily operation is the attitude of temporary staff and contractors. Temporary staff have less allegiance to their place of work than their tenured colleagues and are far more likely to put their own interests ahead of the institution (Clark 2005). Contractors, on the other hand, may work across several institutions but realise that their employment can only be ensured until the expiration of their current contract. For this reason, the risk management they engage in may be more closely aligned to their personal self-interests as opposed to those of the university (Smith 2015)
- In the case of students, the greatest risk is lack of recognition of their qualifications and experience (Paton 2007). Thus, while students are frequently indifferent to the general risks to which their institution is exposed (provided this presents little personal threat) they remain anxious to ensure that the academic reputation of the university remain untarnished. For this reason, while scandals involving the personal lives of university staff members are tolerated (indeed admired or laughed at) anything that presents a threat to the academic integrity of the institution as a whole must be avoided (Turk 2008).

University managers attempt to unite these diverse interests in three ways (taken largely from Winefield, Boyd, Saebel & Pigniata 2008):

- By stressing that risks are always taken for the benefit of the institution as a whole, never solely for one or more sectional interests. (Thus, the commencement of a new program – always a risky venture – is normally presented as an accomplishment of the university as a whole rather than a triumph for any particular group)
- By reminding critics that if one part of the university fails the remainder is likely to go down with it. (Thus, the closure of a course may not simply affect those taking classes within it. The closure is far more likely to impact on the university as a whole)
- By stressing the collegiate and cooperative nature of a university, in which the members of the institution combine to make a collective whole (Schrecker 2010)

This in turn impacts on risk – both what is said about it within the academy, and how it is handled.

### **3.1.2 Conditions for Risk to Exist**

As mentioned previously (Section 3.1.1) while a precise definition of risk remains elusive, the term has an agreed range of meanings, normally implying an environmental outcome that is harmful or undesirable, but at the same time often avoidable with prudent management (Conrow 2003).

Approaches to risk in Higher Education are often overlapping, but include:

- A sense that risk is unavoidable if an organization is to discharge its responsibilities. As such there are no risk-free options in Higher Education (Ruby & Jarimallo 2013) At the same time, Higher Education values stability and, where doubt exists, virtually all universities are inclined to take a conservative approach to minimise disruption, financial or reputational loss, and in this context risks are unwelcome (Cassidy, Goldstein, Johnson, Mattie & Morley 2012)
- A sense that risk defines and limits objectives, because the consequence of risk may well be a failure to achieve the most desirable outcome. Risks can rarely be quantified but this is not

true of objectives which may well be given a precise fiscal or numeric value (such as reducing the percentage who withdraw, increasing the number of applicants or improving staff publication rates). This in turn makes the achievement of objectives a convenient tool for measuring the quality of the institution (Cerri 2012) and to prevent embarrassment virtually all objectives in Higher Education are set in the light of the risk that can be tolerated (Baker & Reid 2004)

- The fact that Higher Education regards risk as dynamic and constantly changing, similar to the waves in the sea, each of which may rock the boat in a slightly different manner. Universities normally perceive the instability of this produces as one of the costs of doing business, with the feeling that they can always opt out or change direction if the cost becomes too great (Featherman 2014). This “risk tolerance” may be deceptive, however as institution may wish to make change but be unable to do so at a reasonable cost or within a realistic time frame, particularly if this will leave behind unfulfilled commitments (KPMG 2016)
- The phenomenon whereby Higher Education sometimes seeks to control risk through silence, where the danger is seen as an unmentionable aberration that must be quarantined lest it spread more widely, affect morale and impair the efficiency of the institution, and if not discussed will go away. This in turn may give the impression that academic leaders are ignorant of, or indifferent to risk. This is not the case – it is simply that they are often reluctant to share their thoughts too openly with underlings (McKellar 2017).
- In Higher Education reputation is everything, as once confidence is lost there is little point in the continuation of institutions (Haldene et al, 2015). For this reason every threat to a university, irrespective of its source, is perceived as a challenge to its status and standing (Lacy et al.2016). While other fears may be equally disastrous (and hence can be rarely ignored) risk in Higher Education is continually focused on the protection of image – a position that separates the academy from much of the commercial world (Fitzsimmons & Atkins 2017)
- Higher Education attempts to control risk through specialisation – in other words by concentrating on those things that it does really well and being prepared to sacrifice others (Cantwell & Kauppinen 2014)
- The timespan (and hence the period for a return on investment) in Higher Education is extremely long. This means the period of exposure to risk is extended, although as a general rule the consequence should risks emerge can be less than in business. [“One mistake can destroy a business. A single mistake rarely harms a university” - Mittelstaedt(2004)]
- The public are generally tolerant and forgiving of risk taking and poor decision making by higher education institutions. Thus, universities can absorb far more punishment, bad press and public criticism than their commercial counterparts, provided this places no tarnish on their core values (Gross & Levitt 1998). Errors in Business are perceived as evidence of incompetence and lead to shareholder revolt. In Higher Education equivalent errors are far more likely to be regarded as eccentricities and forgotten. Critics learn from their commencement in kindergarten not to challenge the actions of the school master (or in this case the university, as the school master’s successor) – a prohibition that has a significant effect when it comes to risk in Higher Education (Crisan & Toma 2016).
- In Higher Education virtually all decisions are made by committees, and this makes it harder to apportion blame to individuals. Collegiate decision making also limits impulsiveness and personal agendas, making it difficult for excesses to emerge (Singh & Stuckelberger 2017). Again, this has a significant effect on approaches to risk.

### 3.1.3 Causes of Risk

Because of difficulty in defining the meaning of the word *risk* it is rarely easy to explain its cause. If risk is seen solely as a mental construct– a position that might explain why one person fears the outcome should risk eventuate while another does not – its causes are cognitive and are grounded in past experience and future hope (Morgan, Fischhoff, Bostrom & Atman 2002). If, on the other hand, risk is considered as something beyond those immediately involved – an unseen agent shaping human destiny from a hidden world – risk becomes an exercise in probability, reducible to a calculation based on frequency and severity (Hassett & Stewart 2006). Thus, it is rarely a matter of whether risk will occur – it is more a question of how quickly it might impact on its victims (Kagan 2018)

The approach taken to risk in Higher Education sits on a balance between these extremes, with risk being seen on the one hand as an uncontrollable external force (virtually as a law of nature) that operates independently of its observers, while on the other it is seen as both subservient and manageable, and hence completely controllable (Kelty & Bunton 2017).

This conflict can be ameliorated by considering risk under the three causes that are traditionally ascribed to it (Eckwert & Zilcha 2015):

- Perceived causes
- Ascribed causes
- Actual causes

#### 3.1.3.1 Perceived causes

The perceived causes of risk are entirelyly cognitive (Gurian 2009). Humans operate on the basis of cognitive dissonance, in which the mind establishes a relationship between causes and effect which may or may not be a reflection of reality. Thus, when something goes wrong (or is expected to go wrong) it is a normal human reaction to seek a cause, even if this cause is completely inappropriate. (i.e. “We lost the game because my car broke down”). This mode of thinking occurs frequently in Higher Education as much of the theory of teaching and research is based on an assumed mental connection – even if no more than a hypothesis - between cause and effect (Daniel & Harland 2018).

While the perceived causes of risk are often used to establish post-event blame, they are used more commonly brought forward to alert others to the danger in the hope that similar outcomes can be avoided in the future (Davies 2015). (i.e “He had an accident after leaving the hotel – he must obviously have been alcohol impaired at the time” – even if the accident was someone else’s fault, the implication being “Don’t drive after visiting a hotel”). The danger is that false assumptions, such as the attribution of harm to an inappropriate cause may blind risk takers to actual dangers and prove deceptive. Unfortunately, most risk management – in life as well as universities - is based on *perceived* rather than *actual* risk and is essentially an outcome of the emotions than the product of logic (Sjoberg 2007).

Actual Risks are those that have a genuine existence, as identified by an impartial observer, who can usually do nothing about them. Perceived risks are those foreseen by someone immediately involved, although in many cases these may lack reality and be a mental aberration (Corvello, Flamm, Rodricks and Tardiff 1983).

As will be explained in Chapter 8 much of the risk management in course accreditation would appear to be based on perceived causes of risk – often assessed on a historical basis - rather than on the immediate environment and the current circumstances.

### 3.1.3.2 Ascribed causes

The ascribed causes of risk are normally taken into account after an event and may well be used as an excuse for an unexpected – and hence undesirable - outcome. (Viner 2016). These ascribed risks are then taken into account in future planning. The difficulty lies in the fact that ascribed causes may be neither adequate nor realistic and that any preparation to avoid them may be guarding against a phantom (Foster, Bernstein & Huber 1993).

This is particularly the case in Higher Education, where failure is often attributed to circumstances rather than groups or individuals (Huber 2011). This gives every incentive to prevent these circumstances arising again. This problem is compounded by the collegiate decision making procedures found in higher education (Alfred 2006). Committees lose corporate memory as their membership changes, and for this reason are heavily dependent on precedent (Stephenson 1996). This dependence means that previously ascribed causes of difficulty are rarely challenged (Stewart & Cohen 1999).

Dependence on precedent may give rise to *embedded risk management* (Hopkin 2017) where suspected risks are avoided through habit rather than necessity. Embedded risk management – in other words, risk management without thinking - carries a further danger. The fact that a particular action is applied unthinkingly may well exclude any response that is more appropriate. This can cause enormous difficulty in the changing world of Higher Education where today is rarely the same as yesterday.

Embedded risk management imposes an additional burden on course accreditation. As particular risks are assumed automatically, often without reference to the circumstances, the strategies for avoiding them may be written into procedures, effectively binding the hands of those required to implement them (Bridge 2017). [An example in course accreditation is the ponderous way in which committees are expected to work through course proposals. This may have been practical at earlier times when there were only one or two submissions to be considered at each meeting. In a modern university, however, there may be 30 or more proposals to review, and the procedure loses touch with reality.]

### 3.1.3.3 Actual causes

The actual causes of risk tend to be forensic and are generally uncovered as the result of post event intervention or through a thorough review of the circumstances, such as the procedure after an aircraft accident, or in Higher Education after financial misappropriation or a serious scandal. The institution then takes steps to ensure that these things will not occur again (Price, Waterhouse Coopers 2017).

The difficulty with a forensic analysis is that it takes time and resources that most universities cannot spare. For this reason, many of the actual causes of risk in Higher Education are *attributed* to causes rather than *verified* as being the outcome of these causes (Yoe 2012). This is particularly the case when these risks are ascribed by a major figure, who acts as an authority within the institution and might otherwise not be challenged, such as a Vice Chancellor or senior manager.

As a general rule neither academics nor administrators tend to challenge pronouncements that fall outside their area (particularly when made by an authority figure) and, as such, attributed risks are often accepted without question (Barnett & Griffin 1997). This acceptance creates a tension between actual and attributed risks, with institutions making every attempt to avoid attributed risk while ignoring far more dangerous actual risks (Borrero & Cabal 1993).

This tension becomes extremely important in course review, particularly when a program has been unsuccessful. The failure may be attributed to various causes (demographic change, poor publicity, competition from others, and so on) all of which are beyond the control of the university - while the actual cause – perhaps an obsolete curriculum – passes unnoticed (Brown 2013).

### 3.1.4 The Recognition of Risk

It might be inferred from what has been written in the previous section that universities are deficient in their ability to identify risk. This is not the case. The issue is not a matter of acknowledging risk, it is far more a question of making an appropriate response to it (Carey 2015).

The difficulty lies in the fact that there is often a conflict between business methods and the traditions of the academy, both of which are relevant to a modern university. In business it is normal practice to respond to risks (if deemed significant) as quickly as possible. The tradition of the academy – possibly as a relic of the medieval Church – is to do little, and to take a *wait and see* approach (Farrow & Kasarda 2009). Thus, Higher Education tends to delay taking any position until all factors have been considered. This may be an administrative extension from the normal peer review and collegiate processes found in a university but is possibly more a reflection of the inherent conservatism of the university sector, where decisions by committees take time (Melear 2016). The issue is, therefore, not one of how universities recognize risk, but how they choose to respond to its existence.

#### 3.1.4.1 Risk Intelligence

Universities have access to many sources of information. It would be surprising if these organisations lacked knowledge of the existence (and possible consequence) of risk to their daily operation. *Risk intelligence* – the ability to perceive and assess risk - is well developed in universities (Apgar 2006) although its reporting line from analysts to senior managers and the university executive rather than direct to the academic community tends to conceal this from public gaze (Neave 2002).

The mechanism through which risk is assessed in Higher Education is well documented, and there are in fact a number of commercial packages that are widely used in Australian Higher Education - a prominent example is the Deloitte *Risk Intelligence Map 2017* (Appendix D) - alongside many within-house developed variations.

There is a danger, however, of excessive information creating a *risk aversion* attitude. To avoid this risk intelligence is normally filtered through a series of channels such as a Vice Chancellor's Advisory Committee, or in some cases through the Audit and Risk Committee of the University Council. These bodies tend to keep potential threats to themselves, with only minimal communication to academic staff and the rest of the university (Smith P. 2015).

This means in turn that the operational staff of universities need not be aware of the risks to which their institution is exposed, and as a general rule may think little about these things until they are brought to their attention by senior executives, often in the face of a crisis (Wheatley 2011). Hence, while senior management is normally aware of the risks faced by a university its staff may not be and may proceed as though these risks simply don't exist (Kyvik 2009).

To avoid this, while at the same time not revealing specific concerns, senior management almost always insists that particular protocols be followed in all stages of a university's work (Kulakowski & Chronister 2006). While emphasised perhaps more openly in areas such as Finance, Information Security or Records Management, this approach overlaps into the academic sphere, where universities - and their regulators - insist that certain procedures be followed to prevent identify fraud, misappropriation or data theft (Kamvounias & Varnham 2010).

This in turn impacts on course accreditation, where procedures are in place to avoid risk (such as the need for a cooling off period between the date of approval and the date of commencement of a course to ensure that all resources are in place before classes commence) but often without revealing what these risks happen to be.

### 3.1.4.2 Risk Sensitivity

*Risk sensitivity* is a term that originated in Finance to indicate the willingness of investors to take risks, particularly at a time of uncertainty and instability (Kaceinik & Bateson 1997). Risk sensitivity is rarely fixed or stable and varies widely with the context and environment. While there are a number of instruments for assessing risk sensitivity in Higher Education, such as the use of a modified version of Schlee's Theorem (Appendix E) for assessing the capacity of risk acceptance in particular institutions, it would appear that most of these mathematical instruments are either unknown or distrusted by Higher Education managers, and are confined solely to university planning units (Eckwert & Zilcha 2015).

Risk is accumulative (Kelty & Bunten 2017) and higher education institutions can quickly approach the point of *risk saturation* (Featherman 2014). Unsurprisingly, as risk saturation approaches, risk sensitivity increases (Miller & Akers 2017). This becomes particularly important in areas where institutions stand to lose large sums of money – for example; through investment in infrastructure, where there is a fear of throwing good money after bad - or where there is a risk of damage to reputation or professional standing (Harish 2011).

The vast majority of Australian universities have systems to warn of risk saturation, although most of these concentrate on financial risk rather than academic activity (Coates 2013). The issue becomes important in course accreditation, however, as institutions assess the financial viability of course proposals. There is always some risk in offering new programs, although most universities are prepared to accept this as one of the costs of doing business. This attitude hardens, however, as risks increase through the offer of many new programs, to the point where institutions may impose a quota on the number of new awards to be introduced each year (Davis 2017).

### 3.1.4.3 Conscious recognition

The term *conscious recognition* involves a deliberate recognition of *foreseeable* risks and is used normally as a contrast to the unconscious – perhaps instinctive – anticipation of unforeseeable risk that will be discussed in the next section. The key term is the word *foreseeable*, as until a risk can be perceived it remains beyond consciousness or consideration. [An illustration often used concerns a person who is delayed on the way to the airport. The risk that he will miss his flight is perceivable and calculable. The risk that the plane will crash on take-off is not. Thus, the person will concentrate on the first – the subject of conscious recognition - and simply not think about the second]

Conscious recognition applies to both anticipated and verified risk although the two are often distinguished elsewhere, possibly because of the priority given to their amelioration – confirmed risks are avoided before those that remain unconfirmed.

There is a distinction between an identified and a verified risk. A risk may have no real existence (such as a fear of harm from ghosts) but may still cause the risk taker to avoid certain situations. A verified risk on the other hand, is one whose reality can be confirmed from experience or external evidence, such as the danger of taking naked candles into a powder magazine. Conscious recognition applies equally to both forms of risk. (Adams 1972)

A conscious recognition of risk forms the basis of all risk management and insurance procedures. (Koob et al. 2016) (Defence cannot be taken against a risk before it has been properly identified, nor can insurance be provided until all credible – even if not all possible - risks have been taken into account by underwriters) The difficulty is that tertiary institutions attempt to protect themselves from

risks of all types, no matter how probable or improbable, and this is something that insurers are neither able nor willing to provide (Department of Education and Training 2005).

The need to protect against all risks is a human failing that is well known in Psychology, where it is viewed as a form of obsessive-compulsive behaviour which often indicates adult immaturity (Furedi 2002). In business, on the other hand, it generally denotes insecurity on the part of management, and an inability to trust (Hunt 2003). This in the case of Higher Education leads to risk timidity.

While there has been little work done on *risk timidity* as a general study in Higher Education (Wessels & Sadler 2015) there are a number of areas which have received much closer investigation. These have revealed areas where universities appear particularly sensitive to risk and will avoid it where possible. These include:

- Financial Risk (Higher Education Funding Council for England 2011) – No institution wishes to have its money lost or stolen and takes precautions accordingly.
- Reputational Risk (Hedgecote 2016) – No institution wants an unsatisfactory reputation and will go to inordinate lengths to ensure that this doesn't happen.
- Physical Risk (particularly harm to individuals) (Bubka & Coderre 2010) – Universities constantly act “in loco parentis” and will take extraordinary steps to safeguard those committed to their care.

In all cases, these are a defence against consciously recognized risks that can be anticipated well before they might occur. A much greater danger lies in risks that are equally torturous but are simply beyond consciousness (Brynin 2013). Fortunately, nature has not left humanity without resource even though the solution created is less certain (Breakwell 2014).

#### 3.1.4.4 Unconscious recognition

While the previous section dealt with risks that could be specified (even if the possibility of their occurrence might be small), a far more significant issue involves the unconscious recognition of risk, within which individuals (and hence the organizations under their control) have an instinctive response to as yet ill-defined and unidentified dangers. The intuitive feeling that risk lurks nearby – even if its cause remains undisclosed - is a human survival mechanism that prevents or encourages an appropriate response despite the fact that full details (and hence a complete justification for the action) are unavailable (Stewart and Cohen 1999). [Thus, people hesitate before walking down dark streets late at night, not because of any confirmed or pre-identified danger but simply because there is a possibility that unfortunate something might happen (Margolis & St George 2008)]

An unconscious recognition of risk arises from two sources – the personal experiences of the person and the past reports of others. In the case of corporations, these experiences are expanded beyond the individual through the shared memory of all participants in the decision making process (Jennings 2014). Decisions are rarely made through a mere counting of votes, however. If doubt exists, the normal human response – both as individuals and as collegiate groups – is to view this uncertainty as a warning and to avoid any action that might lead to undesired consequences (Harrison, Ahn & Adolphs 2015). This hesitation is made worse in a collective or collegiate situation, where only a few voices of dissent may be sufficient to cause those previously in favour to waiver and change their minds (Leiss 2001).

This unconscious awareness of risk becomes extremely important when there is insufficient evidence on which to make a firm judgment, as in banking, finance and university situations (Thoma, While, Panigrahi, Strowger & Anderson 2015). As will be shown in Chapter 6 this is particularly the case in course accreditation, where much has to be taken on trust and where many variables are unknown.

#### 3.1.4.5 The danger of pseudo-risk

Despite this instinctive response there is always a danger that reliance on emotions rather than evidence may give rise to fears of *pseudo-risks* - in other words, the avoidance of risks that are simply not there (Scinicaroello & Portier 2016).

To avoid this, risk takers normally consider three factors (Drawn largely from Travers (2011)):

- Past experience and precedent
- Present circumstances and the environment
- The consequences if the risk should eventuate.

Pseudo-risks arise normally through a misunderstanding caused by inadequate, incomplete or insufficient information (Kendrick 2015). Sufficient is known to make the threat seem realistic, but insufficient to make a clear judgment. People therefore make assumptions to avoid these risks even though their fears have no foundation (Lindstrom 2009).

Universities often find it difficult to distinguish between actual and pseudo risk, largely because too little is known. For this reason, most tertiary institutions tend to treat pseudo-risk as though it were actual (Brynin 2013). For this reason, risk taking in Higher Education is inherently conservative, and where options exist institutions will invariably choose the safest path (Kennedy 1997).

#### 3.1.4.6 Risk mitigation and avoidance

As universities are conservative in nature, it follows that risk should rather be avoided than averted, and where this proves impossible, that the consequences should the risk eventuate need be kept to a minimum (Birch, Pye, McDonald & Baker 2017). This is normally done by:  
[Taken with expansion from Sum & Saad (2017)]

- Identifying obvious risks (threats that past experience suggests are most likely to happen) and minimizing their effect should they occur
- Avoiding being first with a novelty – a recent example being the use of MOOCs for program delivery
- Leaving risk ventures in the hands of an entity rather than the mainstream university [A typical example involves teaching in languages other than English, which a number of universities have chosen to do under contract through a university entity rather than through their normal channels of delivery. If failure occurs it then becomes the fault of the entity rather than the university, which can remain free of blame (Price 2018)]
- Marking time, with a reluctance to reach a final decision until all factors are made known, or the issue becomes obsolete.

As will be shown in Chapter 8, many of these factors are replicated in course accreditation procedures.

## 3.2 The Literature on Risk Management

There have been many writers on risk. The works cited below should be seen primarily as examples of the approach to risk mentioned during the interview process which informants suggested had influenced their approach to this sphere of responsibility. [Few informants mentioned authors by

name - nor would they have been expected to do so. Many, on the other hand, were happy to explain their approach to risk, leaving it up to the researcher to trace the views they had expressed back to their source. There are many alternative approaches that could have been taken to risk, but these have been overlooked here as perhaps less relevant to the views of practitioners in the workplace] Even where specific approaches are suggested the works cited are by no means exhaustive, but are used as examples of the various approaches to risk found in Higher Education, all of which may be encountered in course accreditation

### **3.2.1 Ruzic-Dimitrijevic & Dakic (2014) - Risk as a necessity for improvement**

The essence of Ruzic-Dimitrijevic & Dakic (2014) is that a university cannot improve without taking risks. These risks are of three types:

- Operational – the risks incurred in the normal course of business
- Strategic – the risks incurred in seeking new opportunities
- Organisational – the risks incurred as a result of restructure, or some other change in internal organisation.

Universities limit these risks by maintaining a careful balance between losses and benefits. The risks that most universities concentrate on are those within the operational area (finance, enrolments, stakeholder confidence, and the like) largely because these give a quick response and the consequences are visible to the university as a whole. Other risks take longer to mature, and this lengthy gestation may make it harder to learn from the experience as the factors underlying the original risk may well have been forgotten.

Less emphasis is placed on strategic risks, which while slower in emerging are generally obvious well before they arrive (such as over expansion, under capitalisation, declining demographics, and so on). The primary difference is that the control of these risks – unlike operational risks – are in the hands of fewer decision makers and hence beyond the sphere of staff.

A greater but less realised threat lies in organisational risk, and here the danger lies in obsolescence and irrelevance through a failure to change structure and responsibilities in sufficient time. Knowledge is dynamic, and, as such, those responsible for its dissemination must be constantly willing to change, even if this results in short term disadvantage. The problem lies in the fact that universities tend to value stability more than change, and this inhibits improvement (Henard & Leprince-Ringuet 2008).

Ruzic-Dimitrijevic & Dakic suggest that all three of these elements come together in a university's business and operational systems. Universities develop their systems with a view to encouraging innovation while limiting risks. This is done by taking short steps and waiting to see what happens, rather than taking vast jumps into the unknown. Thus, if it is easier (and potentially more efficient) to omit something this is done, but only that single step is involved. If the step proves superior to the risks incurred additional steps may be taken. If the step proves deleterious the university can retreat back to where it was with only a small loss. This leads to a strategy of development by "wait and see", "back and fro" or "fits and starts" that may distress stakeholders and confuse the community, as it suggests inconsistency on the part of management and uncertainty on the part of decision makers (Guster & Brown 2012). For this reason, most universities that take this approach implement improvement through the use of changed procedural protocols, using these staff directives to take the initiative away from the ill-informed. A university's success in using this approach depends, however, on the ability of staff to apply these protocols in a meaningful way, not as robots or automations, but as thinking individuals, and if this cannot be done it may well become a source of weakness (Hil 2015).

### 3.2.2 Raanan (2008) - Risk as an indicator of entrepreneurship

A different approach is taken by Raanan (2008) who views Risk as evidence of entrepreneurship and hence an indicator of innovation and improvement. Thus, the greater the degree of risk taken by a university – something that can be measured easily - the more entrepreneurial the institution (something less easily measured) and hence the sign of a forward moving academy (Arrif et al.2014). The cart does not drive the horse, however, nor is this risk taking completely uncontrolled. It is the university that operates as an entrepreneur and it is the university that takes the risk, rather than the individuals within it. Despite this, the greater the spirit of enterprise within a university the greater the willingness of the staff themselves to take risks. Thus, the most successful university is one in which management allows staff the flexibility to take risks – albeit within prescribed boundaries - without the need for prior approval from superiors (Bass & Riggio 2006).

This may appear to be a recipe for chaos and disorder, with every individual doing what seems best in their own eyes, but Raanan counters this by suggesting that it is actually an exercise in discipline, with each staff member acting as his or her own risk manager. Thus, members are aware of the needs and requirements of others as well as their own limitations and are prepared to work within this envelope for the common good. What is removed is bureaucracy, interference and delay, with the best decisions being made promptly by those directly involved.

Unlike Ruzic-Dimitrijevic & Dakic (2014) Raanan believes virtually all risks are operational in nature, with the so called *strategic risk* and *organisational risk* of earlier writers being seen as little more than an extension of operational risk rather than something existing in a sphere of its own. Raanan (p 45) divides operational risk into numerous categories:

- Academic risks
- Research risks
- Teaching risks
- Quality risks
- Faculty risks
- Ethical risks
- Political risks
- Management risks
- Leadership risks
- Institutional risks
- Financial risks
- Legal risks
- Unforeseen (and hence unforeseeable) general risks

Each of these is overseen by particular individuals within the institution, all of whom should have the power to identify the risks occurring within their area of responsibility while taking action to mitigate them (p47). After taking appropriate action, these persons can then inform their superiors. It is only in the case of the last mentioned (unforeseen general risks) that cannot be handled locally that advice may be needed from a more senior person.

In this model *risk intelligence* flows up the management chain rather than down. Senior staff are made aware of what has been done after the emergency has been met, and if the action is felt inappropriate the member can be counselled accordingly. The key point, however, is that the decision to risk something is made as close to the scene as possible, not after authorisation by a superior authority. This model (where every person is his or her own risk manager) requires more than staff training. It is essentially the development of an attitude – a *risk appetite* – whereby staff members are encouraged to take risks on their own initiative after considering all available options, and will be supported for doing so, even if these lead to undesirable consequences. The key point is the achievement of fast and

accurate decisions without the inevitable delay that follows the need to seek the advice and gain the approval of others. This can lead to mistakes but can also provide a learning experience for the staff involved (Laskovsky & O'Donnell 2018)

There remains a measure of control, however. Staff responsibilities must be clearly defined and boundaries established. This is done through the creation of procedures that staff are required to follow, the vast majority of which set limits on the action that can be taken under particular circumstances (TEQSA Guidance Note: Academic Integrity, TEQSA 2017 f)

While both Rannan and Ruzic-Dimitrijevic & Dakic may appear to end at a similar point (viz; that it is adherence to procedures that restrains risk rather than the intent of individuals) what separates the two is the emphasis on personal responsibility. In the Ruzic-Dimitrijevic & Dakic model it is the procedure that determines the actions of staff, provided they apply these instructions in an intelligent and meaningful manner. In other words, it is the procedures that tell staff what they ought to do. In the Rannan model the complete opposite applies – the procedures set by universities are equally binding, but in this case set limits by telling staff what they ought not to go beyond, and hence what they are not permitted to do. The first removes responsibility by shifting it to the system, as in this case staff are exonerated if they do as they are instructed. The second imposes an additional responsibility by requiring staff to exercise a measured judgement within established boundaries, and in this case to subsequently communicate their decision to higher authorities (Australian Government Publishing Services 1986). (There is no need to communicate in the Ruzic-Dimitrijevic & Dakic model as it is assumed that there will always be obedience to procedures and hence if these are followed there will be nothing to report)

As will be shown in Chapter 8, a composite model incorporating both philosophies is followed in virtually all Australian universities, where the prescribed systems establish what ought to be done (in accord with the Ruzic-Dimitrijevic & Dakic model) while staff are allowed considerable autonomy (in accord with the Rannan concept of individual risk management) within it.

### **3.2.3 Pedro-Neves (2014) - Risk as a validator of institutional integrity**

Neither of these approaches are sufficient on their own, however. If individuals are to assume responsibility for their own risk management, they must also be aware of the work of their peers and colleagues and ensure that nothing they might do will impede upon the risk management of others. For this reason, effective self-initiated risk control can be seen as a measure of institutional integrity (Pedro-Neves 2014). [The word “integrity” in this case refers more to institutional harmony than it does to moral value. The organization is “integrated” effectively, so that each part knows that the other is doing - Chapman & Lindner 2014]

This concept becomes particularly important in a collegiate situation, where the risk management decisions are essentially those of a group rather than an individual. This in turn means a shared responsibility should things go wrong (Rauzi 2017). If, however, an institution is prepared to take risks (particularly if successful in the risks that it takes) generates considerable self confidence in itself and is likely to assume a greater risk appetite in the future (Huber 2011). Conversely, an institution – whether a university or not - that fails to take risks is in danger of stagnation (Cowen 2017). For this reason, a willingness to take risk may well be an indicator of institutional health and vitality (Committee on Decision and Risk Taking 1982).

It is interesting that this appears to be the position taken by TEQSA as well. TEQSA is not against risk as such (indeed quite the contrary) but is strongly opposed to hasty, incautious and uncontrolled risk by those who are ignorant of its existence (TEQSA Guidance Note: Research and Research Training 2018). On the other hand, controlled and well managed risk reflects a well-managed and tightly integrated academy (TEQSA 2018c).

### **3.2.4 Arrif et al. (2014) - Risk as a unifier through shared responsibility**

Arrif, Ahmad, Ishak & Ismail (2014), while dealing specifically with Malaysian issues, approach the problem of risk in a more positive way, suggesting that risk is more frequently a benefit rather than a distraction. This is particularly the case where risk gives staff a target to achieve, avoid or overcome through a sense of shared responsibility.

Arrif, Ahmad, Ishak & Ismail note that there are few instances in a modern university where one individual can achieve a desired outcome on their own. Outcomes are achieved through team effort never individually. While individuals may benefit personally from this, their success is made possible only by the efforts of their fellows, all of whom will ultimately succeed or fail together (p9).

This joint effort makes risk an institutional unifier through stressing a common danger. It is important to note that the key term in the previous sentence is “common danger”. The risk framework suggested by these authors excludes those risks taken by individuals on a personal basis, even if done in the name of the institution (the test is whether the individual will benefit personally). Risk in this context is seen as a group responsibility, with participants working for the common good rather than themselves.

This approach to risk – where the risk itself is a danger to all, but where its management is delegated to those on duty at the time (or those elected or appointed to particular positions) is found in many aspects of the collegiate structure of Higher Education, is a common feature of Higher Education Risk Stewardship, and is a noticeable feature of course accreditation procedures.

### **3.2.5 Lundquist (2015) - Enterprise risk management in Higher Education**

The term enterprise risk management carries many meanings in Higher Education. The original meaning involved whole system risk management – in other words an overview of all risks faced by an organisation, many of which tangled with (or otherwise reinforced) each other, and hence needed to be addressed together rather than separately (Beasley 2016). These in turn require joint rather than individual action. Enterprise risk management in Higher Education tends to be a mutual activity, conducted jointly by peers rather than subordinates (Kageyama 2012).

Lundquist (2015) in her dissertation on enterprise risk management in colleges and universities suggests a number of key points that distinguish enterprise risk in the academy from its counterparts elsewhere. These include:

- A different view of risk. In Higher Education, risk is viewed as a constructive challenge, and is in fact used to shape as well as defend organizational objectives. [“A willingness by academics to stick one’s neck out shapes the philosophy of the academy” (Shattock 2010)]
- Universities tend to be more willing to forgive failure, particularly if this provides a learning experience. Thus, the person, unit or division within a university that makes an attempt but fails suffers far less than their counterparts in other fields, particularly if it can be shown that something has been learnt from the experience. This willingness to forgive – perhaps a relic of the medieval church - may in itself be a source of future failure (Folbre 2010).
- Universities tend to be willing to compromise, particularly when issues are uncertain. This in turn makes the identification of risks less specific than they are elsewhere, and this in turn enables further compromise to be made should the need arise (Gittell 2017).
- Universities tend to have far longer memories than those in other fields and these often shape the approach to risk long after the original decision makers have departed. This extended corporate memory may well become part of the culture of the organization, with certain risks

being taken as a matter of routine while others are avoided at all costs, often without a justifiable reason (Cassidy, Goldstein, Johnson Mattie & Morlie 2012).

- Universities are places for natural risk takers. The fact that both staff and management in Higher Education are willing to take risks as an unthinking part of their daily activity shapes the risk management philosophy of the institution (Helslooth, Vlagsma, & Kraaijenbrick 2017).
- Universities communicate far more effectively than many other industries. This includes the threats and dangers of risk, which, while kept secret and confined to a small circle in other areas, are openly discussed by staff and management in Higher Education. This, in turn, enables risk to be addressed collectively and collaboratively (Smith 2015).

Thus, there is a distinction between enterprise risk management in Higher Education and the corporate world. The majority of Australian universities have embraced enterprise risk management with enthusiasm (UQ 2012) although because of the differences from the more familiar areas of commerce this is rarely recognized by outsiders (Zaaiman 2017). Further reference will be made to this in Chapter 8.

### **3.3 Types of Risk**

#### **3.3.1 Risk Identification and Anticipation**

While it is easy to list the many risks to which universities are exposed (see the URMIA Risk Management Chart on the following page and also Appendix F), it is much more difficult to be specific about how these risks are managed in Australian Universities. Australian universities tend to sub divide all of the risks shown into one of two categories, preventable and avoidable risk, and unforeseen (and hence unexpected) risk.

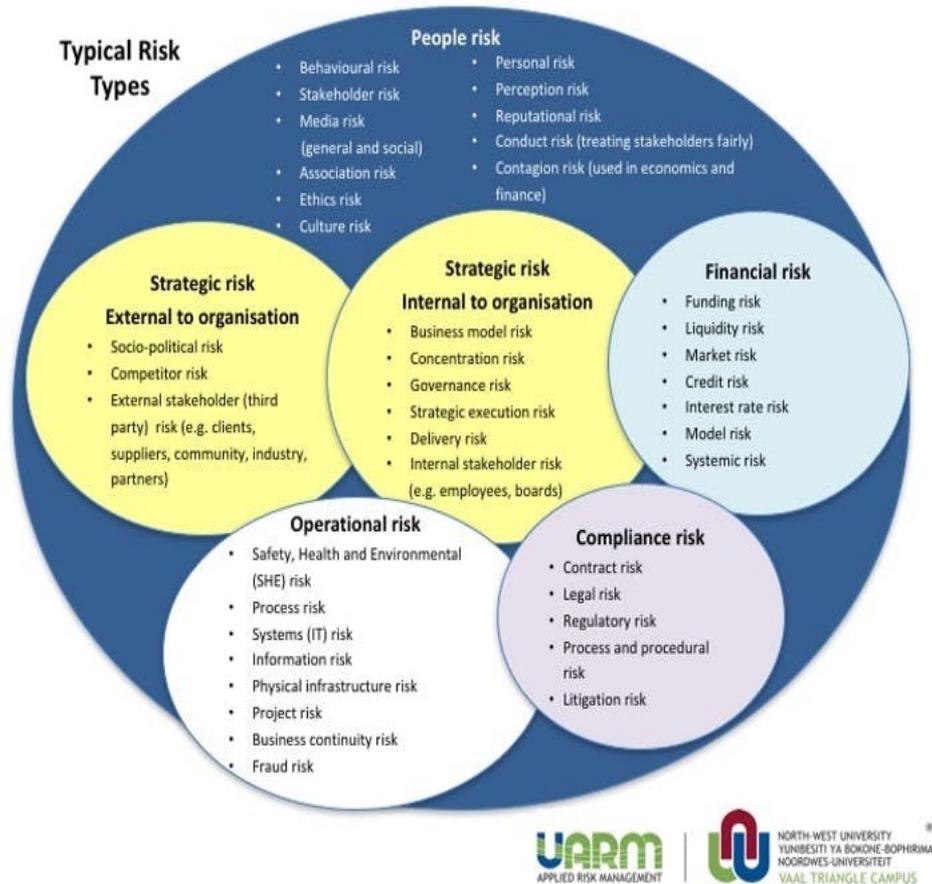


Figure 3.1 URMIA Risk Chart

### 3.3.2 Preventable and avoidable risks

Preventable risks are managed through prudent management. The institution is aware from their own experience (or the experience of others) that various things could happen and takes appropriate measures to limit the consequence should these things occur. Thus, all Australian universities have a system of internal auditors to prevent financial misappropriation, a system of safety officers to limit exposure to physical hazards, and many risk prevention officers. The work of these staff is normally well defined and their duties clearly understood. There are, indeed, set boundaries to which their work is confined, so that it would be rare to find, for example, a safety officer checking financial returns or a university auditor taking responsibility for after-hours security. The difficulty lies in the fact that having established appropriate personnel for managing specific areas of risks, the remaining staff may feel that all risk management can be safely left in their hands (Birch et al. 2017).

This is contrary to the spirit of the Higher Education variant of enterprise risk management and opens the door to many lost opportunities (Lundquist 2014). Despite this there has been an increasing tendency in recent years to make risk management a specialized role in Australian Higher Education, a position encouraged by regulators as a means for ensuring better compliance and communication (Phillips KPA. 2012).

### 3.3.3 Unforeseeable Risk, and Contingency Planning

It should be noted that almost all of the Directors of Risk (mentioned above) in Australian universities are concerned with preventable risk rather than unforeseeable (or less probable) risk. These people are not expected to deal with unforeseen or unexpected risk (Victoria University 2018, University of Queensland 2018).

Essentially the Directors of Risk in Australian universities are concerned with *insurable* risks. The risks that cannot be covered by insurance – possibly because the probability of their occurrence cannot be calculated by actuaries – normally lie beyond their brief. This does not mean that universities leave themselves exposed to the unexpected – it is simply that risks of this type are normally handled by staff in a separate division or unit. The vast majority of Directors of Risk are attached to Finance or Facilities units (possibly because of their role in audit or OH&S) but those with a responsibility for the unexpected (or less likely) risks faced by a university tend to be located in the planning unit - or alternatively the governance support unit - where their task is to undertake contingency planning to circumvent the unexpected should it occur (De Zilwa 2010).

The separation of foreseeable and unforeseeable risk management in Australian universities is a source of potential weakness (Blackmur 2007) that - as will be shown in Chapter 8 - has a direct impact on risk management in course accreditation. Put simply, foreseeable risk is normally handled at the initial course proposal stage, while unforeseeable risk is addressed by the course accreditation committee, with little if any communication between the two.

### 3.3.4 Risk Mitigation

The term *risk mitigation* has at least three meanings in Australian Higher Education:

- On the one hand it is often a synonym for *risk avoidance* – where mitigation means not incurring the risk in the first place, hopefully through sound design and appropriate forethought, a sense in which it is used by writers such as Gibson (2015)
- It is used in the more traditional sense of *risk reduction* – in other words avoiding the consequences of the risk should it occur (Dill 2013)
- The term is also used to indicate the advantages that risk can bring, with risk mitigation ultimately meaning *risk harnessing* – the classic example being the use of MOOCs for credit. (Ng & McRae 2017).

The question that needs to be discussed (as will be done in Chapters 7 and 8) is whether course accreditation is an exercise in risk mitigation in any or all of these senses. This in turn leads into the question of regulatory risk, and the role of university lawyers as institutional gatekeepers for risk management (Cameron & Klopper 2015).

### 3.3.5 Regulatory Risk

Regulatory risk involves any breach of the Law, and this would appear, at least in the current regulatory environment, to be the danger most feared by Australian universities (Lee Dow & Braithwaite 2013). Australian universities are required to adhere to a mass of legislation – State and local, as well as Commonwealth – and must also do everything possible to avoid litigation from the public or government (Davis 2017). It is for this reason that all Australian universities now have an increasingly large in-house legal unit (NSW Ombudsman 2017).

The role and responsibility of legal units varies greatly from one Australian university to another, as does their structure and reporting line. In certain cases, the unit is kept separate (and hence independent) from the remainder of the university and reports direct to the governing Council or the Vice Chancellor, almost as a private legal service. In the majority of cases, however, the legal unit forms an integral part of the governance structure of the university, normally under the control of the Chief Operating Officer (*although position titles vary from one institution to another*).

The statement from the University of Tasmania (2018) legal unit perhaps best sums up the role of these bodies on Australian campuses

Legal Services is responsible for identifying and managing the University's legal risk through the provision of independent, sound and practical legal advice and services that support the University's educational, research, commercial and administrative functions.

The professional association of Australian university corporate lawyers is the (Australian) Society of University Lawyers, a body that now embraces virtually all of the legal units in Australian universities. The Society acts as a forum rather than a regulatory group and has no policy on the role of its members, much less on risk management in general. It is, however, highly interested in the danger of the Institutional or executive risk that may occur inadvertently through university activities.

### **3.3.6 Institutional compliance risk**

Discussion of institutional compliance risk cannot be divorced from the more general role of legal units in Australian universities. One of the difficulties faced by these units is uncertainty about their responsibility for risk management – in other words can (or should) corporate lawyers alert their employer if they suspect the presence of potential risks, even if these have yet to eventuate and may never do so? (All legal units in Australian universities operate within a set of standing instructions prepared for them by the university– the equivalent of the instructions to lawyers from their clients. It may be important to note that few of these instructions make any mention of risk management. (Cameron & Klopper 2015).

This uncertainty is compounded by the fact that many universities see their legal unit as an advisory and response group only, and this means that as a general rule corporate lawyers tend to become involved with issues only when a matter is referred to them and are unable (either through the pressure of work or the restraint placed upon their office by the university) to become proactive in the avoidance of risk (Christopher & Sarens 2015).

Cameron expands on this in a subsequent paper on university lawyers (shortened for space);

The risk management framework of university lawyers addresses two categories of legal risk ....program and contract risk. University lawyers manage program risks associated with student disability and medical conditions, workplace hazards and student misuse of social media. Nevertheless university lawyers are predominantly engaged in managing contract risks .....these being the contractual terms involving the host organisation, university and/or student as well as the contract practices of the discipline. Strategic, organisational and stakeholder factors may influence the risk management framework of university lawyers. Strategic factors relate to the goals and objectives of the university, organisational factors are associated with the day-to-day operation of the legal office, and stakeholder factors are attributable to the host organisation (external) .....on behalf of the university (internal). The factors are subsequently conceptualised as risks to demonstrate the strategic, operational and reputational risks that university lawyers may encounter and manage which, in addition to the legal risks, may affect the ability of the university to achieve its goals....

(Cameron 2015)

The fact that university lawyers tend to concentrate so narrowly means that much of the responsibility for the identification of risk falls upon the University Secretary (the person called upon under the Companies Act 2012 to represent the university in business matters) rather than on the staff in the legal unit. (Association of University Secretaries 2013). This is particularly the case with compliance and reputational risk (Braithwaite 2012) – areas of hypothetical speculation that lawyers are loath to touch.

This creates a tension, particularly when the University Secretary is someone other than the Chief Operating Officer (a title with specific meaning in Australian Higher Education Management that has now replaced the obsolete term “Registrar”) as occurs in most Australian universities. This tension may be further influenced by the fact that the majority of Chief Operating Officers in Australian universities tend to come from a Finance or Accounting background, while quite a number of the current University Secretaries come with Management, Human Resources or Legal qualifications, and take a different view on risk (Baird 2014). The issue comes to a head should there be a risk of compliance failure, with those from a financial background trying to avoid this at all cost (unless there is a clear case for cost saving or a positive return on investment) as compliance failure suggests incompetence by those from this discipline, similar, perhaps to failure to submit a tax return. Practitioners from other areas normally allow greater flexibility in accepting risks if this leads to improved efficiency (Marti 2008).

The ultimate question, however, is who should be responsible for compliance (and ultimately for all risk in an Australian university) – the Chief Operating Officer who may be called upon to identify risk before it happens, the University Secretary who may be responsible for justifying it to outside bodies including regulators, or the Legal Unit, which may be needed to get the university out of its difficulties? As will be shown in Chapter 8, this becomes extremely important for any discussion of the place of risk in course accreditation.

### **3.3.7 Social and Political Risk**

Compliance risk gives rise to risks in other spheres, particularly social and political risk. (Baldwin, Hutter & Rothstein 2012).

Any successful action against a university for non-compliance, even the most trivial, carries the risk of bad publicity and a loss of confidence from the public and sponsors (Braithwaite 2017). This is avoided like a plague by Australian universities, as a loss of public confidence – a measure of support and approbation from students, sponsors and funding agencies – may well lead to downturn or closure (Hunsaker & Thomas 2014). The vast majority of universities try to avoid this by quarantining compliance errors to particular groups or units and then reporting them as the failing of that particular body rather than the institution as a whole (Ethics and Compliance Certification Institute 2016 – a body strongly opposed to this practice). For this reason, most Australian universities now maintain a Compliance Obligations Register (for example - University of Newcastle 2013) that lists the legal obligations of the university and the person or unit responsible for their discharge. (Another more detailed example is the *Compliance Management Framework Breach Reporting Procedures* of the University of the Sunshine Coast (2018) which provides protection for whistle-blowers reporting compliance failure. Similar policies exist – or are in preparation – in the vast majority of Australian universities)

Compliance is not the only side of this issue, however, and perhaps a greater risk to public confidence is failure to deliver what might be reasonably expected, almost always because too much may have been promised or implied. This risk can be avoided through the effective use of Business Intelligence (Guster & Brown 2012) and the exercise of tight control over the marketing arm of the university (Litten 1980). The loss of public confidence can also be slowed by the existence of procedures that are followed consistently by the institution, and which are brought continually to the attention of the public (Lewis 2014). No one expects a university to be right on every occasion, but few expect it to fail regularly either and great stability is provided by the existence of effective protocols (JCHE 2007).

As will be explained in Chapter 8, the maintenance of public confidence forms a vital part of the course accreditation process in Australian universities, and this – being too serious to be left solely to staff - is protected across the sector through effective protocols

### 3.3.8 Other Risks

While there are many risks to which universities throughout the world are exposed, there are three in particular that may endanger public confidence:

- Inconsistency – where a university may indicate a particular course of action but then be seen to change its mind. This lack of consistency may well suggest a lack of direction, a failure of management, or be seen as a sign of internal conflict (Bligh, Thomas & McNay 1999)
- Undue haste (or conversely unnecessary delay) – may also be seen as a sign that a university does not know what it is doing, or worse, may not even be aware of its anomalous behaviour. Undue haste often involves decisions made on the fly, while unnecessary delay may well be seen as evidence of lack of commitment or a failure of planning (Wileman 2007)
- Excessive talk without a corresponding action – Universities that make constant announcements but do nothing to bring these things to fruition will always have difficulty in retaining public favour. The situation is made worse when these announcements are accompanied by self-aggrandizing statements praising the institution and telling the world how good or how successful it happens to be, when the world itself knows otherwise. (Williams & Olson 2009).

As will be explained in Chapter 8, virtually all of these factors play a part in course accreditation procedures.

## 3.4 The Appreciation of Risk Management

### 3.4.1 Risk identification and anticipation

It is one thing to acknowledge the existence of risk and quite another to do something about it (Bernstein 1998). This section will discuss the appreciation of risk in Australian universities - in other words, how seriously Australian universities view the various types of risk that are encountered in their daily operation and how these impact on the continuing work of the institution

As mentioned previously, there are many types of risk, each of which may be handled differently.

### 3.4.2 Preventable and Avoidable Risks

Preventable and avoidable risks are those that a university can foresee, and which it can take reasonable steps to counter. These include the possibility of harm or accident to persons or property, the risk of financial misappropriation, safety failures or other acts that may lead to litigation on the grounds of negligence (Sum & Saad 2017). The majority of these are included under the broad heading of Occupational/Workplace Health and Safety (OH&S) and are taken very seriously. Where a risk is foreseeable most universities attempt to cover themselves through internal control, external insurance or the taking of steps to seek legal immunity (Kaplin & Lee 2013). There are normally three avenues of relief available to Australian universities should their internal control (i.e., the institution's rules and regulations) prove insufficient. This is known as risk transfer:

- Formal insurance of various types, normally provided by an external underwriter that supplies protection for an agreed cost and period against specified risks. Most Australian universities divide their formal insurance into three types – physical insurance; disruption insurance and officers' protection insurance and these may well be funded from different cost centres (AURIMS 2017).
- Indemnity (or Hold Harmless) agreements whereby an aggrieved party agrees to seek no redress from the institution should a particular outcome arise (Courtney 2014). These are essentially one-sided agreements where one party is exposed to litigation rather than the other, such as when a student wishes to conduct fieldwork in a conflict zone against the advice of their university (University of Adelaide 2018)
- Releases (or waivers) in which the parties agree to take no action against each other should a particular outcome ensue (Malveaux 2016). These are normally agreements between equals, where either could sue the other, such as an agreement with a publisher that a university will not contest copyright provided full acknowledgement is given to the institution (Legal Services – University of Tasmania 2018).

### 3.4.3 Unforeseeable Risk, Insurance and Contingency Planning

Unforeseeable risk (as the name implies) is risk that a prudent person cannot be expected to anticipate, and the term is used largely to distinguish foreseeable risk (which might have been anticipated) from all others, no matter how remote. Unforeseeable risk is unpredictable, and hence it is much harder to seek the protection of formal insurance. (Some insurance may still be available as in an all risks motor vehicle policy but there are too many variables for this form of insurance to cover all aspects of Higher Education (Klinksiek 2016).

The University Risk Management and Insurance Association (URMIA), a body heavily involved with Higher Education in the United States, divides risk into 23 categories, and provide an inventory that lists 290 risk areas. For each area the spreadsheet lists a range of factors that may make the outcome more or less risky according to the local environment (URMIA 2015)

As a similar chart has yet to be developed for Australia, the *URMIA Risk Inventory* is used increasingly by Australian universities and their insurers in planning risk management strategies (particularly for occupational and environmental issues) although there are a number of local variations to accommodate the differences between US legislation and its Australian counterpart. (Viner 2016). The categories used in the URMIA Risk Inventory (with Australian variations added) are listed below. (Based on Klinksiek 2016 and on additional information provided at interview by Australian university risk managers.)

- **Affiliated entities**: independent academic organizations, student and alumni organizations, commercial partners on campus including VET and community colleges
- **Athletics and off campus activities**: Conferences, rented rooms and facilities, graduation ceremonies, open days, injuries and resulting medical care to players or spectators, sporting body compliance, spectator control, terrorism and crowded place incidents, team trademarks and licensing, team behaviour off field, issues arising from spectator disappointment such as cancellations due to weather
- **Brand and reputation**: academic excellence, academic freedom, alumni relations, constitutional challenges, free speech and expression, relationship with key benefactors and supporters
- **Business continuity and emergency planning**: breadth and currency, emergency response, international activity, (including contact details for exchange students while overseas), coordination with local emergency services, registration and compliance with the Australian Inter-Service Agency Incident Management System (AIIMS) – a government authority with which all universities must now be registered, and a further source of risk, although for security reasons little mention is made of this, even to university staff
- **Community**: economic development, use of institutional facilities by community members and organizations, service bodies and cultural contributions to local society
- **Competition**: handling diverse educational providers, college rankings and public perception of the institution
- **Conflict of interest or commitment**: internal competition between staff or units for scarce resources
- **Demographics**: Falling enrolments or high attrition rates), increasing dependence on international students, housing and student accommodation, parking and transport
- **Enterprise risk management**: effective program design, assessment and mitigation plans
- **Financial**: Budgeting, capital sufficiency, construction management, contracts, deferred maintenance, local and national economic conditions, energy and water costs and availability, fund raising, grant procurement, investment management, tuition fees, staff deferred liabilities (superannuation), insurance, taxation, auditing and legal reporting requirements
- **Gender-related issues**: equality, sexual harassment and assault, LGBTQI issues
- **Governance and institutional management**: Affordability, authorised activities, competency based education, institutional culture, decentralised activity, educational technology, leadership and strategic planning, shared governance and academic freedom, maintaining registration by meeting all requirements of TEQSA and other government agencies
- **Government support of higher education**: financial aid, government financial support, sponsored research, regulators such as TEQSA
- **Human resources**: code of conduct, diversity, employee productivity, employee benefit management, employee rehabilitation, workplace safety, relations with unions and staff professional bodies, wage and hour compliance
- **Intellectual property**: legal compliance and defence, copyright, patents, foregone opportunities
- **International**: Asset protection, competition, compliance with off shore requirements, emergency response, ethical violations, global trends, locality risk, change in host government policy, tariff and trade agreements
- **Local, state and federal regulation**: Compliance with all legal requirements, timeliness of returns and reporting, compliance with Defence Procurement Policies

- **Operations:** Auxiliary businesses such as bookstores and publishing, library and art collections, online learning, outsourcing, security of premises, student travel and transport, student health services
- **Property:** physical damage, depreciation and obsolescence, inadequate design, inappropriate naming of buildings, monuments and statues, environmental issues (including noxious weeds) water management, fences and boundaries
- **Public safety:** terrorism and related incidents, building access and security, crime, compliance with the requirements of the Australian National Security Agency, minors and similar on campus, including Australian Child Protection Legislation
- **Internal Safety:** fire and life security, road hazards, signage and parking, laboratory safety, catering, pandemics, research hazards, inadequate or inappropriate staff and student training, use of emergency equipment (fire extinguishers, etc) on campus
- **Students:** academic standards and graduation rates, access and disability requirements, admission and enrolment, alcohol and substance abuse, at-risk students (including student suicide), campus predators (including bullying), financial scams, contract essays and other forms of cheating
- **Technology:** Access, relevance, obsolescence, equipment failure, replacement strategies, mobile devices, performance capacity, hacking, security and cyber liability, use of technology for inappropriate purposes.

It will be noted that comparatively few of these categories can be covered adequately by formal insurance – particularly those associated with the danger of bad publicity after the event. For this reason, most Australian universities when faced with unforeseeable risk develop contingency plans to be brought into effect should the circumstances require or if spokespeople are needed (Fest & Bretag 2005).

As shown in Chapter 9, this has a significant knock on effect on course accreditation procedures.

### 3.4.4 Risk Mitigation

Risk mitigation is slightly different from risk avoidance. In the latter there is an attempt to avoid any risk at all, while in the former it is a matter of minimizing the unfavourable consequences if they occur. Few Australian universities practise risk avoidance, believing that risk cannot be avoided if there is to be improvement and innovation (Hunsaker & Thomas 2014) but all engage in risk mitigation (Baird 2013).

Australian universities try to mitigate risk in the following ways (taken largely from Baccarini & Melville 2011):

- By clearly defining the aims, limits and end point of a particular activity so as to identify possible risks arising from that activity. [Thus, students must complete a particular award within a specified time, and so on]
- By determining the cost, and then ensuring that adequate resources will be available throughout the life of the project
- By undertaking an environmental impact study of everything that may be affected positively or negatively by the activity, and subsequently taking appropriate measures to minimise harm or disruption throughout its life
- By realising that once a decision is announced it becomes irrevocable, irrespective of the circumstances, and that embarrassment will arise if what is promised is not delivered.

- By identifying the place and manner in which the activity should be disclosed to the public. Until this is done all details need to be kept as confidential as possible, thus avoiding criticism should it be imprudent to proceed
- By clearly explaining what is intended, and the expected outcome. While it is vital that this information be provided to affected parties, it is equally important to ensure that others who may become involved (or may suffer indirect benefit, harm or inconvenience) at some later stage are aware of this intention and are willing to accept the outcome
- By identifying and monitoring the external factors that may impact on the activity at any stage of its life
- By preparing alternatives should it be necessary to withdraw at any stage, with appropriate transition arrangements for those involved
- By developing an appropriate termination strategy for concluding the activity, even if the intent is to keep it ongoing for an indefinite period. (This needs to be done at the commencement of the activity, not at its end). The smooth closure of an activity may be even more important - and carry far greater risks - than any that occur at its initiation (Wootton 2016).

Few of the Directors of Risk in Australian universities are required to engage in long term risk mitigation. Most of their work is immediate, often in response to a problem that has already emerged, such as tracking misappropriation or preventing injuries caused by lack of maintenance, rather than events that might – or might not - occur in the future. As a result of this almost all long-term risk mitigation originates from the planning units of universities rather than risk directorates (Mikol 1998). Again, this has a significant effect on the course accreditation procedures of most universities.

### 3.4.5 Regulatory risk

Regulatory risk presents its own difficulties. Regulatory risk – the danger of failure to observe statutory requirements - is largely operational, and depends for its management on co-operation between two independent groups – those employees dealing directly with staff or students and those answerable for the behaviour of these employees, with the second group attempting to maintain control over the first through policies and guidelines.

[It is important to distinguish between “Regulatory Risk” and “Compliance Risk” as these are normally handled in different ways by a university. **Compliance risk**, which is discussed in an earlier section, concerns a failure to comply with specific items of legislation, such as the Educational Services to Overseas Students Act 2000 or the National Code 2018. This risk is avoided through adherence to institutional practice and procedure – it is unnecessary for staff to be familiar with the wording of the legislation itself - to ensure that requirements are met. **Regulatory risk**, on the other hand, involves a breach of any legislation (as opposed to the transgression of a specific piece of legislation), and normally requires interpretation to determine whether a particular action or response is in accord with the Law. Failure by staff to keep student details confidential (an action contrary by a series of Acts and Regulations) would be an example of a “regulatory risk”, and it may take an expert to determine just which Act or Regulation has been broken. Failure to report the non-attendance of international students, on the other hand would be considered a “compliance risk”, as this is the requirement of a specific piece of legislation. Compliance risks are encountered daily, and their handling is routine and repetitive. Regulatory risks occur less frequently and require greater judgement but may have far more serious consequences (Phillips/KPA 2012)].

Universities handle regulatory and compliance risk in three ways:

- Staff are made aware of the risks in their area of responsibility as early as possible (preferably during their induction) and are kept up to date with any change as it may occur
- Compliance Risk is avoided by a strict adherence to the procedures and protocols of the university. Regulatory risk, however, is normally managed by peer monitoring – when in doubt, ask what others think about it and be guided by their response (Watson 2000)
- The avoidance of compliance risk is made habitual, to the point where it becomes second nature and is implemented without conscious thought. Regulatory risk, on the other hand, can only be controlled by conscious decision making (Cassidy 2000)

Compliance and regulatory risk occur in many areas of Australian Higher Education and is generally uninsurable – largely because insurance becomes inoperable when servants fail to adhere to their master’s instructions. As will be explained in Chapter 8 this master/servant relationship becomes extremely important in course accreditation, and the majority of universities have instituted a range of strategies to control it (Forsyth 2012).

### **3.4.6 Institutional and/or managerial risk**

Institutional risk involves a permanent change in institutional direction, often caused by a change in executives. This is not the same as the risk of inconsistency mentioned earlier which tends to result from indifference or simply a change of mind. In this case the change is intended and deliberate as a new broom sweeps through an institution. The impact of institutional or managerial risk depends to a large extent on the personality of the leader and the speed with which that person wants reform. The effect, however, can be dramatic, with major change in the organization and gross instability if the institution takes a united approach and fights back. (Scott, Coates & Anderson 2008)

Power is rarely in the hands of a single individual in the academy. While there may be powerful figures, there are few cases in which this gives unilateral control. Most actions require more than one person for their implementation and if demands are overwhelming the outcome desired may become impossible through passive resistance and a lack of co-operation (Wehlburg 2001). Most decisions in a university are made in a collegiate manner, generally through a board or committee. To prevent any member of these bodies from becoming too powerful, most committees have a rotating membership, with a certain number of members retiring at regular intervals. Those who remain give continuity to the committee, but this regular rotation restricts the power of individuals (Groselocke & King 2000).

Virtually all decisions in a university are subject to appeal, and an aggrieved person or group can normally take their concerns to a higher tribunal for review. The fact that everyone in a university – including the University Council - has a superior (in the Australian context the ultimate superior is the state governor on behalf of the Queen) limits arbitrary action. (Seymour 2002). The difficulty, unfortunately, is that institutional or managerial risk can take a long time to be resolved, and during this period there can be great unhappiness as well as enormous instability. To avoid this, the majority of universities (both in Australia and overseas) try to maintain relationships by attaching blame to an office, rather than the person who holds that office, so that personalities don’t become involved (Smith 2015).

Institutional and managerial risk is seldom mentioned in Higher Education documentation (Deeg 2016) but as explained in Chapter 8 remains a ghost in the background when it comes to course accreditation.

### **3.4.7 Social and political risk**

While it is traditional in Business to handle social and political risk through favourable publicity and good public relations - often after the event - this is rarely the way in which risks of this type are addressed in Higher Education. Universities prefer to avoid the censure of the public from the

beginning rather than attempt to resolve the matter after displeasure has been incurred. Indeed, the fragmentation of most universities, where blame is normally directed towards component units rather than the institution as a whole, makes any attempt at centralised positive publicity questionable if not ridiculous (Jones 2011). [Thus, should the university be blamed if lecturers are late for class, and should it apologise for their laxity if this is due to circumstances beyond the control of the institution?]

Universities avoid this problem through a range of strategies (drawn largely from Kelty & Bunten 2017):

- In the majority of cases universities go to inordinate lengths to warn affected parties of their intentions in advance and apologise in anticipation for any inconvenience caused. This may be to their disadvantage if the foreshadowed activity fails to eventuate or if the outcome differs from what is expected. (Archibald & Feldman 2017)
- As a general rule, universities – unlike their counterparts in business - try to provide as much information as possible even if this means alerting competitors and risking market opportunity (European Commission 2014)
- Universities try to deal directly with the community rather than simply with community leaders. This aspect – which is generally in contrast to the practice of business and government - is particularly important when local sensitivities (such as indigenous or religious issues) may be roused (Maurasse 2001)
- Universities – unlike the business community - see nothing wrong with apologising when things go wrong, with the apology coming from the institution itself rather than from a particular individual. This contrasts with the role of Chief Executive Officers in other fields, the majority of whom are required to apologise personally for corporate failure – and then quite often to resign (Friedman 2006).

Social and Political Risk is never far distant from Higher Education executives (Astin & Astin 2000) even if mentioned only infrequently. This is particularly the case with activities involving students and benefactors, both of whom are extremely sensitive to community criticism (Singh 2014). As will be explained in Chapter 8 the avoidance of risk in this area is also a core function of course approval procedures.

#### **3.4.8 Other risks (including financial risk)**

While the way in which universities handle risk in other areas (including Finance) are not radically different from the Business community, there are three factors that distinguish Higher Education from its commercial counterparts, each of which plays a major role in risk management and avoidance:

- While universities are expected to be entrepreneurial and to supplement their funds where possible from internally generated activities, there is rarely an expectation that Australian universities should make a profit (apart, perhaps, from the few for-profit tertiary providers in this country) (Warburton 2017). The vast majority of Australian universities are *charities* and, as such, there is every expectation – as well as the necessity - that the institution should appear to run at a loss and require constant supplementation from external sources (Flinders University 2017).

This in turn means that few Australian universities can risk a reduction in funding through being seen as profitable in their own right and must constantly plead poor despite being rich in assets, even if few of these assets can be liquidated (Universities Australia 2017). The vast

majority of Australian universities are comparatively well off, and as their financial stability is underwritten by the government they might otherwise be regarded in the commercial world as blue chip investments, but they must never allow themselves to be presented to the public in that manner (Grant Thornton Investment Advisors 2016).

- Universities, unlike other corporate bodies, have great difficulty in identifying their core business (Barnett 2000). While the public may most closely associate these institutions with teaching, or academics with research, the core business of a modern university often remains obscure, even to those within its walls, including those required to manage it (Stachowicz-Stanusch & Mangia 2016).
- The fact that there is no clear or universal acceptance of the core business of a university exposes tertiary providers to numerous risks, simply because a university may be unable to take up or discard anything without attracting public criticism, irrespective of whether the item to be accepted or abandoned adds any value to the institution or not (Barcan 2013).

This distinction from Business evokes a different response to risk, and it may be unfortunate that much of the risk management literature (particularly that focusing on Enterprise Risk Management) is written from a Business perspective. Businesses are expected to take risks, charitable organizations are not (Young 2009). The question then becomes “How should a modern university view itself – as a business (a position favoured by many administrators) or as a charity (a position held by many within the academic community)? The difficulty is that so many in society feel that universities should operate as a business but behave as a charity (Salmon 2011).

## **3.5 The human element in higher education risk management**

### **3.5.1 Risk as a Human Perception**

Risk has little existence beyond the human mind because – as far as we know - only humans can anticipate threats and those possibilities that are not present at the moment, but which may emerge in the future (Breen 2013). This means that risk is essentially a human construct rather than something that can exist independently in the physical world (Trimpop 1994). While it is realised that there may be disagreement with this statement, the view taken throughout this document (as endorsed by Sjoberg, Moen & Rundmo 2004 and many others) is that risk exists solely in the mind and that its personification as an independent entity in the external world is an illusion.

It follows therefore, that if risk a product of the human mind it should be closely linked to emotion, as in the end one’s feelings are used to estimate both the probability and magnitude of risk (Gutnik, Hakimzada, Yoskowshi & Patel 2006). While this may be true of individuals it is believed to apply equally to groups, as groups represent the collective views and emotions of the individuals that comprise them (Lupton 2013).

If risk is an individual matter, groups - such as university committees - can only become aware of their members’ feelings if there is clear communication between them. The existence of risk (in so far as it can be said to *exist* if, as claimed, it remains more than a mental artefact) is not diminished in the mind of each individual if the fear remains unexpressed – it is simply that it remains unshared with others. Worse, this failure to communicate may cause the person to worry and others to speculate, thus making the danger worse (Phillips 2014).

Where risk is acknowledged but poorly communicated, the normal response is caution. The group remains aware that action is needed but hesitates to take it (Sukel 2016). This has major implications in a university, particularly where decisions are delayed by the collegiate structure of the academy. It is often preferable to make no decision in a university rather than a hasty or wrong one (Alexander & Alexander 2011).

### 3.5.2 Risk versus caution in universities

There is a clear distinction between risk and caution with the first indicating a perception, while the second reflects one's attitude towards it. This is sometimes overlooked in Higher Education where hesitation (the outcome) is sometimes confused with the cause (risk) (Adams 2008). The confusion between caution and risk becomes significant in Higher Education risk management, with caution sometimes being used as a means of avoiding risk rather than a vessel for dealing with the risk itself – an often easier option (Huber 2011).

The majority of overseas universities – as distinct from Australia - avoid this confusion by asking “Can we be sued?” or alternatively, “How might this affect our bottom line?” and tend to be more practical than theoretic than their Australian counterparts (Pauken 2011). European universities in particular tend to be more proactive by adopting a devil's advocate position and asking, “What will happen if we don't address this?” thereby overcoming any suggestion of laziness or indifference through being seen to at least take some action (Kwick 2012). Universities in the United States remain conscious of the litigious world within which they operate and constantly raise the question “Should we brief our lawyers?” when risk occurs (Engel 2016). Australian universities on the other hand – perhaps because of their traditionally close relationship with government – tend to address the issue of risk versus caution on political lines, asking firstly “How will the government of the day respond if we do (or fail to do) something?” and then using caution as an excuse for delay while further advice is sought (Vidivich 2012). [A notable example is the introduction of the University of Melbourne model of undergraduate teaching, a transition that carried many risks when first suggested, not least of which was the opposition of the Victorian government, but which survived through a policy of caution that placed the risks in perspective through the passage of time – as well as an opportune election and a supportive Commonwealth (Davis 2010)].

The avoidance of risk through caution is deeply embedded in the course accreditation procedures of most Australian universities. While this may result in slow progress, often to the frustration of staff, it also avoids the risk of hasty decisions (Kinash, Herbert & Lawson 2014).

### 3.5.3 Factors encouraging or discouraging risk

Several factors encourage or discourage universities from taking risks. On the one hand there is much to be lost through carelessness, indifference, disengagement or a premature cancellation of programs. On the other hand, even more can be lost if universities fail to keep pace with emerging trends and press on regardless into obsolescence and obscurity (van Rooijan 2016). The factors encouraging or discouraging risk in Australian universities can be readily identified (taken largely from Newman, Couturier & Scurry 2004):

- The Australian university community is a close-knit group whose members learn from the experiences of each other. If one institution suffers through risk (or conversely gains advantage by taking risks) others notice, and then profit from their example (Heaney 2009)
- Relations with the Commonwealth Government are heavily influenced by precedent. If it can be shown that the government previously supported a university in a risky venture (or rescued it when it went too far) others may feel entitled to claim similar support in the name of equity. (Williams and Pillai 2011). This is particularly the case where local issues are involved, such as institutions in marginal seats or regional districts (Davis 2017).
- Australian universities are also held to account by the media as instruments of government, similar in many respects to the public school system, even though there are few parallels between the two (Groenewegen 2009). Unlike the situation overseas (where universities normally attract little interest beyond their immediate stakeholders, scandals excepted),

Australian universities are closely monitored by the press and public for political purposes, and can be used as a stick to beat governments (Morris 2018), with any example of unusual or risky behaviour noted. This in turn causes Australian Governments (both State and Commonwealth) to discourage Higher Education from taking risks.

- Australian universities have few private benefactors and are maintained largely by the taxpayer. As mentioned in the previous paragraph, this encourages public scrutiny and discourages risk. To counter any unfavourable publicity that might arise, Australian universities are constantly engaged in a public relations campaign, usually promoting new discoveries and research initiatives, often by inference suggesting that similar value attaches to their core business of teaching and learning.
- Most universities encourage their staff to take risks, particularly in research, but where issues are controversial may refrain from publicising the outcome.
- Risk taking in Australian universities is more often curtailed by bureaucracy than by edict (Melleuish 2015). (In other words, risky behaviour is rarely forbidden outright – the system simply takes so long to give approval or to make resources available that those seeking to take risks become frustrated, lose interest and engage in something less controversial – Evans 2018) This is particularly the case where students and teaching are involved (Evans & Nation 2012). [An example is the University of Newcastle, where before any activity – even a series of classroom lectures – can be conducted a Risk Assessment Form and a Safety Review Form must be completed. (University of Newcastle 2017). Because it takes so long to get approval to take risks (which is done as part of the course accreditation process at the University of Newcastle and elsewhere) there is every incentive not to suggest anything risky in the first place, and this can stultify the institution (Duke 2017).]

The fact that Australian universities are conservative in their approach to risk becomes important in the course approvals procedure of most Australian institutions. As will be noted in Chapter 8, however, this applies to foreseeable rather than inadvertent risk against which other measures must be taken.

### **3.5.4 Learning from past experience of risk**

Universities have long memories for embarrassing incidents and try to avoid any repetition of past mistakes (Plano 1991). This biases perception and suggests in turn that most Australian institutions are heavily dependent on what has occurred previously as opposed to what might happen in the future. As a result, most universities look to the past for the identification of risk, rather than the present where the circumstances may be different (Smith 2005).

All Australian universities are required by TEQSA to maintain a Risk Register in which the most probable (or most dangerous) risks are identified and countered (TEQSA 2016). The difficulty is that these risks are self-identified by the institution, and as a general rule reflect experiences that have arisen within the personal knowledge of members. (“TEQSA requires that a register be kept. It does not monitor its content” – Informant 12). Matters that have not been experienced previously are less likely to be noted in the Risk Register (Probert 2015). While the researcher was shown occasional examples of risk registers these were viewed in confidence and their content - most follow a prescribed format - will not be reported. As most interviews were conducted by phone there was less opportunity for the physical inspection of these files (virtually all are maintained electronically) in other universities.

There are three problems with the subjective identification of risk, particularly where it is dependent on experience (Based largely on Aven 2016):

- Risk is viewed from a personal rather than an institutional perspective. Thus the risk taker thinks unconsciously about the consequences to themselves in the first instance rather than the corporation and its members. This in turn determines the priority to be given to the avoidance of particular types of risk,
- Risk is categorised by its effect on past outcomes rather than any hazard it may present to current operations. Thus, risk takers may fail to recognize the effect of new technology, the globalization of the industry or changing consumer demands.
- There is often disagreement about the probability or consequence of risk. This is particularly important in cases where risks are assessed in a collegiate manner, as in most universities. This may give rise to pseudo risks and other phantoms, where action is taken to forestall risks that have no substance, while others of a far more serious nature are ignored.

### **3.5.5 The shield of anonymity in Higher Education risk management**

In the vast majority of cases decisions involving risk in Higher Education are made in a collective manner by a group or committee. This in turn provides protection for individuals should the outcome prove unfavourable and may encourage greater risk taking than if blame could be sheeted home to an individual (Bougheas, Neiboer & Sefton 2013).

The danger, however, is that group discussion can as easily give rise to pseudo risks and other phantoms. A pseudo-risk is a risk that has real existence but whose importance or consequence has been greatly exaggerated. A phantom is a risk that has no foundation.

## **3.6 Pseudo-risks and phantoms**

### **3.6.1 Risk as a stick to frighten people**

Pseudo-Risks and Phantoms are most commonly used as a means for scaring people and hence shaping their subsequent behaviour, particularly by fear mongers. The danger of this strategy is that the risk will become unbelievable if taken to excess, similar to the child who cried “wolf” when snarled at by a tiny pup, and as such must be blended with truth and used with discretion (Gardner 2008).

Pseudo-risk is used in a more subtle way in Higher Education, with the outcome implied but rarely stated in as many words. This in turn makes it more potent as, by a process of cognitive dissonance, each individual feels threatened in their own way and responds accordingly (Brynin 2013). This in turn makes it both a flexible and dangerous tool (Eckwert & Zilcha 2015).

The pseudo-risk that is most current in Australian Higher Education is the threat of TEQSA deregistration – an action that is unlikely in the case of the public universities and, provided the institution was allowed to keep operating “under administration” – the standard procedure with failed public institutions - would have little effect on staff. Despite this, it would appear from the remarks of informants to be an instrument used frequently and indiscriminately by middle management as a means to improve staff performance.

The danger is that pseudo-risks and phantom will (in a manner similar to Gresham’s Law) distract staff from risks that are immediate and far more damaging. Thus, there is little risk of universities losing their licence to operate, but a far greater one of losing their overseas students. Despite this, the threat of deregistration – and hence the probability of job losses – is still used to bolster obedience on the part of institutional employees (Price, Waterhouse Cooper 2016), a factor of significance for regulators (who have no wish to be seen as bogymen) as well as the Government (TEQSA 2018).

### **3.6.2 Risk as a means for gaining institutional unity**

On a more positive note the threat of pseudo-risk can be used as a means for gaining institutional unity, especially where there is little else to hold the staff together. This was particularly the case in certain of the so called Dawkins Universities (where former Colleges of Advanced Education were made into universities as part of the Dawkins reform of the 1980s). There was little in common between many of their predecessor institutions, and these proto-bodies were often held together simply by the threat of amalgamation with longer established universities (with an obvious risk to jobs and status) if staff failed to perform (Hutchinson 2013). Nor were the older universities averse to the use of pseudo-risk either, with a constant threat to consolidate or outsource administrative functions unless savings were made, a move that brought the interests of many quite separate administrative units closer together and promoted institutional solidarity, if not efficiency (Nichols 2017).

The difficulty is that pseudo-risk has been used increasingly to create distraction in Australian universities, particularly when unpopular decisions need to be implemented (Bostock 2002). This has blunted its effectiveness and damaged the confidence that staff place in managers (Commonwealth Ombudsman 2016). Despite this, it remains a favoured instrument of Australian politicians (Talfaga 2018).

### **3.6.3 Risk as a means for achieving corporate aims**

Risk can also be used as a means for achieving corporate aims, largely by means of a challenge, similar to the challenge given to a sporting team. A university, for example, may wish to achieve a particular outcome, with achievement representing success while failure could cause a considerable loss of face to staff. The staff work together and the desired outcome is achieved in a manner that might not be possible by other means (Alfred 2006).

### **3.6.4 Fear management versus risk management**

There is sometimes confusion in Higher Education between fear management and risk management. The first is essentially a person centred activity; people are frightened and need reassurance. The second resolves the cause of their panic and involves addressing the source of their fear (Heng 2006).

The confusion between fear management and risk management may cause a university to take inappropriate action, particularly at a time of restructure, where staff efficiency may drop while the institution seeks to strengthen its place in the sector. This can also occur beneath the surface in course accreditation, where institutions may make every attempt to encourage new initiatives while at the same time seeking to reassure staff that existing jobs are safe. As will be explained in Chapter 8, the compromise needed to bridge these aims is frequently incorporated into course approval procedures.

### **3.6.5 Examples of historic fears that proved unrealistic**

Several instances have occurred in Australian higher education with fears that were subsequently shown to be unrealistic (and in which fear was confused - indeed compounded - with risk).

- The passage of the Australian National University Bill in 1946, which many feared would make all other universities (such as the University of Sydney and the University of Melbourne) undergraduate only
- The Murray Report of 1957, which many feared would bring an end to university autonomy
- The Whitlam Reforms of 1974, which many feared would destroy the system through providing free (and hence mass) higher education

- The Dawkins Report of 1988, and the closure or consolidation of the Colleges of Advanced Education
- The passage of the Tertiary Education Quality and Standards Agency Act in 2011 which some feared would bring an end to tertiary independence.

The key point is that fear is irrational while risk is not, and once fear enters the academy logical thinking (the means of providing risk avoidance, mitigation and management) is distorted by panic. Wise managers seek to keep both separate at all times (Cox 2009). Again, this has important implications for risk management in course accreditation.

### 3.7 The psychology of risk

#### 3.7.1 Risk as a value judgment

As previously noted, risk is essentially a state of mind that is specific to each individual, and which, as a mental concept forms an integral part of the judgment of each risk taken (Renn 2007).

The key factor is that risk represents a value judgment, and this is particularly the case when the matter involves an issue of intense personal value (Slimak & Dietz 2006). For this reason, virtually every action of an individual or group (a group is no more than a collective of individuals) involves a balance between risk and benefit. If the benefit is perceived as high, greater risk will be incurred. If the benefit is seen as insufficient, risk will be averted (Mullai 2008).

The fact that there are different values placed on risk becomes significant in Higher Education where risk takers come from a variety of backgrounds, disciplines, and experience, and then make collective decisions which involve the group as a whole. Thus, certain members may place a high value on one item while others place a similar value on others. This may lead to an agreement by compromise that all are obliged to follow but which satisfies no one (Gutmann & Thompson 2010).

#### 3 7.2 Errors in making judgments

Despite the fact that risk may be nothing more than a mental aberration its objectivity and reality is never doubted by the risk taker, who is often prepared to spend considerable time, energy and resources to avoid it, or to mitigate the consequences (Klein 2013). This in turn can lead to numerous errors of judgement, a number of which might be avoided through careful forethought (Shaban, Wyatt-Smith and Cumming 2004).

These errors include (based largely on Whipple 1984):

- Errors based on a poor (or incomplete) understanding of the issue – and hence of the risks involved
- Errors based on poor communication, and an inability to share feelings and concerns with others
- Errors based on false assumptions (*particularly the assumption that past solutions will prove equally effective in the future, despite the change in circumstances*)
- Errors based on haste or emotion without assessing the full implications
- Errors based on personal feelings and bias
- Errors based on peer pressure, where it is easier to yield to the views of peers rather than oppose them.

All of these can arise in course accreditation (as well as many other areas of Higher Education) but are generally avoided through an insistence on sound procedures that override emotion (Gaston 2014).

### **3.7.3 Higher Education as an exercise in risk stewardship**

*Risk stewardship* means accepting someone else's risk as one's own, even though one may gain nothing by doing so. Risk stewardship is common in all levels of education, from the pre-school assistant who watches children cross the road (and thereby accepts the responsibility for their safety) to the professor who endorses the work of a colleague. The "risk steward" does not simply "share" the risk with the risk taker but takes the blame upon themselves should something go wrong.

Risk stewardship in Higher Education normally involves each of the following (drawn largely from Perez & Ode 2013):

- The voluntary acceptance of risk by individuals on behalf of their institution. [The discussion here is about "individuals" here rather than "office holders". The responsibility remains with the individual after he or she has left office and does not pass to their successor in the same office, who may well denounce the actions of their predecessors]
- An inability to relinquish this responsibility once taken. This applies whether the risk eventuates or not
- Identification of the specific risks against which stewardship is taken. This identification is often included in the individual's statement of duties (such as "responsible for the performance of staff" and so on) with the acceptance of a position indicating an automatic acceptance of the risk
- Risk stewardship is highly dependent on the surrounding environment, with a change in environment likely to void the responsibility. This is particularly the case with force majeure events and incidents (Pratt, Pechar & Worgan 2004).

Risk stewardship forms an underlying component of the course accreditation process in all Australian universities. A group of people (an accreditation panel, academic board, and so on) agree to accept risks on behalf of the university from which they are unlikely to benefit personally, but which may seriously harm their careers and future employment prospects should they make mistakes.

### **3.7.4 Risk Stewardship as a legacy**

Universities have long been places where scholars learn their trade by following the example of their superiors. Thus, it is not simply knowledge that is taught but attitude as well (Fry, Ketteridge & Marshall 2009). Risk stewardship is ultimately an example of role modelling, with great responsibility placed on those who – like the captains of vessels at sea – make decisions on behalf of others (Selingo, Chheng & Clark 2017). ["Thus, a risk averse university may well produce risk averse graduates and vice versa" (Hartlaub & Schneider 2012).]

## **3.8 Summary**

Universities are places of risk, much of which is accepted and therefore passes unnoticed. Risk in itself is rarely dangerous. It is the response to risk – whether real or imagined – that is of critical concern in the management of the academy. The implications arising from this are discussed in the following chapter (Chapter 4).

<b>Preventable or Avoidable Risks within the control of the Institution</b>	<u>Primary strategy</u> - Reduced through foresight, sound policies, careful planning, staff instruction and prudent management <u>Backup Strategy</u> [ <i>In case the primary strategy fails</i> ] Effective insurance and sound contingency planning
Reputational	Avoided through responsible behaviour
Regulatory	Avoided through faithful compliance with instructions
Financial	Reduced through due diligence and firm control
Social and Political	Reduced through close liaison with the community
Internal Dissention and Disruption	Reduced through sound relationships with staff, students and stakeholders
<b>Preventable or Avoidable Risks outside the control of the Institution</b>	<u>Primary strategy</u> - Reduced through anticipatory monitoring of the environment, sound communication and rapid response to limit damage <u>Backup Strategy</u> Diversification and decentralisation, effective alliances, appropriate media and community support
Competitor	Reduced by a close monitoring of trends, markets planned obsolescence and the availability of superior alternatives
Economic	Reduced by hedging and a careful husbanding of resources
Human	Reduced through careful selection, set procedures and avoidance of over dependence on any one individual
<b>Unforeseeable and hence Unavoidable Risks</b>	<u>Primary Strategy</u> – Reduced through forward planning, close monitoring and institutional flexibility <u>Secondary Strategy</u> – Development of an ability to respond quickly, consistently and reliability to all threats & events at the lowest possible level

**Figure 3.2 The Risks faced by Educational Bodies and their Mitigation**

## Chapter 4 The Implications of Risk for Higher Education

The previous chapter dealt with the *presence* of risk in higher education and the response this generates in Australian universities. This chapter deals with the *implication* of risk for these institutions, leading eventually to the issue of risk in course accreditation procedures.

### 4.1 The Concept of Risk in Australian Higher Education

As mentioned in the previous chapter, risks of particular concern to universities in Australia include:

- Regulatory Risk
- Competitive Risk
- Social and Political Risk

all of which have to potential to cause serious problems for local providers. These things must be avoided, but at the same time this avoidance must not be allowed to disrupt the normal activity and smooth working of the institution and must be handled “behind the scenes” as much as possible (Scott, Coates and Anderson 2008). The fact that many of these things require concealment suggests that there are underlying factors behind risk to which Australian universities are particularly sensitive.

#### 4.1.1 Sensitivities in Australian higher education

Australian universities are sometimes seen as hard-shelled creatures that are impervious to external pressure. This is a gross misperception as there are numerous areas that are exposed to weakness and subject to danger. This is particularly the case with risk. A failure to be prepared for (and thus ameliorate) risk is seen as evidence of poor management, and this in turn detracts from public confidence in the system in general, as well as the defaulting institution (Tremblay, Lalancette & Roseveare 2012). As suggested in Chapter 3, this loss of confidence is the greatest fear of Australian universities, all of whom are prepared to go to inordinate lengths to make certain of its retention (Norton & Cherastidtham 2018).

The areas of particular concern (based with expansion on Packer 2018) are:

- The risk of falling out of favour with the Commonwealth Government. This may be due to administrative as well as academic issues, such as late or inadequate returns, poor bookkeeping, or failure to adhere to legislative requirements
- The risk of bad publicity from TEQSA. As a general rule, most public universities have lost their original fear of TEQSA, and while the threat of deregistration has not diminished it has become increasingly obvious that this is a step that the Commonwealth would be most reluctant to implement. Thus, it is not TEQSA itself that the universities fear, but the risk of damage caused by an unfavourable report from that body
- The risk of public scandal - not moral or sexual scandal – but financial or academic scandal that could have been prevented through appropriate foresight. Again, failings of this type are seen as evidence of bad management and judged accordingly
- The risk of public betrayal – particularly a failure to deliver what is promised or expected, or worse some positive act that disrupts the relationship between universities and their community

- The risk of indifference – in essence a failure of the community to remain aware of its university and appear to care nothing about its needs. All Australian universities try to avoid this through the release of good publicity, which can take the form of research benefits to society, the sharing of facilities, the impact on the local economy, or even the success of the institute’s cricket team or theatre company in local papers
- The risk of the community regarding a university as an isolated or self-centred ivory tower that is only interested in itself, or worse, what it can drag from the community without the need to reciprocate. This loss of public sympathy is considered very real by Australian universities and major steps are taken to avoid it (Meek & Wood 1997)

As will be explained in Chapter 8 all of these issues exert considerable influence on course accreditation procedures in Australian universities.

#### **4.1.2 Risk Awareness in Australian higher education**

As a general rule, Australian universities are aware of risk within their operating environment, although often uncertain of its probability or consequence. The issue is less the existence of risk and more one of how it should be handled or avoided (Taylor 2018).

The poor management of risk (including a failure to do nothing) is seen as a threat to public confidence which must be avoided at all cost. This may in turn result in overreaction, with the response becoming more damaging than the risk it is hoped to avert, particularly when these are pseudo-risks, or as mentioned in the previous chapter, complete phantoms.

A university is as controllable as a school of fish (Elliott 2013). In a school of fish, all members are theoretically independent and free to go their own way but choose to swim together for their mutual benefit under the governance of a shared sense of group collectivism rather than a designated leader. If a predator strikes, the members disperse to form another school a safe distance away, but the school itself is never destroyed. While this comparison has flaws it remains an accurate reflection of what occurs in response to risk in most academic communities. Communication in a school of fish is achieved by watching others. If one moves in a particular direction, others may follow. If this does not occur, the original fish moves back to where it was previously. This is an exact parallel to what occurs when a crisis hits a university (Urgo 2017).

Universities have a greater preparedness than a school of fish, and believe themselves able to foresee future difficulties, which they can either avoid completely or reduce in intensity or consequence. There are, however, certain things that are forever unforeseeable, yet these too must also be anticipated. As mentioned previously foreseeable risks are avoided through prudent management, while unforeseeable risks are reduced in consequence (even if they cannot be avoided completely) through contingency planning. The difficulty is that institutions may overlook the difference between the two (Feast & Bretag 2005).

#### **4.1.3 Responsibility for risk assessment**

This has two effects. The first is the question of who is (or should be) responsible for risk assessment in an Australian university. The second is what should be done if the university, in a response to that experienced by Cassandra (*the woman who foretold the fall of Troy*) refuses to listen. Both remain vexed questions, with some (such as Renn & Klinke 2015) suggesting that identifiable risk should be addressed in the first instance by Directors of Risk, while unidentifiable (or less clearly identified) areas of risk should be addressed by the Planning Unit. Others (such as Tattam 2017) suggest that this responsibility should not be confined to any one person or office but be the task of everyone involved with the institution. Because of this uncertainty, procedures for the identification and mitigation of risk vary widely from one university to another.

The fact that it is assumed that there are persons (or a unit) responsible for risk is said by some to blind others to their responsibilities (Banks 2012). Others such as Newman, Couturier & Scurry (2004) suggest that risk anticipation and avoidance is best done by posting as many lookouts as possible on an assumption that many eyes (and multiple voices) are better than one. Despite this, and as will be explained in Chapter 8, the majority of staff in higher education institutions seem to assume that protection against risk is someone else's concern – possibly senior management - rather than their own. This is not a view shared by senior management, who appear to believe as a group that risk “awareness” should be the responsibility of everyone (Halloran 2018), a view summed up by the University of Western Australia;

The University of Western Australia requires all staff and students to manage risk on a daily basis. (*University of Western Australia – Risk Management Policy 2018*)  
<http://www.spp.uwa.edu.au/riskandlegal/risk-management>

## 4.2 The implications of risk for Australian higher education operations

### 4.2.1 What constitutes a higher education operation?

A Higher Education Operation is anything that adds value to something else. (Cheng 1993) While this includes the traditional tasks of adding value to knowledge through teaching, research, or interaction with peers, it also embraces everything with which a university is involved, such as the enrolment of students (and all other administrative tasks – value is added by the way in which a university conducts its business as an exemplar to the community), relations with its neighbours or even the coaching of sporting teams. If, alternatively, the university provides neither leadership nor example, nothing of value is added and the act should be seen as something other than a bona fide university operation (Pirog 2016).

Most (but not all) Higher Education operations are planned and deliberate – in other words, a university intends adding value to whatever it is working on - but this is not necessarily the case (unforeseen value can be added through chance or circumstance), nor is there rarely an intent to measure the quantity or quality of this value in advance (Fishman & Sledge 2014). Despite this, university operations can be costly and institutions must be certain that in adding value they are getting an appropriate return on their own investment. Unfortunately, there can be little altruism in the harsh world of Australian higher education. If an operation is not cost effective it becomes a drain on the university, irrespective of its social, educational or political value (Grant Thornton 2016). It is for this reason that most universities review their operations regularly, strengthening those that add value (often assessed in pseudo monetary terms for lack of other descriptors) while withdrawing from those that do not (Paton 2005). This again has enormous implications for course accreditation procedures, which as explained in Chapter 9 are expensive to run and must be seen to deliver value for money.

### 4.2.2 Strategies for assessing risk in university operations

There is always a risk that the return (whether it be monetary, social, educational or political) from an operation will be unsatisfactory, and as such a number of strategies have been developed to assess and manage these risks. These include (taken from the New Zealand Tertiary Education Commission 2017):

- Identification of the core activity

- Determining the factors that could lead to success or failure in providing the desired value
- Determining the prevalence of these factors
- Assessing the consequences if favourable or unfavourable events occur
- Identifying (at least in principle) the next stage of the activity, such as follow up research, the next step in the administrative process, and so on, with a view to ensuring a smooth transition if successful, or a safe withdrawal strategy if not.

All of these become important in the evaluation of course accreditation procedures. What these instructions (in common with the risk management instructions of many Australian as well as New Zealand universities) fail to do is to explain what should be done once risk has been identified. Indeed, in the majority of cases it would appear that it is the identification of risk that is important rather than its resolution (Brewer & Walker 2010).

#### **4.2.3 Internal and external risk assessment**

There is an important difference between risk identification and risk assessment. Risk identification alerts decision makers to the fact that risk may be present, risk assessment measures its seriousness while empowering others to do something about it. Both tend to be separate procedures in Australian universities, with one group or committee identifying risk (usually at the initial course proposal stage) but doing no more than noting its presence, while another measures its prevalence and makes plans to alleviate the consequences (normally at the course development stage) (Birch et al.2017). This split in responsibility may impair its efficiency particularly where phantom risk is involved as courses may be revised to avoid risks that have no real existence while others of greater consequence pass unnoticed (Yorke & Vidovich 2016).

Responsibility for the internal assessment of risk – the process to measure its probability and consequence - may be narrowed and made specific to a faculty, department or unit, as found in the University of Western Australia Proforma Health and Safety Manual (2017) or the Deakin University Occupational Health & Safety Manual (2016). Variations on these works are found – with acknowledgement – in many Australian universities. In virtually all cases, a set of general principles is provided followed by an emphasis on risks specific to the institution.

The difficulty, however, is that those responsible for the assessment of risk are relieved of the need to search for risks that were previously undetected – indeed it may be taken as an affront if further risks are brought forward that were not mentioned by what is in many cases a committee with superior status. (Thus, course development teams tend to be reluctant to raise issues overlooked by faculty boards, or faculty boards with vice chancellor’s advisory committees). This may mean that risks not detected earlier may be dismissed as unimportant and remain untreated, simply because they escaped listing by the risk identification group (Smith P 2015) [The classic example is risk of discrimination on the grounds of gender. This may be missed in the risk identification stage by male committees simply because no one went looking for it (O’Connor et al.2016). The issue, however, may be brought to the fore in the course development stage, but then be dismissed as irrelevant because it was not flagged earlier (Bank 2011).]

Internal assessment of risk in university operations tends to be local and highly specific, with each institution differing from its peers in its requirements and expectations. This is not the case with external risk assessors and university regulators, whose perspective is global.

## 4.3 External risk assessors in Australian higher education

### 4.3.1 Higher education standards panel

There are a number of external assessors with an oversight of risk in university operations. The chief of these is the Higher Education Standards Panel, a legislative advisory body appointed by the Commonwealth to advise on all aspects of Australian higher education under the overriding principles of regulatory necessity, risk assessment and proportionate regulation (TEQSA 2015). This body has oversight of TEQSA. Because of the breadth of their responsibility, neither TEQSA nor the Higher Education Standards Panel pays major attention to the content of courses or the minutiae of procedure, as these matters are more effectively dealt with elsewhere.

### 4.3.2 TEQSA risk assessment framework

The TEQSA Risk Assessment Framework has been simplified since its introduction in 2011, with the current 2019 (Version 2.3) document made less arduous on the major universities through greater concentration on the risks inherent in the smaller private providers (TEQSA 2019). Despite this, the minimum requirements of the TEQSA Risk Assessment Framework lurk in the background of all university operations and can only be ignored by the universities at their peril (Universities Australia 2016).

There are two sections of the Framework that are particularly important as far as university operations are concerned - Domain 5 (Institutional Quality Assurance) and Domain 6 (Governance and Accountability), each of which will be treated separately.

#### 4.3.2.1 Higher Education Standards Framework (HESF) Domain 5

This section of the Higher Education Standards Framework deals specifically with course accreditation procedures and formed the backbone of the current research. TEQSA provides the following commentary on this domain:

TEQSA's main focus will be on ensuring that the provider has an effective internal process for approval of all courses, which includes rigorous academic scrutiny through the institutional academic governance processes of the provider, independently of those involved directly in delivery of the course of study. All providers are expected to have such an approval process, whether they have self-accrediting authority or their courses are accredited by TEQSA. If we accredit a course of study, the point of departure will be the evidence of rigorous internal approval of the course carried out by the provider prior to making an application for course accreditation. Once we are satisfied that a provider's approval process is capable and continues to be so, less detailed evidence about the approval process itself may be required for regulatory purposes (TEQSA 2015)

It would appear from this that TEQSA's interest in the specifics of the approvals process is that it is effective, consistently applied, and acceptable to the academic community. While it is not mentioned as such in the TEQSA Guidelines – where it seems to be assumed rather than stated - this includes an oversight of the internal risk management of the process (Federal Register of Legislation 2017).

#### 4.3.2.2 HESF Domain 6: (Governance and Accountability)

Domain 6 addresses the question of institutional accountability. The most relevant section (for this research) is Paragraph (e) of Section 6.2.1 of the TEQSA Act, which requires institutions to demonstrate that:

e). *[Demonstrate that]* risks to higher education operations have been identified and material risks are being managed and mitigated effectively

The manner in which this is to be demonstrated is not specified, but it would appear from the actions of TEQSA panels in their assessment of Higher Education providers that the following are expected:

- Known (or at least predictable) risks should be documented in a *risk register* and strategies listed to mitigate the consequences should these risks eventuate
- The contents of this register should be familiar to staff, who in turn should be prepared to use their initiative within the guidelines of institutional policy to avert harm to staff, students and the institution
- The register should indicate both the probability and the priority of the risks faced by the institution in its daily work. These should include risks to continuity as well as the welfare of personnel. (There is no requirement to list all risks. The institution is simply expected to indicate those risks to which it feels itself exposed and its strategies for alleviating the consequences, almost as a form of reflection – and hence an evaluation of management - as much as a guide for future action – TEQSA 2019)
- The Risk Register should list the persons (or at least the positions or offices) responsible for identifying and managing the risk. These persons may then be questioned about the discharge of this duty during interviews.

The TEQSA requirements are all embracing and there is little mention of specific aspects of institutional operations. At the same time, providers are required to consider all realistic forms of risk in their scope, and this includes any issue that may arise from (or could be avoided through) the course accreditation process. (*Oral information on TEQSA requirements from Informant 12*) This has not stopped a number of universities from going well beyond this and prescribing in great detail how risk should be identified and countered. A typical example is Victoria University (Melbourne) (Appendix G).

#### 4.3.2.3 – Other external assessors

Other external bodies such as state governments, professional associations and practitioner registration boards have an interest in the risks involved in tertiary education – the state governments with finance and other groups with the quality of graduates – but play little part in course accreditation beyond their sphere or discipline, and for this reason their influence will not be discussed at any length in this document

## 4.4 Examples of risk management as an aspect of Australian higher education governance

It is possible to give examples of the implementation of risk management procedures from all Australian universities. The following are cited at random as a convenience sample:

### 4.4.1 Risk management at the University of Adelaide

The University of Adelaide has an extensive risk management policy, supported by a detailed Risk Management Handbook (2017). The university states:

The University has a statutory obligation for risk that is set out in The University of Adelaide Act.

In addition, it recognises that risk management is an integral part of good governance and best management practice for an organisation charged with responsibility for the advancement of learning and knowledge and university education.

The University's [Risk Management Framework](#) connects the University's governance structure and the management structure so that the two work together to provide a combined commitment, set of expectations, and organisational and personal accountabilities and responsibilities.

The Council, the Audit Compliance and Risk Committee and the Vice Chancellor and President have ultimate responsibility for risk within the University. From this highest level of governance and management each of the Divisions, led by the Vice Presidents, work with the Faculties, Schools and administrative areas so that risks are management strategically and operationally. For the University's Controlled Entities the Board and Senior Management of each entity takes responsibility for managing their risks.

*[University of Adelaide 2017]*

#### **4.4.2 Risk management at the University of Southern Queensland**

The University of Southern Queensland (2017) has established a Risk Services Unit to provide guidance to the university. Despite this, the university stresses that while guidance is provided the ultimate responsibility for risk rests on all staff, irrespective of their standing or responsibility.

We call ourselves "Risk Services" because we believe everyone is a risk manager, and our job is to provide the service and support you need to succeed in that role. University of Southern Queensland will exercise the [Risk Management policy](#) in all the organisation's important decisions, practices, and procedures so they are relevant, efficient, and effective..... Risk Services works with campus offices and units to identify, assess, and communicate to management the University strategic, academic, financial, hazard, and operational risks that make up risk chart. This work includes understanding how each portfolio is changing over time, specifically, what new risks have emerged, what risks are no longer active, and how the severity of the risks is changing. With good data about University wide risks, senior management will be in a stronger position to understand where best to focus limited risk-mitigation resources. The Risk Management Framework document provides valuable guidance for implementing and maintaining an integrated risk management strategy in the University of Southern Queensland (USQ).

*[University of Southern Queensland 2017]*

#### **4.4.3 Risk management at the Australian Catholic University**

The Australian Catholic University is a multi-state, multi-campus institution that while open to the public (and in receipt of public funds) is ultimately a privately owned tertiary provider. The university states (2017):

Risk management is aligned with Australian and New Zealand Standards AS/NZS 31000:2009 (Risk Management – Principles and Guidelines), as well as COSO and other standards across all business domains.

We developed our Risk Management Policy and Risk Management Procedure to:

- support effective decision-making guided by its Mission and vision
- ensure a consistent and effective approach to risk management
- formalise its commitment to risk management principles incorporating these into all University operations
- foster and encourage a risk-aware culture where risk management is seen as a positive attribute of decision-making rather than a corrective measure
- align ACU's planning, quality and risk management systems, and their integration into all areas of the University's operations
- ensure robust academic and corporate governance practices effectively manage risk, while allowing for academic freedom, innovation and development.

*[Australian Catholic University 2017]*

#### **4.4.4 Risk management at The University of Notre Dame Australia**

The University of Notre Dame Australia is another privately owned institution with campuses in Fremantle and Sydney. The university has developed an extensive procedures manual, with a statement (which has many similarities with the University of Southern Queensland) that risk is everyone's responsibility. The university states:

Risks comprise any event or action that impacts on the ability to achieve objectives – that is the effect or uncertainty on objectives. Examples of risk are events that may expose the university or its community to the possibility of economic loss or gain, any kind of damage, injury or delay, or negative impact on the university's reputation. Risks may also comprise events or actions that could result in missed opportunities. Risks may have a positive or negative effect. *[University of Notre Dame Australia 2017]*

### **4.5 Approaches to risk management by Australian Universities**

There are numerous approaches to risk management across Australian Higher Education. The following have been selected as examples of this diversity, although in Chapter 7 the philosophy of certain universities has been compared to their course accreditation procedure to show how the concept is applied.

#### **4.5.1 Risk management as protection for the institution (James Cook University)**

James Cook University (2017) appears to view risk management as a form of protection, a shield to guard the university from unnecessary risk while at the same time allowing maximum opportunity for development and innovation. The university states:

James Cook University Risk Management Framework has been developed to meet three primary objectives:

1. To provide consistency to business risk management practices throughout the university.
2. To provide assurance that all key risks within the business are being identified and managed appropriately, and to ensure the University, including management and the Council are aware of key business risks..
3. James Cook University, as a Person Conducting a Business or Undertaking (PCBU) is required to demonstrate that it has done everything reasonable and practical in addressing Work, Health & Safety (WHS) risks and that this is operationally delivered via the JCU WHS Officers. *[James Cook University 2017]*

In universities following this philosophy, risk management appears intended to protect the university rather than those within it. As will be shown later this has a significant impact on the course accreditation procedures of these institutions.

#### **4.5.2 Risk management as a means for minimizing disruption and ensuring business continuity (Southern Cross University)**

An alternative approach to Risk Management can be seen in those universities that view this exercise as a means for minimizing disruption and ensuring business continuity. Southern Cross University's risk management policy, for example, states:

- (1) The purpose of this Policy is to ensure that Risks to the University, its strategic plan or its objectives are identified, analysed and appropriately managed. It does this by creating a framework based on the Australia/New Zealand Standard for Risk Management (AS/NZS ISO 31000:2009) that includes:
  1. processes for the identification and management of University risks;
  2. accountabilities and responsibilities for Risk Management activities; and
  3. communication, monitoring and review mechanisms to ensure that the University's Risk Management activities continuously improve and are responsive to change.
- (2) The framework established by this Policy is not intended to eliminate Risk but rather provide structures to support the management of Risks to the University in order to:
  1. maximise opportunities;
  2. minimise adversity;
  3. inform decision making and achieve improved outcomes and outputs;
  4. assist in safeguarding the University's assets, staff, students, finances, property and reputation;
  5. improve the quality of decision making; and
  6. reduce costs through better targeted and more effective controls*[Southern Cross University 2017]*

#### **4.5.3 Risk management for the welfare of staff and students (University of Adelaide)**

Other universities view Risk Management as an instrument for the protection of staff and students. The University of Adelaide Handbook (2017) – a typical example - states:

Every person who engages in university activities is impacted in some way by risks, so every person has an active role in being “risk aware”. This involves identifying, assessing and managing risks and opportunities in day to day decision making and planning. As well as understanding and adhering to the reporting process within the university’s governance framework...Everyone is expected to work individually and collectively towards the active promotion of a positive risk management culture within and across the university and its controlled entities.

[Page 4 – Roles and Responsibilities] [University of Adelaide 2017]

#### **4.5.4 Risk management as an instrument for the maintenance of standards and values (University of Queensland)**

Risk Management can also be perceived as an instrument for the maintenance of standards and values. The University of Queensland states:

Risk is the effect of uncertainty on the achievement of objectives. If we know for certain the outcome of a particular action then it is not a risk, but more likely an issue. Where an element of uncertainty exists, then there are risks.

Within UQ’s enterprise risk management framework, risk is considered to encompass both threats and opportunities. Risk is not all downside, and by considering the upside of risk we are better placed to understand the uncertainty being faced.

Risk is considered at both the strategic and operational level within the University. No activity is too small to ensure good risk management practices are followed. [Univ of Qld 2017]

This is applied in turn to the maintenance of standards and values:

The University of Queensland is dedicated to appraising the quality of teaching and to undertaking regular reviews as part of the quality assurance framework. The University ensures the systematic and regular review of curriculum, teaching and program quality and risk.

Unless reserved by the Vice-Chancellor:

- Academic procedures are approved by the relevant member of the Vice-Chancellor’s Committee after considering any advice from the Academic Board or its subcommittee/s.
- Operational procedures are approved by the relevant policy owner.

New or revised procedures are referred to relevant stakeholders for consultation prior to being approved and issued.

Compliance with procedures is mandatory across UQ, excluding UQ's controlled entities (unless they are specifically included).

Local Standard Operating Procedures (**LSOPs**) are step-by-step instructions to enable the correct, consistent and efficient undertaking of particular tasks/activities at a local level. LSOPs are consistent with relevant policies and procedures.

The structure and content of LSOPs is decided by the issuing manager and may be customised to best meet the local area’s needs. LSOPs may be mandatory for the local area. If mandatory, they will be notated as such and protocols will be implemented to provide assurance on their effectiveness. [*University of Queensland 2017*]

(Course accreditation is viewed as an “academic activity” by the University of Queensland – it is sometimes viewed as a predominantly “administrative activity” in other institution - but is moderated by numerous “Local Standard Operating Procedures” which govern the individual stages in the process. The purpose of each, however, is the maintenance of standards through prudent risk management – *Advice from Informant 12.*)

#### **4.5.5 Risk Management as a means for learning and improvement (University of Melbourne)**

A number of universities regard risk management as more than simply the avoidance of risk. In the ultimate, the management of risk should form part of the learning process for both the institution and its community. This is the theme of the subject *Risk Management in Tertiary Education* (MGMT90220) as taught at the University of Melbourne (I H Martin Institute) as part of the Master of Tertiary Education Management

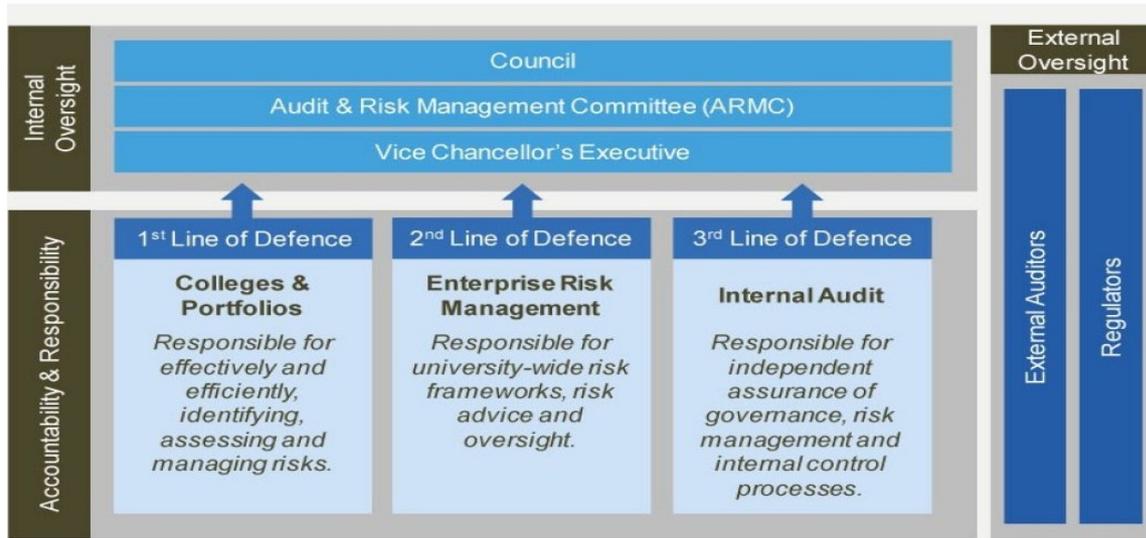
The outcomes from this subject include;

On completion, participants should be able to apply what they have learned by:

1. understanding the background and theoretical drivers for the emergence of risk management
2. describing different concepts and models of risk management
3. describing different modalities of risk management in a tertiary education context
4. assessing the effectiveness and efficiency of risk management practices within their own institutions and designing alternative approaches in case of ineffectiveness or inefficiencies
5. understanding the links between governance and risk management at the institutional level

#### 4.5.6 Risk Management as a multi-stage system of defence

In this model risk management is viewed as a multi-stage system of defence. This may be typified, for example, by the diagram provided by RMIT University as part of their risk management policy (RMIT 2017)



**Figure 4.1 RMIT Line of Defence Against Risk (RMIT 2017)**

In this model each stage is intended to support (and if necessary correct) the decisions made at an earlier level that may be inappropriate – or perhaps simply outdated – with two levels of oversight, internal and external

#### 4.5.7 The View of TEQSA on Risk and Course Accreditation

Perhaps the final word on the relationship between risk management, course accreditation and the relevant legislation should rest with TEQSA:

TEQSA acknowledges the diversity of providers and offerings in the higher education sector and will vary its approach to assessment of the quality assurance mechanisms of providers accordingly. Nonetheless, the Standards are applicable to all providers and for the most part the requirements are largely self-evident and are expected to be reflected in a provider's normal operations.

In relation to course approvals, TEQSA will need to be satisfied, irrespective of the scale and nature of the provider, that there is a rigorous process for scrutiny of course proposals that is applied consistently, is at arm's length from those who deliver the course of study, and is capable of competent relevant academic judgement appropriate to the level of study. This should involve external experts and input from industry and/or professional bodies where relevant, for example through a course advisory committee. A demonstrated capacity to conduct course approvals across a range of fields of study, at different levels of qualification and through a number of cycles of review, will build TEQSA's confidence in the provider's processes.

In so far as the internal course approval process canvasses the Provider Course Accreditation Standards, TEQSA will take into account the provider's track record of meeting those Standards in determining the scope of its assessment. In some cases TEQSA may consider, through the provider's case manager, a review of a provider's course approval process as a stepping stone in a journey to seeking self-accrediting authority. TEQSA may also consider a streamlined approval of cognate courses that share a proven internal approval process.

*(TEQSA Guidance Note 11<sup>th</sup> October 2017)*

## 4.6 Summary

Risk management is applied to many aspects of Higher Education operations, not least of which are course approval procedures, even if this is not clearly acknowledged. Indeed it is impossible to understand the intent behind many aspects of university management if the question of risk is ignored.

The chapter that follows (Chapter 5) shows how this intent was investigated.

## Chapter 5 Methodology

### 5.1 Methodological considerations

#### 5.1.1 The Conduct of research into Australian universities

While there have been numerous studies of various aspects of Higher Education in Australia there are few precedents for the conduct of research into the inner workings of Australian universities (confirmed by a check of Google Scholar on 9<sup>th</sup> December 2018) and the researcher was conscious of breaking new ground. This in turn required a novel approach to the research. Virtually all of the works that have examined administrative practice, such as Ross 1976, Allen & Allen 1988, Newson & Buchbinder 1988, or Power 1998 have focused on academic leadership rather than administrative procedures, with an emphasis on the situation overseas rather than Australia. Those writers who have touched upon the issue in Australia, such as Vidovich (2002) or Davis & Shattock (2009) have generally done so from a considerable distance as a minor point in their investigation of wider topics, and little information has been provided on what happens behind the scenes.

Previous research into Australian tertiary education has tended to fall into one or more of the following groupings, none of which (for the reasons stated in each section) was felt appropriate for the task in hand:

- Research into the Australian Higher Education system in general, with little if any mention of individual institutions. A typical example is the book edited by Marginson (2013) on *Tertiary Education Policy in Australia*. This model was rejected as approaches to Risk Management and the accreditation of courses (a matter rarely mentioned in any of these works) varied greatly from one university to another and it was felt that such a broad brush approach would miss many of the fine – but important – details that have not been investigated previously.
- Research into the history of Australian universities. There is now a vast corpus of literature dealing with the history of Australia's higher education system, most of which concentrates on the growth and development of individual universities (e.g Macintyre & Selleck (2003) Forsyth (2014) or Davis (1990)). This model was also rejected as there was little of an historical nature in the topic under investigation and it was felt that the methodology of the historian – essentially an exercise in explanatory evolution - would be inappropriate for a study of this type.
- Research into specific aspects of Australian university operations. There have been many studies in recent time of specific aspects of university activity, such as student life (Hil 2015), international students (Indelicato 2018, Poedjiastutie 2013) or first year students (Hillman 2005, McInnes & James 2000). While the works in this category were more in line with the research proposed, most were inadequate as role models as they focused on an *external* rather than an *internal* aspect of Australian university management, with little reference to specific institutions.
- Government (and other regulatory) reports, such as parliamentary papers and AUQA or TEQSA documents. These belong to a different genre from academic publications, and while useful as primary source material were inappropriate to the task in hand. While several scholars have published material in quasi-reports of a high academic standard (such as Edwards 2012) it was felt that a purely report type approach would be insufficient for a thesis. What was required was not simply a description of *how* something was being done (much less a judgment – as found in most reports - on whether the stated aims were achieved or not) but an explanation of *why* certain actions took place – an investigation of the bridge between intent, process and outcome found across Australian Higher Education, using as the unit of

analysis the procedures of all 40 universities.

- A number of writers (such as Dragan, Ivana & Arba 2014, Vikcic, Bach & Tomicic-Pupek 2014, Noonan 2015 or Roseman 2017) have adopted a process modelling approach to the examination of university operations, which (with the exception of the first two, which are the seminal papers that drew attention to this approach in Australia) focus on specific institutions rather than the sector as a whole.

This model was felt more promising, although greater influence for this research was that conducted under the Charles Sturt University's (CSU) Workplace Productivity Program that culminated in the publication of the slide show *Process Modelling and Analysis: Proposing a Higher Education Reference Model* (2009).

The CSU Workplace Productivity Plan is explained as follows:

In 2005, Charles Sturt University identified work process improvement as a strategic imperative and embarked on an ambitious project to review its work processes. In 2006, a grant from the then Department of Education Science and Training (DEST) allowed the project to be extended and it became the "CSU Workplace Productivity Program - A Structured Approach to Workplace Productivity Renewal and Reform".

The aim of the program was to review the current state of processes at a high level, identify opportunities for reform or renewal and develop frameworks and strategies to support the realisation of change programs. Applying general principles of Enterprise Architecture and Business Process Management and Change Management the program undertook a series of projects and was completed in November 2008.

[Charles Sturt University 2009]

While much has been written about the CSU workplace productivity program (particularly by Cox 2008 – 2012), most of this has appeared in the higher education administrative journals, or as participant notes distributed face to face at workshops and forums. While accepted as legitimate by those in the sector – and hence the reason for its use -it would seem that the project and its methodology has attracted little attention in the academic media.

The methodology used by CSU can be easily described. To avoid disruption (and potential staff panic!) the first stage involved simply a complete review of the university's procedural instructions as an exercise in document analysis. The reviewers examined what was written and questioned the relevance of certain procedures - a number of which dated back to the early days of the university as a legacy from its predecessors – against the needs of current practice. Anything deemed obsolete was deleted. The reviewers then observed what was happening in the field, and whether what was described in the documentation was in fact occurring at the university's workstations. It was found, as might be expected, that many things had been changed, either for efficiency or because of technological improvements, although little of this had been recorded. The practices that were retained were then standardised, documented and implemented.

While the Charles Sturt Workplace Productivity Program was essentially an exercise in change management, the intent was to change administrative procedures rather than to simply make adjustments to the personal or the organization of the university. Other universities have since adopted a similar process for change and a pool of resources has been developed. (One example, of the many that could be cited, is the Australian National University Change Management Framework 2010, which deals with change to procedures as well as the relocation of personnel.) (Australian National University 2010).



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**Charles Sturt University - National University for Inland Australia**

Figure 5.1 CSU Workplace Productivity Program (Cox 2012)

The methodology developed by Charles Sturt University for this project – which was essentially a review of documentation followed by an investigation of what was actually happening on the ground - was regarded as the most appropriate model for the research, as:

- Most administrators in Australian universities – at least at a senior level - were familiar with the Charles Sturt Workplace Productivity Program (a project that has attracted considerable attention) and the conceptual pattern of a review of the documentation, confirmation by staff and a justification of procedure was something with which the majority of staff were familiar and comfortable.
- Course Accreditation and Risk Management were recognized as falling into the pattern of “higher education *administrative* procedures with an academic input” (Heck, Johnsrud & Rosser 2000) – one of a number of standard classifications of tertiary activity used in the evaluation of administrative efficiency (Kivisto & Pekkola 2016) that would fit smoothly with the methodology.
- The model followed current TEQSA procedures for the review of administrative practices.
- The model allowed for the subsequent development of separate issues (such as the cost, timeliness, staff endorsement, and so on, of specific aspects of administrative practice) although for reasons of time and space these were not investigated further in the current research.

### **5.1.2 Procedural courtesies and the collection of data**

It was essential to circumvent a number of sensitivities that could impede the flow of information. These included the facts that:

- The researcher had worked in universities for much of his professional life and in the years preceding his retirement had been actively involved in monitoring university compliance on behalf of the government. For this reason, it was essential that he not be seen as a TEQSA informant or undertaking industrial espionage on behalf of his own university.
- TEQSA had an interest in this research as they were (and are) extremely interested in all aspects of risk in Australian higher education, and course accreditation is not excluded. Hence, it was considered essential to establish complete neutrality from the outset to create trust on the part of respondents.
- TEQSA had required all universities to upgrade their approval procedures from 1<sup>st</sup> February 2017. This created only a small time window for the collection of data and the possibility of confusion between former and new practices.

These problems were avoided through the development of appropriate protocols throughout the entire activity.

The research commenced with an examination of the material produced by the universities themselves (which was normally available quite freely on their websites) and this was then used to develop a framework around which the research could be conducted. After examination of the policies and directives of each university on risk management and - quite separately - course accreditation (the first stage of the project), selected informants within the institution concerned were identified who would then be approached to provide guidance on certain matters, particularly where gaps appeared to exist in published procedures (the second stage of the project). It was felt

that a *feigned ignorance* on the part of the researcher would place informants in a position of superiority and avoid any sense of an inquisition.

The project was therefore commenced with the collection of as much material on these topics as possible from the public and private universities in Australia.

### 5.1.3 Sources of information on Australian universities

For convenience, the vast portfolio of printed and electronic material available to the researcher was divided into two categories – that produced by the universities themselves, and that produced by others, using an analysis protocol based on Sabatier & Mazmanian (1980) supplemented where necessary by the methodology suggested for the analysis of higher education documents by Capt (2013).

#### 5.1.3.1 University produced material

Only those things presented in the name of the university (and presumably endorsed by senior management as official statements of the institution) was regarded as *university produced material*, and hence as primary evidence. This material was divided into five groups:

- Official documentation (annual reports, policy statements and other material produced by the university intended for public distribution)
- Reports and returns to governments which, while private as far as the university was concerned, were released to the public virtually unchanged by the government department involved. This included statements to both Commonwealth and State authorities, such as the NSW Department of Fair Trading as well as more traditional sources. If the material included a commentary (or had been extensively modified or redacted before publication), it was not included here but placed under Non-University Produced material – see the following section.
- Documents produced for the guidance of staff but made available (for a variety of purposes) to the public at large. Virtually all Australian universities make their course accreditation and risk management procedures publicly available. (The reasons for this are discussed in Chapter 9)
- Documents that are not generally available to the public, but which universities were willing to make available against a possible Freedom of Information request. (*Perhaps surprisingly, it is rarely necessary to lodge a formal Freedom of Information request to gain access to administrative instructions in Australian universities. The mere suggestion that such a request might be made is normally sufficient to ensure its release as nothing involving commercial confidentiality or the privacy of individuals is involved, and a voluntary release avoids the bureaucracy and record keeping associated with compliance*)
- Other documents written by those within the university, such as the Students Association, the National Tertiary Employees Union (NTEU), papers published by staff and (most importantly) the statements of duty found in staff recruitment advertisements. While it was realised that much of this (with the possible exception of job advertisements) could hardly claim to have been *endorsed* by senior management, the fact remained that these publications would be at least known to the institution and could, if necessary, be refuted.

The content of all of these documents was taken at face value and their veracity unchallenged, although it was realised that this might be changed in the light of interviews.

#### 5.1.1.4 Non-University produced material

The category of non-university produced material was made a catch-all for everything that appeared relevant, but which had not been authored by the University concerned or by those within it. This included TEQSA reports, Government documents, press and media commentary, and anything else that was not a product of the university itself. These documents were divided into two groups:

- Material that could generally be accepted as true, but which might still be subject to bias or misunderstanding of some type, such as reports from government departments
- Material whose accuracy needed to be verified at first hand (particularly media reports and union statements, which might well be based on misunderstanding or serve a hidden agenda).

A separate folder was then prepared for each university in preparation for the conduct of interviews.

## 5.2 Comments on the methodological approach

### 5.2.1 Brief summary of the methodology

Essentially what was envisaged was a two-stage process, based heavily on university documentation. The first of these stages involved determining what the universities claimed to be doing from their published material. The second was the filling of any gaps in this information through the interview of staff as a verification of what was actually happening on campus. Of these two parts, the core evidence would come from the documents themselves rather than the interviews. The purpose of interviews was simply to collect any missing information and to improve the researcher's understanding of the documented process, not to seek additional or unrequested data, nor to look for skeletons in cupboards.

This last was important. It was felt vital to separate the project from the researcher's professional work and to avoid any suggestion that the research might be an excuse for gathering information on behalf of third parties such as TEQSA. (It was understood that TEQSA had previously expressed an interest in reducing the diversity of course accreditation procedures across the sector but had been prevented from doing so through a need to address more pressing issues – there was no suggestion that there was anything wrong with current procedures or that the system was in need of reform, and the intent was to gain uniformity and consistency rather than abolition or improvement. At the same time it was considered essential that the researcher not be associated with this in any way.) For this reason the emphasis (and ultimate analysis) was placed squarely on the documentation published by the universities themselves rather than on any additional facts that staff might let slip in conversation.

While there have been investigation of procedures in other industries using a similar methodology, such as Gibson 2005, Gottschalk 2010, Penner 2013 or Shoemark 2018, none of these have related to universities.

### 5.2.2 Implementation of this procedure

#### 5.2.2.1 Collection and sorting of material

The collection of material was time consuming but not particularly onerous as much of the documentation was in electronic form, easily understood and readily available.

University staff were also more than willing to provide additional material, to the point of explaining where to look for further information on their website, or in certain cases using their staff log-in to give access to papers that were not readily available to the public, such as the minutes of meetings where this was required to demonstrate a point. These last mentioned documents were considered background material only as they were not made publicly available, and while appreciated were neither copied nor removed from the informant's office.

#### 5.2.2.2 Development of a portfolio for each institution

It was apparent at an early stage that there were distinct differences between Australian universities, based on location, affiliations, history, culture and tradition, and that every university saw itself in a different way from all others. An awareness of local politics and sensitivities, and the avoidance of any issue not related specifically to the research was also important, and it was realised that great care would need to be taken in preparation for contact with each institution

For this reason, a separate portfolio was prepared for each Australian university, listing the current office holders, the disciplines on offer, recent achievements, and the intent of the institution, particularly the current strategic plan. This portfolio – essentially a list of things to be aware of before entering a particular campus or seeing a particular member of staff – was used to set boundaries before specific issues were considered.

The portfolio also included details of the institution's course accreditation and risk management procedures. While the so called *official* documentation of the university was used as a primary source, much background information was derived from *incidental* material, particularly job descriptions, organization charts, and other data from recruitment advertisements. (As much of this material is ephemeral, and is normally removed from websites as soon as positions are filled, a long collection period – commencing indeed from the very start of candidature - was required, including use of the Wayback Machine (See Section 10.2.2 for more information on the use of the Wayback Machine) Despite this, job advertisements - and similar material in the public domain – provide great insight into the inner workings of Australian universities).

#### 5.2.2.3 Development of a standardised data collection method

There was a danger that too much information – much of it inconsistent, or specific to one informant or one institution rather than all – would be available if data was collected at random, or if over dependence was placed on the material collected from one informant against that provided by another.

A data collection proforma was therefore constructed using the model of Wilson (2014) that could be used to retrieve information irrespective of the institution or the informant. While space is insufficient to provide details of this proforma here, these are included as Appendix H (and also Appendix I). The data collection proforma enabled information to be reduced to a numeric code for retrieval purposes via an Excel® spreadsheet, and while the study itself was purely qualitative, much time was saved through this method of quick reference.

#### 5.2.2.4 Development of a protocol for the conduct of research into universities

There does not appear to be any precedent for the conduct of sensitive research into the inner workings of Australian universities other than that undertaken by regulatory authorities – an audit based model felt inappropriate under the circumstances. This required the development of a fresh approach which may be of assistance to others working in this field. The protocol developed for the conduct of research into Australian universities – as used throughout this project - is given in Appendix J.

#### 5.2.2.5 Application of the Methodology

In view of the novelty associated with the conduct of research into universities, a separate post-mortem was undertaken after data collection had been completed, explaining what occurred and exploring the strengths and weaknesses of this methodology. As this document is lengthy, it is included as an appendix rather than in the text (Appendix L).

In summary, the methodology chosen was believed the best for this type of project. The need for an exhaustive preliminary analysis of the documentation (discussed further in Chapter 6) was felt

essential, firstly for clarification of the intent of the universities concerned, and secondly to prevent the researcher being dismissed as an ignoramus and time waster should he venture on campus. The conduct of interviews by telephone – the only means open to the researcher in view of his limited time and resources – also saved considerable time and avoid many unnecessary complications.

#### 5.2.2.6 Human Ethics Approval and Interviews

While interviews occupied only a small part of the research and were used to fill gaps rather than elicit new information, formal approval from the UTS Human Research Ethics Committee was required. This was granted – Approval Number 201400019 – in February 2015. A total of 43 interviews were held, although some were very brief. (Interviews were not held with all universities as in many cases no further clarification was required. This might suggest an inadequate or incomplete collection of data, but this is easily refuted as the primary material for the research was the documentation supplied by the universities rather than the words of informants. Interviews were held where necessary, but only to clarify this published material, not to seek expansion (or alternatives) to the data. Appendix M describes the protocol that was developed for conducting research into other institutions.

### 5.3 Summary

As will be discussed in the following chapter (Chapter 6) the research was essentially an exercise in document analysis, supplemented where necessary by the interview of informants to fill gaps or to resolve uncertainties. The information provided by institutional documentation was regarded as valid, up to date and accurate (a reliance confirmed at interview) and was used to form the skeleton around which the investigation was conducted. The supplementation provided by informants was regarded as less certain, as while all were familiar with their particular role in the process, few had a complete picture of events that occurred elsewhere. For this reason, the data provided at interview was regarded as accurate but incomplete and – unless immediately associated with the duties of the respondent – potentially misleading, based possibly on hearsay or assumption, and generally of secondary importance.

As a study of the documentation published by the universities formed the core of the study, no apology is provided for giving a detailed description of its analysis in the following chapter.

## Chapter 6 The Data Derived from Documentation and Interviews

*This chapter discusses the documentation published by the universities, its content and analysis. The chapter suggests that while this material is obsessively for the use of staff within the university it is ultimately provided for a wider audience, essentially the public and regulators, and because of this – and the fact that staff would be expected to be already familiar with the internal procedures of their institution – it remains by its nature incomplete.*

### 6.1 Why focus on documents?

As suggested in Chapter 5, there are five reasons why the research was based primarily on documentary material:

- As official statements issued by the universities concerned, there could be no question of the provenance or validity of these documents provided the most recent publications were retrieved. There was therefore no need to test the puissance of this material.
- Virtually all of the documents needed for the project were readily available on institutional websites while those that were not could be readily acquired from the university involved.
- The availability of this material enabled relevant informants to be identified and appropriate questions (from a set collection) determined for each interview.
- As course accreditation is a multi-stage activity few informants were expected to have a complete insight into the process beyond their immediate role. As no one in a university wishes to appear ignorant, it was strongly suspected that this deficit would be made good by supposition on the part of interviewees, and that these inconsistent reports would confuse rather than enlighten the researcher
- To maintain the confidence of informants (and to avoid any suggestion of an ulterior motive) it was felt essential to confine interviews solely to the filling of gaps in the available documentation rather than to break new ground. This restriction meant that many factors that might have been valuable for others investigating the inner workings of Australian universities had to be left unmentioned, but it gave at the time a much greater protection to both informants and the researcher.

For these reasons, the research was considered an exercise in document analysis, supplemented by interview where necessary, rather than a project based primarily on what the researcher might have been told by informants. There is no doubt that wider – albeit less relevant – data might have been collected had the research been based on open ended interviews, but there was a grave risk that this would have produced an unwieldy outcome that would have been of little benefit.

#### 6.1.1 The nature and status of official documentation

In theory anything that carries the name and logo of an Australian university has the potential to be an official document issued by that institution. It was decided, therefore, to impose the following tests to determine whether or not a document should be used as a primary source (based on O'Dochartaigh 2012):

- The lack of an author – Official documents rarely have a stated author. While many documents may carry the imprimatur - and hence the name - of a senior officer, this is simply a recognition that the person concerned has *authorized* the content, not that they have composed it personally or that they necessarily agree with everything within it. Indeed, the fact that the authorship has been concealed may well be the best evidence that

the document comes from the institution as a whole (rather than an individual) and is therefore *official*.

- The intended audience – In virtually all official documents there is no salutation, and there is often little if any mention of the names of the intended recipients, although there may be mention of the positions they hold. Essentially an official communication comes from one *office* (rather than one person) to another, rarely from a single individual to their subordinates. In certain cases (such as policy documents) the audience is acknowledged by implication without any mention of names. In others it would seem to be assumed that the contents should be available to the world at large (as in recruitment advertisements), and hence no recipient is necessary. If recipients are greeted by name, the document is essentially a private communication rather than an official statement (Foulger 2004).
- The style of the document – Official documents use a particular style that is formal in tone. Thus, the words *must*, *should* and *will* are predominant, while less positive terms such as *might*, *could* or *possibly* are notably absent. Private or personal correspondence is generally the complete reverse, with the author tending to moderate the tone to prevent inadvertent offence. It should also be noted that official documents are normally written in the present continuous tense to stress their habitual performance. Personal documents are written in the present indefinite tense (sometimes called *present simple*) without the implication of a continuing transience (Rice 2017).
- The format of the document – Most official documents follow a standard template that is specific to each university, and which can be easily identified by a comparison with documents of known status. If a particular work does not follow that template – and there is no explanation provided - there may be grave doubts about its official standing (Asensio 2014).
- The permanency of the document – Official documents normally form part of the archives of a university and are rarely destroyed or discarded irrespective of their currency. The key question then, is whether a document is retained, and if so where? Many universities have a decentralized records storage system, with paper and electronic records held in a secure vault off campus, often with faculty or departmental records kept separate from the central administration. Thus, the more important issue is not whether a document has been retained by a university but the location of its retention and its security. The more secure the retention of a document the more it should be regarded as *official* (Department of Human Services Australia 2016)
- The availability of the document – Official documents are normally made readily available to the public by Australian universities. Those regarded as less *official* may not be available, or available solely to a restricted readership. It would seem safe to say that if a document is available without restriction to the public, either via university's website or otherwise it should be regarded as an *official* document (Commonwealth of Australia 2012)
- Reference to the document – The ultimate test to determine the official status of a document is whether it is referred to elsewhere by the university, particularly in documents whose providence cannot be questioned. As a general rule, if a university refers to another document from the same source there is every reason to believe that the latter is regarded as *official* by the university (OECD 2013).

Why it was necessary to apply rules of this nature? Unfortunately, there is a grey area between official and unofficial documents in a university, where there is much publicly available material that may not necessarily have the imprimatur of the institution. This applies particularly to research papers and other works that are hosted on university websites as a product of staff research, but which do not

form part of a university's official documentation. While many of these works are valuable in their own right, they are in essence the views of private individuals, and it was felt that they should not be included in the documentary analysis.

There are in addition other works which while not originated by the universities themselves have been accepted without objection by these bodies, such as the Bradley Review (2008) and the Grattan Report (2018) and these are regarded throughout this document as "university publications by adoption".

#### 6.1.1.1 Legal status

The legal status of university publications forms an area of uncertainty, particularly the question of whether a university is obliged to conform to its documentation and to complete everything it has promised to perform (Orr 2012). This is particularly the case with anticipated outcomes – no university for example *guarantees* that its students will *learn* what is taught in its classrooms. All that it promises is that teaching will be provided to an appropriate standard, while the remainder is up to the student. For this reason, much of the material that appears in the name of a university is claimed as a *statement of intent* rather than a positive commitment (Berger 1994), and this applies equally to published documentation.

The situation is a little different where a document (or a portfolio of documents) is used to establish the credentials of an institution, such as papers submitted to TEQSA for the purposes of registration. In cases of this type the validity of the content is assumed, with retaliatory action taken if what is described is not so (Tertiary Education Quality and Standards Agency Act 2011). Hence, it was assumed for the purposes of this research that any material that had been (or could have been) submitted to TEQSA for the purposes of registration had the status of at least a quasi-legal document and should be regarded as valid.

#### 6.1.1.2 Compliance status

Australian universities are required to comply with a vast range of legal requirements, many of which (such as the Anatomy Act 1977, the Coroners Act 2009 and the various local government Acts) are of little immediate concern to TEQSA or indeed to other regulators. At the same time TEQSA could well use a failure to comply with the law (particularly a successful prosecution against a university and the scandal this produces) as grounds for the suspension of registration, and to avoid this the vast majority of Australian universities have appointed compliance officers (often but not always in the corporate legal unit) to ensure that no laws are broken and that all legal commitments are met.

In most Australian universities the role of the compliance officer is purely advisory with little right of veto if infringement is detected. The most that a compliance officer can do is to alert his or her superiors and allow them to determine the action to be taken (Curtin University 2013). Despite this, compliance officers are normally required to check publicly available documents before approval, and to advise their superiors of any risk emerging. A typical statement of duties is that provided by Victoria University (Melbourne).

The Policy and Compliance Officer will be responsible to contribute to the ongoing development, review and continuous improvement of the University's Policy, Quality and Compliance frameworks, systems and processes. This role will assist with the maintenance of the Policy Development Process, Compliance Management Framework and associated online information systems such as the online Policy Library and Compliance Obligations Register. The successful candidate for this role will support relevant and accountable officers and operational areas across the University's Policy, Quality and Compliance frameworks, systems and processes, in order to ensure the University meets its obligations under laws, regulations, codes and organisational standards. [Victoria University 2017]

A similar (albeit briefer) statement is made by James Cook University

The [Risk and Compliance Officer](#) supports the Chief Of Staff to oversee the requirements of the University's Compliance Framework, including:

- coordination and implementation of the compliance process across all areas of the University;
- development and management of the Compliance Register; and
- monitoring and review of Compliance Action Plans

[James Cook University 2017]

The documents examined normally included those associated with course accreditation and risk management, and it was felt that if there was evidence that compliance officers had verified these documents beforehand (*using information obtained at interview if necessary, rather than seeking it from within the documents themselves*) they could be accepted as valid for the purposes of this research.

#### 6.1.1.3 Moral status

While the legal status of certain documents (such as student recruitment advertisements) remains uncertain, it is generally assumed that if a university knowingly places its name and logo on a particular instrument it has at least assumed a *moral responsibility* for the content, with the outcome to be determined, not by the courts, but by public opinion. Thus, anything that carries the name and seal of a university (and which comes unchanged from that source) should be regarded as authentic in intention if not in deed (Forster 2012).

The moral status of documents not only confirms authenticity but gives an indication of the attitude of a university to its publications. If a university treats its publications with respect and caution, there might be more to be learnt from this material than from institutions that release documents with apparent indifference. This is particularly the case with the documents produced by university entities, which might or might not have the restraint shown by the main stream components of the organization (Mukhopadhyay 2016).

## 6.2 The use of documentary evidence to shape other sources of information

### 6.2.1 Gap analysis

The gap analysis methodology suggested by Bowen (2009) as amended by Kara (2012) was used extensively throughout the research. Gap analysis simply involves a search for gaps in the narrative – areas where there is insufficient information or where procedures may have been omitted through the incomplete knowledge of the compiler (AHRQ 2017).

Gap analysis has a significant importance in risk assessment, where one of the great dangers is that threats may be overlooked. This is avoided through the use of risk flowchart (Risk Assessment Institute 2006).

Something similar was used with the course accreditation procedures published by Australian Universities. A flowchart was prepared for each institution, showing the published information and

identifying the gaps that might have emerged. This was then used to prepare the questions to be asked of informants.

It was soon established that most of the published information was directed towards the academic staff (rather than the administrative staff) of each university, and that there was relatively little about the behind the scenes work performed by the Administration. This in turn suggested many areas to be investigated further, particularly whether any one person, office or unit had complete oversight of the process, or whether additional documentation existed that was not on the public record.

### 6.2.2 Sources of additional information

Considerable information was obtained from *informed* but not *official* university documentation. Informed documentation is material originating from university staff or those close to the university, rather than the university itself. Material of this nature includes:

- The reports of regulators (particularly AQUA, which was more open in its statements than its replacement, TEQSA, although most AQUA reports have become obsolete through the passage of time)
- Material published as a commentary on university activity, in journals such as *Campus Review* and *Campus Morning Mail*
- Comments by professional bodies (particularly where professional bodies formed part of the course accreditation process), unions or student bodies
- Statements of duties in job advertisements, particularly where the details were provided by agencies seeking casual staff for peak university activities (such as enrolment) rather than the universities themselves.

While little of this was able to fill the gaps in the official record it did provide valuable background on the universities and was of considerable benefit to the researcher.

## 6.3 The course accreditation and risk management procedures published by universities

### 6.3.1 The nature of this material

The material provided by the universities can be divided into three groups:

- Policy statements – these are official statements by the university prepared (at least nominally) as a guide to staff, but more clearly for a wider distribution to the public, to regulators and to benefactors
- Procedural statements – these take their authority from policy statements and while nominally presented as instructions to staff are intended for a wider audience, where they are used to demonstrate the effective governance of the institution. (Geodegebuure & Hayden 2007)
- Internal documents found on websites – these documents are again sets of instructions to staff that have been placed on institutional websites but where their placement has been made for the convenience of staff rather than for a wider audience. In certain cases, a staff log-in is required to access this material although in the majority of institutions much of it was available without restriction but could only be found after diligent searching using the institution's internal search function. This contrasts strongly with *procedural statements* which are intended for a wider audience and are rarely difficult to find.

Where material came from a source other than an official website, its origin and providence needed careful consideration, together with the reason why it might have been written.

### 6.3.2 The purpose of this material

The material provided by universities would appear to serve three purposes:

- The guidance of staff - The basic purpose (whether nominal or actual) is to provide guidance to staff. Thus, policy is developed to explain what should be done under normal circumstances while procedure describes how to do it. At the same time the format and content of this material suggests that universities may always have a wider audience in mind
- The satisfaction of regulatory requirements - There are a number of cases (such as the submission of annual reports) where it is mandatory for documents to be provided to external parties. While this does not apply to all documents under a university's control, it would seem that most of the so called *public documents* – i.e., those not intended solely for internal use – are written as though they might be requested by (or subpoenaed by) these bodies at some future date. This applies to both course accreditation and risk management policies and procedures as well as all similar documentation.
- Maintenance of stakeholder confidence - It would appear that one of the significant uses of these documents is to maintain stakeholder confidence. While this is a secondary use (the ultimate purpose of this material is to provide guidance to staff) the fact that sound procedures are in place and are being enforced gives much greater confidence in the operation of the institution (Trakman 2008).

### 6.3.3 Is course accreditation seen as an academic or as an administrative activity by particular institutions?

Course accreditation (and to a lesser extent risk management) involves both an academic and an administrative input. The balance between the two is important as it frequently represents the way in which institutions view their academic and administrative processes and this in turn reflects both their power structure and their mode of operation (Hyde, Clarke & Drennan 2013). As mentioned in Chapter 5, course accreditation (and risk management) has been regarded throughout this paper as an “administrative function with an academic input”, although it is realised that it may not necessarily be seen that way by all Australian universities. This in turn has enormous implications.

If, for example, a university sees course accreditation as a predominantly *academic* exercise, the emphasis is normally on the quality and content of course proposals, with the administration simply providing the support and linkage needed to sustain this investigation. If, on the other hand, course approval is seen as predominantly an *administrative* exercise, the emphasis will frequently be placed on format rather than content, to the point where (at an extreme) the approval process becomes simply a data gathering exercise to support the other administrative functions of the university, although extremes either way are rare.

There are, of course, few instances where this become a case of solely one thing or another, with course accreditation being seen as purely an academic or administrative exercise. What happens in practice - as explained in Chapter 7 - is that the accreditation procedures of each university lie between these extremes. The balance, however, is normally a reflection of power. A university in which the academic influence predominates will often have very different procedures – an issue far wider than course accreditation - to one where greater power rests in the hands of the administration (Marginson 1977).

This is less true of risk management, which is almost universally depicted as an administrative rather than an academic matter in university documentation. This is unfortunate as it suggests that it is the Administration (rather than the academic community or the university as a whole) who should take the responsibility for risk. In reality (as explained in Chapter 7) the situation is more evenly balanced than the documentation may suggest.

## 6.4 The use of documentary material in the research

The documentary material provided by the universities was regarded as the core of the research (with the interview of informants being used to fill gaps and clarify issues rather than to generate new material). As a result, much greater emphasis was placed on what the universities claimed to be doing than what informants (with their more restricted vision) believed that their institution might be doing.

As much documentary material as possible was gathered from publicly available sources, preferably websites as these tended to be more up to date than printed copy. This material was then used to prepare three charts for each Australian university.

- The first was simply a flowchart of the published course accreditation and risk management procedures for each university, showing each of the stages involved with the names or positions of the principal decision makers. Any gaps or inconsistencies that emerged were noted for subsequent discussion with informants.
- The second was the preparation of an organization chart for each institution, with particular emphasis on the administrative as well as the academic and management structure. Most of the published material (such as Annual Reports and Audit Reviews) deals with the academic and senior executive structure, with little reference to the administration. To gain information on this sector, it was found essential to look at job advertisements and to construct from them a mosaic of the administrative structure of each institution from the reporting lines provided for the guidance of applicants. [Most non-academic advertisements for Australian universities include the reporting line for the position in question. As this information is rarely available elsewhere, these advertisements formed a primary source of information]. This organisational mosaic was then combined with the more publicly available parts of the organizational structure to give a complete picture of relevant units such as Finance Units (as it is within this part of a university that most Directors of Risk but not Directors of Quality are located), and to show the interdependence of one group upon another.
- The third chart was a product of the other two and was an attempt to identify key personnel for interview. It was felt at the outset that the most obvious candidates (such as chairs of academic boards, senior managers, and so on) might be less desirable as informants than those actually carrying the procedures, and an effort was made to determine the persons best able to provide information, who would have the time to talk and not be intimidated by doing so. While it might be discourteous not to see senior staff while on campus, it was felt that more significant information could be provided by subordinates closer to the coal face, particularly if their confidence could be gained.

This third chart produced a pool of potential informants that was too large to be practical. An attempt was therefore made to cull these lists to no more than one or two in each institution, or where the documentation seemed clear, to avoid certain universities altogether. (In reality there were only a few instances where the latter was possible, although special arrangements were felt expedient for geographically distant institutions.)

[A sample of this material – in this case, a report prepared in anticipation of a visit to the University of Canberra and the Australian National University - has been included as Appendix N.]

Once these charts had been prepared an attempt was made to identify local sensitivities (in other

words those things that staff might be uncomfortable discussing with an outsider, either because of personal or institutional embarrassment or through a wish to conceal commercial interests). Prior knowledge of these sensitivities was felt essential to avoid involvement in local issues and to keep informants on track during interviews. An attempt was also made to access the student newspapers of the institutions concerned (now often online) and, in the case of the regional universities, to see what the local press might have to say about the campus (usually via Trove and other search engines). A conceptual image of each institution was then developed based on this information.

As explained in Chapter 5, it was realised that travel to distant centres would not be possible, so much of the material from interstate and country campuses was collected by phone. This in turn meant that the questions to be asked – which would be e-mailed to participants in advance – needed to be carefully shaped to retrieve the information required within a minimum period of time and at least inconvenience to informants.

## 6.5 Interviews

It was originally planned to devote a separate chapter to interviews but this was felt inappropriate in view of the comparatively small role that these played in the research, with interviews being intended to fill gaps rather than generate new knowledge. For this reason, a discussion of the data derived from interviews has been relegated to only one section of a longer chapter. (Further information on the interviews themselves, the questions asked, and the method of analysis are included as Appendix H.). A small number of interviews was held face to face (and these solely in institutions within a reasonable travelling distance of Sydney). All of the others were held by phone, with the informants supplied with a set of questions in advance. As the purpose of interview was to fill gaps rather than generate additional knowledge considerable emphasis was placed on specific issues.

The use of phones provided difficulties, particularly the loss of body language and the fact that the trust and intimacy achieved through personal contact was absent. (It was also impossible to be shown additional documents by informants. While these could be e-mailed later – if the informant remembered! – many respondents were reluctant to allow this material to go beyond their control lest it fall into other hands, as could easily occur with electronic communication. It is much easier to show something and then lock it away again than it is to scan a document and send it electronically.)

Interviews were recorded, transcribed and confirmed with informants in the normal manner, but were treated throughout the project as supplementary to documents.

Despite this, the interviews revealed five facts relevant to the project:

- Very few of those consulted were familiar with all aspects of the course accreditation process. While more than competent to answer questions about their own role, most seemed uncertain of the contribution made by others, particularly in the administration.
- Most informants were ignorant of the risk management policies and practices of their institution. While this was not true of those directly involved with the management of risk (Directors of Risk, etc) these people admitted a corresponding lack of knowledge about the course accreditation procedures of their university.
- It was notable that few academics had any appreciation of the administrative aspects of course accreditation, while administrative informants showed a similar lack of understanding about the academic input (Instead both sides made constant complaints, with administrators whining about defective documents and failure to adhere to deadlines, and academics about an unnecessary bureaucracy)
- Despite this, both academics and administrators agreed that the material published by their university was accurate and current, and as far as it went, was a reasonable representation of

what was required when proposals were submitted for approval. Few, on the other hand knew who had prepared these documents or the source from which they had originated from within the university. (Some ventured a governance support unit somewhere or an unknown policy writer who anonymously submitted papers to Academic Board, but few seemed able to identify the actual author or ghost writer)

- Virtually all informants noted the ephemeral nature of the procedural documentation of their university, noting that the depiction of both course accreditation and risk management procedures were in a state of constant evolution, even if the intent and actual practice remained largely unchanged.

In the end the researcher was glad that a decision had been made to concentrate on documents as sources of information rather than interviews. The interviews fill gaps and supplied confirmation, but rarely generated new material.

Figure 6.1 summarises the nature of the documents examined and their amendment by informants is shown on the following page.

## 6.6 Summary

This was a study based essentially on documentation – on material produced by the universities and displayed on their websites or otherwise made available to the world at large. Interviews were used to fill gaps or to correct misapprehensions but proved incomplete as a source of primary data. As the vast majority of interviews were conducted by phone a protocol was developed to avoid distraction and to ensure that both researcher and informant remained on track. This enabled specific questions to be asked and false impressions corrected as a support of – but hardly a replacement for – the data provided by documentation.

The findings that emerged from the examination of these documents (supplemented where necessary by interview) are discussed in the following chapter (Chapter 7).

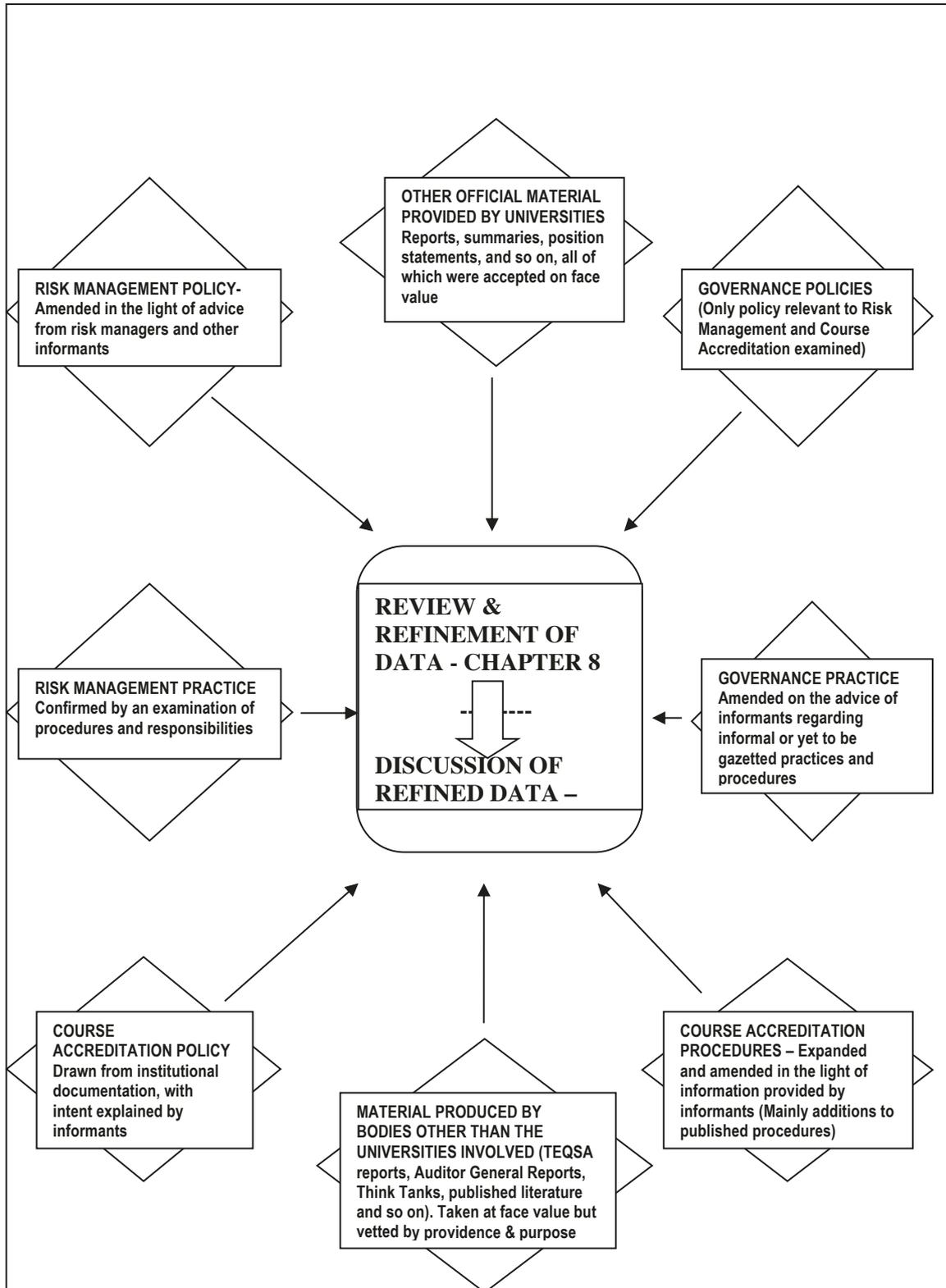


Figure 6.1 The Nature of Documents Examined as Amended by Informants

## Chapter 7 Findings

<b>Chapter 7 deals with the initial findings from the research</b>	This is essentially “raw” data as derived from the documentation produced by the universities, supplemented by the information to fill gaps or correct misunderstandings provided by informants
<b>Chapter 8 attempts to review and refine this data, and to consolidate the information specific to individual institutions into generalisations that can be applied across the sector</b>	While this Chapter provides examples from a number of universities – selected because of the range of commonality and diversity - it is not meant to be a replication of the raw data provided in the previous chapter
<b>Chapter 9 provides an analysis of this refined data</b>	The Chapter reaches the conclusion that Risk Management has indeed had a significant impact on the course accreditation procedures of Australian universities, but is implemented through a diligent adherence to protocols set by the institution rather than through dependence on the judgement of staff
<b>Chapter 10 explains the technical and conceptual aspects of the research</b>	This has been deliberately provided as a final chapter – unlike many theses in which it might normally appear much earlier – to avoid disruption to those seeking information on the topic itself (which may not be available elsewhere) as distinct from the thought processes of the researcher
	While there may appear to be repetition, this is not actually the case as while certain topics are addressed in more than one chapter, each is examined through a different lens on each occasion

**Figure 7.1 The Relationship between Chapters 7, 8, 9 and 10**

### 7.1 Introduction

This chapter gives the findings from the research. As mentioned in the Methodology (Chapter 5), the project was based around the course accreditation and risk management procedural documentation published by Australian universities, and for this reason these findings should be seen more as an exercise in documentary analysis that was confirmed by interview, rather than an attempt to gain source material from informants.

On the other hand, as explained in the chapter on Documentation (Chapter 6) there were a number of gaps in the published material – caused almost certainly by the fact that these instructions are intended for those within the institution familiar with its policies and practices – that can cause uncertainty when these papers are examined by outsiders. For this reason, it was felt essential to interview a number of staff across a range of universities to ensure that there was a clear understanding of just what occurred at each stage.

Primary dependence was placed on the validity of documents, and it was noted that there were few cases where current practice differed from what was described, an outcome almost certainly attributable to the TEQSA requirement for institutions update their procedural documentation by 1<sup>st</sup> January 2017. What was missing was much of the fine detail and, for this purpose, interviews were essential. Points lacking clarity in both course accreditation and risk management procedures were put to appropriate persons in the university concerned, virtually all of whom went out of their way to explain what was done, why it was done, and the place of the procedure within the wider context of

the university. There were comparatively few interviews of senior staff, and as these often went well beyond the operational level into a discussion of what the university would like to do (as opposed to what it actually did at the moment) the results were less productive.

### **7.1.1 Published documentation as a clear explanation of procedure**

While informants confirmed the veracity of the information published by their university, most agreed that this material might appear incomplete to outsiders as there were ellipses in the published material that would normally be filled by a staff member's knowledge of the institution and its governance. This was particularly the case with the decision making authority given to Deans (or equivalent) and the delegated responsibility passed to Academic Boards by the institution's Governing Council.

This omission was notably the case with administrative procedures. Much specialised information was omitted from these documents, such as the hidden interlocking of internal systems, complete with checks and balances, possibly because the few who would need to be aware of these matters would have already have been familiar with them from their daily activity, and to include unnecessary details such as these in the documentation would cause confusion.

Informants suggested that there was nothing confidential about the procedures of their institution, although certain things (such as details of the workings their student record system) were quarantined for cyber security reasons and are not mentioned in documentation. There were a number of local practices and short cuts that were not mentioned in the documentation as well, possibly because these were viewed as temporary measures to meet current crises, staff shortages or the need for urgency, and were not intended to become a permanent part of procedures. Most of these were minor or transitional and did not call into question the accuracy of what was described.

Few informants advised that they had received formal training in procedures, with most learning through on the job experience, by assisting at peak periods or from relieving in higher positions. As there was little if any formal training much of what was done was passed on by word of mouth as part of the undocumented practice of the institution, the single exception being those duties prescribed by legislation (such as observance of the [NSW] *Government Sector Finance Act 2018*) for which special instruction was provided, often from outside the university.

In regard to course accreditation, many informants suggested that the documentation prepared by the university was intended for those who were unfamiliar with the process - normally the academics preparing proposals for approval - rather than the administrators concerned with implementation. For this reason, most of the documents were light on administrative requirements, not because these were kept secret but simply because in the vast majority of cases, they were felt unnecessary.

### **7.1.2 The diversity of terminology between institutions**

It was found from an initial examination of the documents that there is considerable variation in terminology between Australian universities. Despite the attempts of a range of bodies to impose uniformity on the sector, (e.g. the *TEQSA Glossary of Terms 2014*, the *Revised Higher Education Standards Framework Threshold Standards 2015*, and the *Australian University Teaching Criteria & Standards 2017*) the majority of universities have retained a local vocabulary for internal use, much of which is not necessarily compatible with that used by others. Fortunately, most Australian universities have issued a Glossary of Terms (such as the multi-page *University of Sydney Glossary of Terms and Abbreviations 2004 - 2017*) although these are specific to the institution, with terms that may mean something quite different elsewhere. An attempt was made to overcome this difficulty (essentially a "learning of the language before interviews") although it was found that the use of terminology was even less consistent in oral communication than it was in print, and that a term used by one staff member (or by a particular group of staff) such as "session", "sequence", "batch", or "episode" often carried a different shade of meaning elsewhere in the same institution.

The risk of confusion was less in risk management than it was in course accreditation, possibly because of the control on vocabulary exercised by the *Unimutual Uniclaims User Guide 2008* (Unimutual is the mutual society through which most Australian universities are insured) and the obligatory language of the *Australian Risk Management Standard AS/NZS 31000: 2009* (Standards Australia 2009) that is used without exception across Australian universities (Ozdocs International 2015).

The problem of terminology will be discussed further in Chapter 8.

### 7.1.3 The focus of documents in the light of interviews

The specific questions asked of informants have been relegated to Appendix H. Informants were questioned about why their university provided such a widespread availability of procedural documents, virtually all of which were available to the general public on institutional websites. This presented the unusual situation of documents that were ostensibly for internal use only being made available quite freely to a wider audience. While not all respondents were able (or willing) to comment on this paradox – other than to suggest that it was hardly worth the trouble to make them “staff only” as this involved additional steps with passwords and IT security that was rarely justified – a number of more senior respondents suggested that these documents were ultimately addressed to two distinct audiences.

The first were those who were expected to use this material in their daily work, and this meant almost exclusively the staff of the institution publishing the document. The other audience was more diverse and involved all who needed assurance that structures were in place to justify their continued confidence in the institution. Of the two, perhaps the second was more important from an institutional perspective. While there was a need for a standard and consistent response from staff in the performance of their duties, this rarely required the depth of detail contained in these instructions. The availability of publicly accessible documents was therefore more an exercise in reputational assurance, whereby institutions provide far more than their moral (or legal) obligations require, simply to ensure that the community can continue to trust and respect their local tertiary provider.

A number of respondents suggested a third, and perhaps even more attentive audience – regulators such as the Tertiary Education Quality and Standards Agency (TEQSA) and the other State and Commonwealth agencies responsible for the oversight of tertiary education, such as the State Auditors General or the various state Departments of Fair Trading or equivalent.

Informants suggested that because of this wider audience many of these documents contained far more detail than would be required or expected by the staff of the university. This was particularly the case with the course accreditation procedures republished by many universities in 2016, which informants explained had been revised and expanded to meet TEQSA requirements, even though the process within the institution remained largely unchanged. Informants further explained that TEQSA now required documentary evidence demonstrating that:

- 1 Course design is appropriate and meets the Qualification Standards
  - 2 Course resourcing and information is adequate
  - 3 Admission criteria are appropriate
  - 4 Teaching and learning are of high quality
  - 5 Assessment is effective and expected student learning outcomes are achieved
  - 6 Course monitoring, review, updating and termination are appropriately managed
- [TEQSA 2016]*

Informants suggested that while these outcomes had long been pursued by Australian universities there had been little need in the past to include them in published instructions as these were matters that would be taken for granted by staff. This had changed with the emergence of external regulators, and virtually all informants who commented upon this point suggested that it was ultimately for the eyes of regulators that the current procedures had been written and made widely available.

#### **7.1.4 Staff use of course accreditation documentation**

If, as suggested by informants, the current accreditation and risk management procedures had been written essentially for an extra-mural audience, the question arose of their usefulness to staff. Informants who had noted the dual intent behind the availability of publicly accessible material were asked whether this expanded content impacted upon the response by staff in any way, or worse, whether the additional verbiage impeded their efficiency as benchmark requirements within the university. Respondents explained that the two uses of the document – internal and external - tended to be separate and that neither contradicted the other.

Those readers external to the process, such as regulators and the general public, were more interested in the total process than in its component parts. On the other hand, those required to implement these procedures within the institution were more focused on their role in specific aspects of the process, rather than the operation as a whole. Thus, a person required to enter data at a particular stage tended to concentrate on the accuracy with which this was collected and keyed and was largely indifferent to everything else that might go on around them. A person responsible for ensuring that course documentation met an approved standard made certain that this occurred but was far less interested in how the proposal was likely to be assessed, and so on. This did not mean that those involved at a particular stage were ignorant of or indifferent to the events that preceded or succeeded their input, it was simply that much of what happened elsewhere was irrelevant to their role.

The difficulty arising from this (a point made in Chapter 5) is that few of those involved in either the course accreditation or risk management process claimed to have a total view of all that is involved within the university. (This was true even of key figures such as Directors of Risk, who might well be familiar with the hazards arising from specific threats, such as the potential for embezzlement, damage to property, or the possibility of litigation, but make no claim to an exhaustive knowledge of risk across all aspects of institutional operations, particularly the threat to reputation or the nuances of copyright).

The most that can be said is that all informants who were interviewed seemed familiar with their personal role and were competent to describe it, but few could explain the other aspects of what was involved. This was particularly the case with those factors that had no immediate effect on the person's position or standing within the university. Thus, few academics paid great attention to upgrades of the student record system, as this was something that others had to worry about, while at the same time few administrators seemed familiar with the wider issues faced by academics, including long range planning, technological change or internal politics, even though these all formed part of the accreditation process. Those further from the scene (such as the Chairs of Academic Boards, and Deans) had a broader overview of what went on but lacked insight into specific parts.

All informants stated that those of whom they had knowledge made every effort to obey the instructions of their employer (*would they tell an investigator anything different?*) but they also noted that because procedural documents could not cover every contingency, there remained considerable scope for personal interpretation. While this flexibility might make it appear that adherence was inconsistent, it was suggested that, in reality, a degree of autonomy was essential for the smooth working of the system.

### 7.1.5 The interpretation of procedures

While all informants confirmed the accuracy of the procedural information laid down in current risk management and course accreditation documents, a number felt that the text in each case was intended more as a *Statement of Intent* rather than a complete reflection of what was expected to occur (Informant 19). Thus, published documentation often represented an ideal model that universities would prefer to have implemented if everything else could be kept stable, but which required frequent compromise to meet deadlines or to address unusual circumstances.

Informants suggested that when conflict emerges between convenience and directives, university staff have several options. The first is to do everything *by the book* irrespective of the circumstances, but in the case of course accreditation or risk management this can involve delays, a need for the review of instructions, a wait for advice, procrastination, and so on, and as a result it can take a long time to reach decisions. Informants pointed out that such a delay was likely to be expensive in the competitive world of Australian higher education, and embarrassing to the person who caused it, particularly where a proposal runs the risk of obsolescence, irrelevance or is in danger of being overtaken by a competitor.

Being first to market is extremely important. You may have been working on something for years but if you're the second to offer it everyone thinks you've just copied what somebody else is doing and that it's going to be cheap and second rate (Informant 12)

There is, therefore, enormous pressure to get programs through the system as quickly as possible, although this in turn may require corners to be cut and established practice overturned.

Sometimes we have to do things quickly, get sign offs out of order, get endorsements from chairs rather than full committees, and seek special approval to get something to the Chair of Academic Committee (sic) after the official deadline. We couldn't cope if we had to do everything required by policy (Informant 14)

Informants did not necessarily regard this as a threat to academic quality.

You know that you've got three years before the first graduate [from an undergraduate degree] and you can change a lot in that time. The important thing is to get the thing up and running and work through it as you go. It's less important that a course be right at the start than that it be satisfactory on completion. (Informant 12)

Informants conceded, on the other hand, that universities try give the impression that they adhere to published procedures, even if there are frequent irregularities and exceptions.

Sometimes we have to take short cuts, but we try to keep these to a minimum (Informant 5)

Nor does the necessity to take short cuts pass unnoticed by senior executives, who are aware of the need for urgency despite their initial inclination to deplore it.

Staffing's our problem; we just don't have the people to get things through as quickly as we'd like, and sometimes we just have to leave things undone, but we try to follow instructions as much as possible (*Informant 8*)

This raises the question why, if universities are prepared to allow this flexibility, so much time and effort had been put into revising and expanding course accreditation procedures in 2016, and who the audience for this activity might be.

Ostensibly we provide this information to ensure uniformity. In actual fact we do it to satisfy the regulators. We don't do anything more than we used to do, but now we describe it more fully. (*Informant 11*)

Other informants were more circumspect.

It's not just a matter of doing the right thing. In this day and age, we must be seen to be doing the right thing, even if we're not (*Informant 8*)

Another issue raised with informants was whether there was any policing of what was required by the institution if procedures could in fact be disregarded so easily. The majority of informants explained that the rules were checked rigorously, although often not by the university as a formal entity. There was enormous peer pressure to ensure that what was intended was actually done, particularly from those who had experienced disappointment previously, and that it was this peer pressure – rather than the institution itself – that kept things honest and transparent. Thus, it was normally the staff rather than the university who assessed the process, counselled delinquents and administered self-discipline. Informants also stressed that it would be wrong to judge the norms by the exceptions. Indeed, most said that as far as possible, the published procedures of their university were always followed, and that departure was an occasional variation to meet emergencies, tolerated (or perhaps even authorised) by senior management but rarely encouraged. Use of this power was monitored by Directors of Quality (in those universities where such a position existed, otherwise by the Deputy Vice Chancellor Academic) and later by those responsible for the cyclic review of Academic Board.

We follow [*course accreditation*] policy as much as possible and only do something different if we have to. This makes things cumbersome, but we'd be in trouble if we didn't do it. [(*Informant 11*)]

The nature of the *trouble* mentioned by the previous informant varied, however. While disciplinary action could be taken against defaulters, this was rarely the case where urgency was required, particularly if it was in the university's best interest to look the other way. Informants noted that the key element in the accreditation process was approval of the proposal by the institution's Academic Board on the recommendation of appropriate staff, and that these boards rarely, if ever, questioned the

procedure through which a proposal had passed, or the manner in which it had been assessed, provided it was endorsed by the chair of the courses committee or other senior officers. If aggrieved parties felt that an injustice had been done, or that outsiders from other faculties were intruding on their territory (a common complaint at times of declining numbers and shrinking resources) there could always be an appeal to higher authority, although objections were rarely successful.

The unknown player in this field was TEQSA. An internal appeal could be confined to the institution and while it might cause hard feeling would normally be resolved with little publicity. An appeal to TEQSA, on the other hand, was a completely different matter. As far as informants were aware there had been no appeals to TEQSA on the grounds of internal injustice, and there was uncertainty whether TEQSA would even consider such a matter or had the jurisdiction to do so. [Appeals of this nature would normally go to the institution's Governing Body, and then, if they failed to resolve it, to the State Government or the courts. The former referee – the so called “university visitor” of distant memory - has long since disappeared]. At the same time the publicity resulting from an appeal to TEQSA – even if TEQSA refused to entertain it – would be enormous, and the mere threat of such an appeal (suggestive as it is of poor management within the institution) might be disastrous for the university concerned. Despite this, there was no suggestion by informants that such serious action would occur over the approval of a course or the day to day management of risk within the institution.

Despite this reassurance, the spectre of TEQSA remained. This raised the issue of documentation, not simply for course accreditation and risk management procedures but for institutional practice as a whole. The researcher noted in discussion with informants that while there had been a massive revision of procedural material across most universities in 2016, it appeared from their comments that there had been little change in actual practice from earlier years. Informants agreed, suggesting that in the majority of cases the actual practice had been little changed as most institutions felt it unnecessary to do so. There had been no complaints on the effectiveness of procedures, and the existing systems for risk management and course accreditation appeared to be working well. The only thing that had been amended (and in certain cases radically upgraded) had been the *description* of the process, a task that most suggested has been done to satisfy TEQSA requirements.

#### **7.1.6 The relationship between procedure and policy**

The researcher noted that there were a number of cases in which the accreditation or risk management practice of an institution appeared to be at variance with published procedures in different documents. In course accreditation these anomalies included the role of external advisory committees, the nature of cyclic reviews, and the role of the executive in overriding the approvals process. In risk management they centred around the role of the police (and other security agencies) in ensuring the safety of staff and students versus the autonomous rights of the university. (Most risk management procedural documents appear to have been written before the age of terrorism and avoid mention of the tension that could arise between the university and external bodies where student welfare is concerned, or where an evacuation – a major source of disruption - is ordered by emergency bodies. The manta from the Vietnam moratorium era of “No police on campus” seems to persist as a ghost in institutional thinking, even though the world in which this was framed has long since changed.)

Informants responded by stating that one of the difficulties faced by universities was their inability to keep policy statements up to date. In theory, policy should precede procedure and should shape its practice. In reality procedures often anticipated and foreshadowed policy, particularly at times of rapid change, where unauthorised amendment was needed to gain efficiency. It was only later that policy was updated to reflect these changes in procedures (Informant 29).

Informants also suggested that both course accreditation and risk management were atypical examples, as the procedures of both had been updated in response to external requirements, while the rewriting of the policy - a task internal to the university - had yet to be completed. There was no question in the mind of informants that policy would be updated to reflect what was actually going on

- it was simply that there hadn't been time to do so, nor had the task been given the same sense of urgency.

It was also explained that the issue was more complex than it might appear and depended to a large extent on the source of documentation. In the majority of instances, course accreditation and risk management *procedural* documents had been (and are) drafted by those most closely associated with their implementation, and often include revisions reflecting changes that have crept in unofficially even though they might still need to be recognized officially. *Policy* documents, on the other hand, are generally prepared by specialised units in central governance divisions that are less directly concerned with implementation and reflect a slower pace of decision making. *Procedural documents* are an indication of what practitioners are required to do to perform their role. *Policy documents* reflect the university's expectation of its members.

#### **7.1.7 Staff influence on procedures**

Informants indicated that procedures (as opposed to policy) were normally changed at the discretion of staff to reflect better, cheaper or less tedious way of achieving specific outcomes. The majority of these reforms were instituted unofficially, and only incorporated into published documents after they proved successful. It was also suggested that the fact that changes of this type could be implemented so readily assisted the empowerment of staff and made it possible for the system to meet changed circumstances. The downside was that procedures changed solely at the whim of staff could cause confusion, and to avoid this any change in internal requirements – whether official or not - needed to be widely advertised (although this did not necessarily give formal approval or authorisation) through meetings and staff bulletins.

Informants also noted that purely internal change rarely needed the approval of the university as a whole, much less Academic Board, and that, provided there was no threat to the integrity of programs, or any failure to address compliance requirements, most Academic Boards accepted procedural change without question. This enabled procedures to be upgraded quickly when the need arose. The upgrading of policy – a task that requires formal approval - was a much longer process

#### **7.1.8 The power of those servicing committees**

A number of informants expressed concern that the sheer volume of material on course approval meeting agendas made it difficult to give full attention to everything that ought to be considered. Thus, papers were scanned rather than read, and only the issues that stood out were noted or commented upon by members.

This in turn meant that a far greater responsibility rested on those servicing committees than was indicated in the documentation, particularly where compliance was concerned. All of the universities investigated had established (or were about to establish) a specific office, person or unit to manage course proposals and to shepherd requests through the approvals system. These groups were intended to be more than mere records managers or paper chasers, however. In the majority of cases, the incumbent was a relatively senior person (in age if not in status) who was responsible for checking the compliance of each proposal against current legislation (such as ESOS, AQF, the various policies of the institution, and state and commonwealth law, such as the NSW Anatomy Act 1977, or local government noise and pollution requirements). There was also a need to check proposals against institutional ethics and Work, Health and Safety (WH&S) requirements, the rules of professional registration authorities, and in certain cases (a particular issue in the Church based universities) those matters that might be contrary to the moral philosophy of the institution.

The person or unit engaged in this role had also to be certain that the proposal could be entered without difficulty onto the student record system and that it would meet all internal and external timelines. These tasks were a major responsibility and in turn involved liaison with numerous groups within the university, such as the Legal Office, the International Students Office, the Director of Risk Management, Student Administration, the Library, Information Technology (IT), the Indigenous

Services Unit and many others. The office, in summary, acted as a filter and anything considered inadequate or unsatisfactory would normally be sent back for amendment. (The Academic Programs Office at UTS, although it does not perform all of these roles, is a typical example.)

While many of these activities were nominally the preserve of faculties (and in most universities items such as a Library sign off, an IT sign off, an International Office sign off, and so on, are normally required before endorsement can be given by Faculty Board, and hence entire the institutional approval process) the complexity of the task - as well as the need for tact in following up laggards diplomatically - required a dedicated and experienced staff. It was also noted by informants that, in a number of universities, the office or person responsible for the shepherding of course proposals was also charged with the organization (and in certain cases the conduct) of the cyclic review of programs and that this added considerably to their load.

The work issue aside, however, it quickly became obvious that increasing dependence was being placed on these persons or units to ensure that the time of committees was used effectively, that agendas were available and that inappropriate or ill prepared proposals that could otherwise waste time were not brought forward. This in turn gave considerable power to those exercising this responsibility, who could, if they wished considerably delay the process.

The majority of those holding these positions in Australian universities claimed that they felt ill trained for their role, and in a number of cases suggested that they had originally believed that their work would involve little more than record keeping and an occasional liaison with other units, or alternatively the taking of minutes and nothing more. Most of the staff in this position are at HEW Level 6 with others at Level 6A+ or Level 7, while a few are at HEW Level 5 – the last perhaps an interesting reflection of their responsibilities as originally perceived by their university. Few felt comfortable with the responsibility or saw it as an effective career path.

Other informants (both academic and administrative) suggested that the ultimate impediment to efficiency in course approval was the excessive amount of material contained in documents, and a lack of time to read and consider them. This was combined with a need to be up to date on all current legal and compliance requirements, as course documents tended to encompass every aspect of what might be involved, whether relevant or not, perhaps in an expectation that such searching information would be required by courts or future regulators.

Not all informants appeared frightened by TEQSA in its present form, however, and a number of more senior staff expressed greater concern about the threat of litigation, and the potential for harm to the institution's reputation through the approval of inappropriate proposals (or in Risk Management, a failure to take full account of risks). Informants suggested that to counter this, the vast majority of universities sought protection through requiring extensive and exhaustive documentation, with as much information as possible and all risks identified well in advance (Cohen 2016).

Nor was this fear of the courts a matter of idle speculation (as perhaps the threat of TEQSA might be). At the time that data was collected one of the most frequent points raised by informants – as shown by a review of transcripts - was Section 3.3 of the report of the Productivity Commission on Australian Higher Education (Productivity Commission 2017). This section (*Consumer Rights and Restitution for Inadequate Educational Quality*) noted the difficulty that plaintiffs had had in prosecuting Australian universities under consumer law, as before action could commence the courts had to be persuaded that these institutions were in fact engaged in “trade or commerce”, and hence within the jurisdiction of this legislation, a point strongly disputed by university lawyers who claimed that the universities were distribution their largess as “charities” (Informant 31). To avoid further confusion the Productivity Commission recommended that the legislation be changed to confirm the responsibility of universities for achieving promised outcomes (Page 31).

This had far more teeth as far as informants were concerned, with the only defence against this being complete and open documentation, similar perhaps to the way in which nurses protect themselves by recording *everything* in their notes. This includes both the course proposal – which would may well become the primary pillar in potential litigation – and the procedures themselves, together with

Competitive markets for normal goods (such as consumer electronics) are generally covered by an implied warranty under the Australian Consumer Law (ACL) for faulty or inadequate products. These kind of warranties reinforce the rights of consumers to expect decent quality products and create strong incentives for the provider to ensure high quality provision. Equally, providers that make misleading or false claims about the nature and quality of their products would also be liable under the ACL, as this would constitute misleading conduct..... (*Recent events*) have not only opened up the possibility of legal action for misleading conduct (for example, a university that marketed a course as led by an internationally renowned academic when it was not) but also for provision of inadequate services.

A legal commentator has recently concluded that “In Australia, a successful claim by a student for compensation for careless or incompetent teaching may well be just a matter of time” (Cohen 2016)...It is notable that law firms are warning universities to undertake strategies to avoid liability, such as having good quality control procedures in place for staff, random supervision of lecturers and solicitation of students feedback.

**...It would be worth adoption of similar (*to the UK*) provisions in Australia. In particular this would involve making it clear that the ACL *does* relate to higher education, and giving the student the right to a refund, other compensation, or the “right to a repeat performance” in the event of unacceptable teaching quality. (Productivity Commission p 31 – 32) [The bold type in the final paragraph occurs in the original document and may reflect the harsh feelings of the Productivity Commission on this matter]**

appropriate evidence that every effort was made to deliver what had been promised.

Corones (2012) suggests in his advice to Australian universities that not only should as much as possible be documented for legal purposes, but that universities should be equally proactive in making certain that staff obey implicitly the procedural directives of their institution:

The advent of the new quality and regulatory agency, TEQSA, with its brief to monitor compliance with the strengthened AQF, and the new consumer guarantees under the ACL(Cth) provide urgent incentives to higher education providers to ensure that reasonable standards of program delivery are maintained. ....consumer guarantees strengthen the hand of international and domestic students as consumers of educational services. Higher education providers need to confront their legal obligations under these new laws and to put in place quality assurance and compliance programs that will limit their exposure to liability. [Corones 2012]

The end result was a massive increase in documentation, a burden that was ultimately unsustainable, but which had been imposed on the higher education sector by necessity. Informants agreed the sheer volume of material was unwieldy, and that this was an issue to which Australian universities were becoming increasingly sensitive without any end in sight. This was particularly the case for those writing course proposals. All Australian universities now prescribe the format in which these documents must be submitted – a demand justified by the need for commonality and administrative efficiency within the institution and for legal protection outside. This in turn led to an expectation that documents needed to be complete and uniform before they could be considered for approval. It was also a matter that caused endless frustration, particularly when administrators (who academic informants claimed to have little insight into the true value of what was proposed) send back submissions that were perfectly sound from an academic point of view.

Some of the documents we receive are really rough. No one knows what is intended, we can't put them into perspective and they fail to meet other institutional requirements. As far as academics are concerned much of this is a frustrating and needless bureaucracy. (Informant No 12)

Administrators defended their actions as essential for their own protection as well as that of the university

They [those proposing courses] must follow the template, and if they don't, we have to send them [the proposals] back. If we don't, we'll be in strife ourselves later. (Informant No 5)

Of particular interest was the way in which issues were resolved when academics (including Deans) felt that proposals were satisfactory but where administrators declined to accept them on technical grounds. Informants advised that compromise was normally reached through negotiation, sometimes through the agency of the Chair of the accreditation committee or other senior officers, and sometimes through meetings with the faculty Dean. Academic informants also felt that in certain cases, the technical requirements of the institution were unnecessarily rigid and inflexible, and that it would often be better if proposals that didn't fit the standard undergraduate or postgraduate model (such as certain industry partnerships, or sandwich courses) were considered solely on their merits.

The quest for uniformity may promote efficiency but comes at a cost as there can easily be delay while uncertainties are resolved, and this may be sufficient – if close to the cut-off date - to delay the

commencement of a course for a further year. Informants suggested that in practice, and to avoid disadvantage to the university, senior management was more likely to intervene under these circumstances and authorize a departure from established practice.

This raised the question of whether administrative staff could be deliberately obstructive and hold back items with which they disagreed on personal or philosophic grounds, such as degrees in the Complementary Therapies, or in sports such as Golf and Surfing. Informants explained that while this might be possible in theory, they were aware of few instances where it had occurred as, in almost all cases of this type, management would intervene to ensure that delayed proposals went through.

A more critical issue concerned the reward that diligence secured (the image of the patient unthinking administrator working patiently for no reward is as false as that of the academic in his ivory tower) and whether it was worth it. A surprising number (of males at least – females avoided the issue) appeared to feel that it was not, and that work in course accreditation should be seen as stepping stone to more important roles with less stress and greater job satisfaction. While time prevented further exploration of this issue it would appear that most Australian universities are in peril of administrative fatigue, and that this in turn may have a significant impact on the place of risk in course accreditation. This will be discussed further in Chapter 8.

### **7.1.9 The role of TEQSA**

While much was said about the demands of TEQSA, informants reminded the researcher that this organization has little impact on the way in which Australian universities conduct their internal procedures. TEQSA, for its part, requires evidence that universities have a strong and consistent process for assessing courses and for managing risk, but has never made any attempt to prescribe how this should be done, nor (at least to the present time) has it insisted on a standardisation of procedures from one provider to another. This contrasted with the haste accompanying the major revision of documentation that had occurred in 2016, which respondents suggested was a knee-jerk response by managers who were uncertain of TEQSA's powers at the time or its willingness to make use of them (Informant 29).

There was little that was negative about this, however. Informants felt that TEQSA had made three significant contributions to university operations (a field much wider than course accreditation or risk management, although areas beyond these were not explored). These were:

- The presence of TEQSA had done much to make universities live their game, to think about their intentions, and to justify their decisions – at least to themselves if not to outsiders, in the way that the sight of a policeman may deter errant motorists even if no arrests are made. The rush to revise documentation was only one indication of this change in attitude.
- TEQSA had caused Australian universities to think more seriously about long term risk. It was not that university behaviour before TEQSA had been particularly risky (Australian universities have always been under the strong hand of government – a restraint that prevented risk even if it limited innovation) but the emergence of TEQSA required the universities to think more deeply about the long term implications of risk – a contrast to the short term vision arising from the three to four year terms of Australian parliaments that has been a frequent problem in Higher Education (Council for International Education 2018)
- TEQSA has legitimised the previously assumed power of university administrators, as it is administrators rather than academics that have contact with Canberra. (Academics have contact with Canberra through the Australian Research Council, administrators through TEQSA). This has meant that to a large extent administrators have been given the right to do things in their own way, as opposed to working in the shadow – or at the direction - of their academic brethren (Meyers 2012 – a situation Meyers finds most regrettable, particularly his bitter Chapter 7 – *“Management versus Academic...No Contest!”* - page 127 - 153).

Informants noted that while a cognizance of risk had long been a part of the approvals process, its assessment had tended to linger in the shadows while more obvious things, such as the content, relevance and rigour of proposals was given priority. TEQSA had changed this, not by reducing the emphasis on these matters but by making risk management co-equal with them. Hence, virtually all procedural documentation now placed greater emphasis on risk, although informants were divided on whether this was more than a lip service to satisfy regulators, while the institutional practice remained much as it had ever been. It was found valuable to note the differing response from various groups (explained in the following sections).

## **7.2 The feedback from specific groups of informants.**

As the choice of informants was explained more fully in the Methodology chapter (Chapter 5) it will not be revisited. It was noted, however, that as particular groups tended to focus on specific issues, perhaps as a reflection of their interest and involvement in the process, their comments should be included in this chapter.

As explained in Chapter 5 the informants interviewed for this project fell into one of five categories:

- Those from an academic background
- Those from an administrative background
- Those from a professional support background
- Those from a managerial background
- Those from an executive background

While there was a degree of overlap between these categories, the features found most frequently in each of these group are described below.

### **7.2.1 Academic informants**

Academic informants appeared more interested in the outcome - essentially the approval of their proposal – than they were in the process through which approval was gained. Their main concern was the complexity of what was required (part of which was felt to concentrate on needless trivialities) and the impact this had on the time taken to reach a decision. It was also noticed from a post-interview review of transcripts that the vast majority of academic respondents tended to concentrate on the content of course proposals, followed by the rigour with which that content would be assessed, rather than on the viability or marketability of the program or its effect on the institution.

The accreditation process was seen by academic informants more as a peer reviewed quality control measure that enabled inferior proposals to be eliminated (and more favourable products confirmed) before they were offered to students. From this perspective, course accreditation becomes a largely advisory activity, within which those delivering the program can be guided by the mutual experience of colleagues. If there are defects, these should of course be amended and, if uncertainties occurred, they need to be resolved, but by and large course accreditation was seen solely as an assessment of the academic merit of proposals, with a value assessed by its contribution to student attributes.

Much the same applied to risk. Academic informants were more than aware of the risk inherent in course proposals but tended to view this as an internal rather than an external issue involving, for example, the possibility of obsolescence, the indifference (or intractability) of students, or the danger of irrelevance. As a result, risk was seen as something under the control of the staff member or course coordinator, who could limit its development through careful monitoring and appropriate upgrading.

The same was true of the few academic supervisors interviewed. Risk was seen as something within the control of the course coordinator, who through care and prudence should be able to see difficulties emerging and take appropriate action. Where larger risk existed (such as the long-term adequacy of

resources) a similar responsibility fell on the university. From this perspective risk was completely manageable and could be detected – and appropriate advice offered – through a pool of experienced peers. The course accreditation process was seen as one of the channels through which this might be done.

### 7.2.2 Administrative informants

The term “Administrative Informant” is used in this section as a catch all phrase to embrace all who might be responsible for some aspect of the accreditation process other than the actual development of proposals. The category is not confined to those who form part of the official “administrative establishment” and includes the members of the various committees associated with this activity, many of whom may hold senior academic positions in their university, but whose involvement with course accreditation is that of an assessor or processor rather than that of a producer. The key distinction was involvement. If informants were directly involved in some aspect of the accreditation process, other than as course developers, they have been included in this category, irrespective of whether their employer regards them as members of the academic or administrative community. Those who were not directly associated with course accreditation, but who made some contribution at a distance, such as library or IT staff, are not included in this grouping, but their comments will be summarised shortly under the heading of *professional informants*.

While there are obvious differences between the perspectives of academics and their administrative colleagues, it was felt important to concentrate on their shared commonalities first, and only later to discuss what the differences between them – which were far fewer than the commonalities – might be.

The administrative informants as a group tended to be far more interested in the process than their colleagues engaged in proposal development. The basic argument was one of equity and uniformity as opposed to the mere following of a ritual. Informants suggested that unless all course proposals could be examined in a similar manner, using the same philosophy and procedure (albeit modified to suit the level and circumstance) there was a danger that anomalies could pass undetected that might harm the welfare of students and the reputation of the institution. Thus, the great danger was inconsistency in procedure and a failure to take all details into consideration. While there may be a considerable difference between, say, the content of an award in Engineering and the content of an award in Fine Arts, both should be required to meet the same criteria before being approved.

Informants from this group suggested that the greatest difficulty was one of uncertainty. Course proposals pass through many hands, and staff turnover is frequent. To counter this there must be some overarching framework that will minimise the dissonance of individuals, and hence this is the reason why universities provide strong procedural guidelines. At the same time, it is important to note, as stated previously, that few administrative informants felt that these guidelines were harsh, restrictive, or indifferent to the immediate circumstances. Rather it was suggested that the procedures published by tertiary institutions should be seen more as a set of standing instructions – the way things ought to be done under normal circumstances to ensure that significant issues are addressed, and that proposals can be tracked and monitored. Risk arose from the possibility that this might not be done.

Within this rigidity, however, the manner in which these strictures should be implemented was seen as a matter of professional judgement, where there could be considerable flexibility allowed to academics and administrators, provided the boundaries established by policy were respected. This was particularly the case with new types of award (such as blended learning), or awards in a new discipline, where the practices of the past might no longer be appropriate.

There was a marked difference in this regard between academics and administrators. When new types of award emerged, academics tended to see them as new ventures for which established practices might be insufficient and hence new directions should be taken. Administrators, on the other hand, saw the processing of new types of award as an extension of existing arrangements, with the proposal to be accommodated within current practice as much as possible.

Administrative informants suggested that as far as course developers were concerned, every course proposal – even those that replicated existing programs – appeared to be seen as a separate entity, similar perhaps, but different from its fellows in the same portfolio, and hence quarantined from any of their failings. Each is a complete “one-off”. To administrators, on the other hand, every course, old or new, formed part of a continuum in which there was little difference between programs other than perhaps their date of approval, as all needed to be managed and handled in the same way. Thus, to those from an academic background every course may require a different focus as accreditation panels address new needs, while to administrators it would seem essential that all proposals be treated in the same way irrespective of content or audience. The implication of this is discussed in greater depth in the following chapter.

Risk, to the majority of administrators, was something that was beyond their control and no longer their responsibility. No one wanted courses to fail, but provided this failure was not caused by administrative negligence or incompetence they could do little to avert this happening. One of the purposes of the accreditation procedure was to ensure that risk could be foreshadowed, but unlike the response from academics “risk” in this context was considered external, such as a change in government policy, or a decline in international enrolments, rather than the internal issues of outdated equipment or an obsolete curriculum. Risks of this type could neither be avoided nor controlled by the institution. The most that could be done was to prepare contingency plans that could be brought into operation as the risk matured.

### **7.2.3 Professional Support informants**

Professional informants are those with an interest in the approvals process but who are not directly involved with decision making, such as Librarians, IT staff, the International Office, and so on. While in certain cases representatives from these bodies may be voting members of the institution’s course accreditation committee (or equivalent), this is rare, and the few informants with this dual role were excluded from this category.

In the majority of instances, professional groups within Australian universities indicated their concurrence with a proposal through nothing more than a signature, with perhaps an optional comment on the document. This is normally done in complete independence from - and generally without any liaison with – all other professional bodies within the institution. (Thus, the Library might willingly sign off on a proposal that the IT Division refused to countenance without either being aware of the position taken by the other.)

One outcome from this was a narrowing of interest. Informants from the professional staff advised that those signing off course documents tended to be interested solely in the manner in which a proposal would affect their division or unit, not how it might impact upon the institution as a whole. In the majority of cases there were only two issues. The first was the question of funding and resources – could the proposal be serviced within the current budget, and if not, how might services to other areas be trimmed? This involved no question of the merit or otherwise of the proposal, nor was there any interest in the relevance of the course or its contribution towards the institution. The key point was whether the service could be delivered, and if so at what cost.

The second issue was similar and involved the expectation that a successful proposal might engender in the minds of others. Informants suggested that once a professional group agreed to provide a particular service there was often the false hope that similar proposals would receive the same level of service. This might not be possible, particularly if resources became threatened or restricted. Thus, a sign off - which to a course developer might seem completely straight forward and justified - might be delayed (or withheld) not because the professional unit happened to be unable or unwilling to service it, but because of the commitment it established for the future.

Informants suggested that few of those assessing courses were aware of the risk faced by professional units in agreeing to service a proposal. Agreement, once given, was extremely hard to retract, and professional staff had to be certain that no commitment was made that could not be delivered. This included provision for the loss of staff, the obsolescence (or failure) of equipment, and the possibility of greater demand from existing users.

Risk in this case is one of personal skill and integrity – the danger of promising more than can be delivered, with failure reflecting badly on the person who signs the document. This is a different type of risk to the internal threat faced by academics or the external challenges faced by administrators.

#### **7.2.4 Managerial informants**

The term “Managerial Informant” is used to describe those responsible for the oversight of the process rather than those directly involved with it; a category that includes figures such as Deans, Chairs of Academic Boards, Senior Administrators and Heads of Units. In certain cases, informants who might normally be placed within this group are more closely involved with the accreditation process (for example as members of course accreditation committees) and for clarity their response has been included in 7.2.1 and 7.2.2 above.

As a general rule, managerial informants tend to be more interested in the operation of the course approvals system rather than in the assessment of individual proposals. This in turn involved the diligence with which staff made use of established protocols, the speed with which new developments could be moved through the system, and the learning experience gained by the institution. For this reason, there was an emphasis on measurable objectives, such as meeting deadlines and reducing costs rather than unmeasurables such as “quality” or “integrity”. Thus, it is not a matter of how sound any particular proposal might be - although no one from this group had any wish to see sub-standard courses being approved or delivered - but how well the accreditation system served the university.

Managerial informants were among the few who raised the question of the cost and the disruption caused by the multi-faceted nature of the course accreditation process, much of which might well be necessary, but which at the same time should also deliver an adequate return to compensate for the effort involved. (Librarians, for example, pointed out that they received no additional support to confirm the adequacy of their collection for new courses, and that the time taken – generally in the months of May and June when demand on the library was at a peak – could only be made available at the expense of normal duties.) Most of the other groups seemed indifferent to the cost of course accreditation or risk management.

The majority of informants from the managerial group were in favour of a simplification and shortening of the procedure, provided this had benefit for their group and had little impact on the outcome. All managerial informants agreed that a rigorous assessment of course proposals was necessary, but most were equally consistent in their view that the system itself should be seen as nothing more than a means to an end, and that its value depended on its efficiency (based on cost) as well as its effectiveness.

Risk in the case of managerial informants was seen to lie more in the possibility of a systems failure caused through a shortcoming within their division or unit, or through systems obsolescence - in other words a failure of procedures to keep pace with the changing demands of the lecture theatre or improvements to technology. Many considered that there were a number of legacy factors that could well be eliminated from the accreditation process (such as the distribution of hard copy documents or the need for papers to pass through multiple hands) provided these imposed no impediment to the procedure. At the same time, the vast majority of these informants felt a need to maintain the features with which their own staff were familiar, as this – together with the lack of a common practice across units and divisions - prevented interference from outsiders. (As will be explained further in Chapter 9 incompatibility between systems was sometimes seen as a means for job protection. The risk in this case being that jobs and status will be lost if positions are consolidated and control surrendered.)

In general, managerial informants were not as greatly concerned about external risk as their executive counterparts (discussed in the following section). While all members of a university are affected by changing circumstances, and thus all face risks in common, most of those holding managerial positions felt that there was less need to worry about those that it was impossible to influence and to concentrate on those for which they carried responsibility.

### **7.2.5 Executive informants**

Time constraints and the non-availability of informants prevented a major interview of university executives, such as Deputy Vice Chancellors (Academic) or equivalent. The few who with whom course accreditation was discussed appeared less interested in the specifics of the approvals process than their managerial or academic colleagues and felt that a more important aspect was the outcome achieved rather than how that outcome was derived.

As might be expected, the perspective of senior staff was wider than subordinates, and was essentially institutionally focused, with course accreditation being only one of the many aspects of university operation with which they were concerned. While none would have been happy with the approval of sub-standard programs there was less interest in how or why this could occur, with greater emphasis placed upon what the consequences might be for the institution.

Informants in this category suggested three areas of risk, all of which were external. The first was the risk to reputation that an ill-considered proposal might bring. This was particularly the case if courses were seen to be trivial or irrelevant by the public or stakeholders, or alternatively if their level or content was not one with which a university should be involved (a serious matter with courses below AQF Level 7 – “We mustn’t be seen as a rebadged TAFE!” -Informant 27). It was suggested that in the end, all courses should support research – an issue not addressed by those in lower positions – and that staff should ensure that graduates were employable.

Despite this, there were concerns about the complexity of current procedures and the time required for its implementation. This was particularly the case where proposals required for strategic reasons were deferred for technical failings, and most executive informants had felt it essential to intervene on occasion to ensure that the institution’s portfolio could be kept timely, current and relevant for the greater good, even if this involved taking short cuts with procedures.

The second area of risk involved finance. At a time of straitened resources, few universities could afford to offer programs which were not financially viable, and while it might be possible to subsidise those awards that an institution might be expected to offer to maintain its learned status, such as Law and Medicine, there could be little support for programs that lacked a sound business case. This applied even to programs such as Honours (now being phased out by many universities) which had never been money makers in their own right, but which provided other benefits to the institution.

The third area of risk involved regulation, and here the future was uncertain. While most executives felt that their institution had little to fear from regulatory bodies such as TEQSA, there was concern that any indication of a weakness in the governance of a university, including the failure to have adequate systems of management and control, would be viewed unfavourably by the Commonwealth, and that this could impact on future funding. (An interesting point, as here it is the Commonwealth as paymaster rather than TEQSA as policeman that needs to be feared, something that did not occur with other informants). Hence – this group said - the majority of universities tried to make their operations as transparent as possible, and this included the accreditation of courses.

While few executives were interviewed, those who were suggested that their views were likely to be typical of the group as a whole. While the course approval process was rarely an issue of concern – it functioned smoothly, operated harmoniously and produced viable results in each of the institutions

examined – it was considered something that needed to be carefully monitored, not simply because of the risk of failure but as one of the touchstones used by external bodies in their review of universities.

More will be said about the approach to risk by the various groups (and its effect on course accreditation procedures) in Chapters 8 and 9.

## **7.3 Reasons for departure from established norms**

### **7.3.1 What are established norms?**

Established norms are those normally used in the processing of course proposals in a particular university. Any addition to, or variation from, this standard practice is a departure from the established norm.

This does not mean that all proposals are processed in the same way in the same institution. A number of universities have a slightly different procedure for the approval of Honours and postgraduate coursework degrees, or for the approval of VET or sub-degree awards when offered by dual sector institutions. There is normally a standard procedure for all awards at the same level within the same university, however, with any departure from this viewed as exceptional.

For the purposes of this research, the established norms were regarded as those published by the institution as part of its course accreditation procedures. It was found that in the majority of cases universities encouraged adherence to these norms but were prepared to allow - although not necessarily encourage - variation when necessity required.

### **7.3.2 Time pressures**

Informants were asked for an explanation where it was noted by the researcher that a significant departure from published procedures appeared to have occurred. Almost universally the explanation involved the pressure of time, a situation caused by tight deadlines and (some suggested) the inability of those involved earlier in the process to get their work completed before some critical time point.

This in turn lead to a need for decisions to be made under executive authority, particularly at times when staff were not available (such as during extended vacations) or where it would be impractical to recall committees for the discussion of a single item. In the majority of cases, decisions made under executive authority were noted as such by Academic Boards, thus preventing the practice becoming standard. In a few cases, proposals approved by executive action were subsequently referred to the Courses Accreditation Committee (or equivalent) for noting, but informants suggested that this was ultimately a pointless action as it would be impossible for these bodies to record an adverse finding after a proposal had been approved.

Informants were aware of the risks inherent in approval by executive action and explained that in the majority of cases at least two signatures were required, with the second one being the Chair of the Courses Accreditation Committee or the Chair of Academic Board. There were few cases in which proposals could be approved by simply one person.

Three reasons were given for time pressure. The first was the need to meet external deadlines, particularly those imposed by admissions centres. It was not impossible to seek an exemption, and while it was possible to list courses as *subject to approval*, excessive use of this term was unlikely to give confidence to potential applicants.

The second was the fact that many proposals were delayed by course developers (and even more by faculty boards) until close to a critical deadline. This meant that there was an extremely heavy workload immediately prior to the July meeting of Academic Board (the normal date by which proposals for the coming year must be approved). This strained resources and the availability of staff.

The third was the need to remain competitive in a cutthroat environment where informants suggested that the quest for students was becoming a major component of every institution's business model.

### **7.3.3 The need to remain competitive**

Informants suggested that the need to remain competitive provided another reason for departure from established norms as it was essential for programs in demand to be approved quickly. This generally involved an acceleration of proposals through the course accreditation system rather than the elimination of particular stages. This acceleration could involve stages being taken concurrently that would normally occur consecutively, or the seeking of executive approval for certain aspects (such as the availability of library resources) in lieu of the signature of a unit representative.

One difficulty noted by administrative informants was the fact that while a program could be approved quickly should the need arise; it was often hard to accelerate the administrative procedures needed to provide support. This was particularly the case with restricted and contract courses (i.e., AQF courses offered under contract to a particular sponsor or employer that are not available to the general public). The majority of these programs needed to be mounted quickly to meet the terms of the contract, and this in turn could lead to the absence of items that staff would normally take for granted, such as the availability of class lists at the first lecture. Worse, it could mean that students might be unable to access electronic resources (such as Learning Management Systems) until well into the semester, particularly if enrolment was postponed until the first day of lectures. Informants noted that while special attention could be given to the demands of individual programs - essentially by sacrificing other tasks - the situation became more difficult when there were a number of these courses, with the proponents of each demanding that their particular programs be given priority.

The risk in these cases was that mistakes would be made through haste and inadequate checking, particularly where the students were indifferent to class attendance, could avoid financial liability or where sponsors required the keeping of rolls. While most mistakes were confined to a misspelling of names, more serious errors could arise where students were enrolled into the wrong course, where names were omitted altogether, or worse, where material support (such as the availability of classrooms) could no longer be confirmed. In these cases, it would be the administrative staff who were likely to be blamed – something that these informants would like to avoid completely.

### **7.3.4 Disruption caused by inexperience**

Informants advised that in certain cases the unavailability of key administrative staff may cause various stages of the process to be overlooked or delayed. In the majority of cases, staff who were unavailable were replaced by others relieving in higher duties, virtually as a form of apprenticeship, and the process allowed to continue. There was always a risk, however, that these substitutes might not have the experience or insight to make appropriate decisions, or worse, might allow proposals to proceed with defects that the permanent occupant of these positions would decline. As a result of this, a number of universities preferred to wait - even if this caused delay - until the regular staff returned to duty.

The issue of staff training was discussed with administrative informants, most of whom advised that no specific instruction was provided for course approval. Most of what was gained came from an association with the process (including the performance of subservient roles under the direction of an experienced monitor) rather than from a prepared training program. There was even less preparation of academics, a matter that caused concern to informants. (Staff development units could provide advice on content and delivery— and were proactive in doing so in most universities - but were rarely in a position to assist staff with accreditation requirements. The pressure of time and a concentration on specific aspects of the process as part of their duties prevented a similar service being offered by administrators. The result was endless frustration, a position deplored by everyone.)

### 7.3.5 Special programs

A number of universities have an amended approval process for special programs (i.e., courses neither funded nor recognised by the Commonwealth, such as programs requested by employers for the training of staff, community courses, certificates of attainment, or sessions involving practical work in labs, workshops and specialised facilities, all of which involved input by the university but were not intended to meet the requirements of the AQF). These courses differed from those in the previous section (which dealt with the urgency caused by sponsored students taking non-portfolio AQF awards) and their assessment may be less rigorous than required under normal circumstances. Few objected to this as sessions of this type were a valuable source of revenue that most universities regarded as a profitable sideline, but there was always the danger that laxity in the processing of these special programs could affect the diligence with which normal awards are assessed. The majority of universities have countered this by insisting that all teaching programs - whether standard or individualised - should be processed with equivalent rigour, using the same standard procedure.

Despite this, informants advised that a number of short cuts were often permitted with special programs to reduce the processing time, such as allowing more frequent approval by executive action (often needed when contracts required an immediate commencement of teaching), a reduction in documents and a streamlined administrative procedure. Informants also suggested that the steps that universities insisted on retaining for these programs – such as prior internal consultation - might well be an indication of the importance placed upon these things by the institution, and could therefore be used to identify what the university believed to be the “core” of its course accreditation procedure.

The factors that were identified varied from one informant to another, but most noted that universities were reluctant to overlook any of the following in either special or regular course proposals;

- The merit and relevance of the academic content
- The Business Plan
- The effect on resources (staff, accommodation, and equipment, including use of the library)
- The effect on students (particularly the risk of a decline in enrolments into as students seek cheaper alternatives – known in Higher Education as the “siphoning effect” where cheaper but inferior courses draw off students who are looking for a credential rather than an education – Dew & Nearing 2004)
- The consequences for industrial relations (the staff delivering these programs are often paid at a higher rate than those teaching in the normal manner and this may cause resentment)
- The effect on the reputation of the institution.

It was notable that there was little mention of content, the assessment of students or the attainment of graduate attributes in special programs - all matters that receive considerable attention in standard awards - unless it was intended that these receiving this instruction should feed into existing awards on completion (as in certain enabling programs). In most cases special courses were viewed as peripheral or ancillary to the university, although still requiring the normal services of the administrative divisions.

### 7.3.6 Other reasons

There are a number of other reasons for universities to depart from established norms, including a lack of supervisory monitoring, last minute changes by course developers, or a failure to update course documentation should a change be made.

Informants suggested that virtually all of these were one off rather than systematic incidents and, as such, were atypical of the accreditation process at their institution. A greater concern was expressed about changes that occurred after approval without corresponding amendments to the deposited copy of course documents, to the point where what was being taught in the classroom might be noticeably different from what had been originally approved. This generally arose when change occurred

between the point of approval and the commencement of teaching (which could be several months in many universities). Informants advised that there were procedures in place to monitor all but the most trivial of changes once a permanent course coordinator had been appointed, but before this the reporting of change – often to meet convenience, staff shortages or budgetary requirements - tended to be no one's responsibility, and this was a weakness.

While the majority of published procedures terminate at the point where a proposal is approved, a number of informants advised that their universities assumed that courses would continue to be monitored as part of the accreditation process until students were enrolled and teaching commenced, or in some cases for the whole period of approval. Much of this appeared to be done on an ad-hoc basis, with responsibility for feedback resting with the faculties, while most of the work to update records was done centrally. It was notable that there was little provision for advice to those involved in the accreditation process once courses had been approved, until perhaps their courses fell due for reaccreditation or were subject to cyclic review. (Most universities use "satisfaction surveys" to assess the feelings of students and staff but the results are normally sent to the faculties or those teaching the course rather than to Academic Board. Informants considered this a weakness, as Academic Boards gave approval but lacked the means to monitor what might occur thereafter, and hence were unable to learn from the experience).

There was another factor as well, that one informant called the "midwife approach of academic boards". Put simply, a midwife is concerned with the birth of a child but not with its subsequent development or its passage to maturity. As soon as one accouchement has finished the midwife attends to the next, often under pressure of time. In the same way academic boards concentrate on the matters immediately before them and may lack the time or resource to follow up on past decisions. This in turn prevents learning from the past, or worse, establishes inappropriate precedents that may be cited to its detriment in the future. Nor is this likely to be detected in the cyclic review of academic boards which concentrates on major issues rather than fine detail. The end result, however, is a drift away from what is prescribed, and this can cause further departure from established norms

## **7.4 The influence of external bodies on the accreditation process**

### **7.4.1 External Regulators**

Informants noted that while Australian universities were free to choose their method of accreditation, there were a number of external bodies whose requirements were mandatory if graduates are to practise their profession. These include the Nurses and Midwives Board of Australia, the Medical Board of Australia, the Psychology Board of Australia, the Tax Practitioners Board, and so on. While these bodies were not directly involved in the accreditation procedures of the universities themselves, they remained extremely interested in all awards that fell within their jurisdiction, and no institution could afford to ignore their requirements.

The same applies to those professions where registration is not compulsory, but where membership of an appropriate body, such as the Australian Computer Society, the Royal Australian Chemical Institute or the Australian Property Institute is highly desirable. No university could disregard the requirements of these bodies either, and their wishes needed to be considered – and almost always implemented - as part of the course approval process.

Informants advised that on 9th March 2016, Universities Australia (as the joint representative of Australian universities) signed a Memorandum of Understanding with Professions Australia (the representative body of professional registration authorities and professional bodies) to ensure that there would be no future conflict between the accreditation procedures of both groups (Universities Australia 2016). While this agreement was expected to take some time to implement, a number of informants suggested that it was likely to have significant impact on the accreditation practices of Australian universities and may in fact lead to the joint accreditation of all proposals that require professional registration or facilitate membership of a professional body.

While a number of informants appeared unaware of this agreement (which appears to have been publicised more on an administrative than an academic level, and to have been little discussed by academic boards) others were extremely vocal, suggesting that while the agreement had been designed to protect the independence of universities and professional bodies it may in fact lead to centralised joint accreditation procedures in the future, under which proposals would be considered by a single committee containing representatives from both groups.

The Universities Australia document states:

Australian universities' academic self-accreditation processes are regulated and assured against the Higher Education Standards Framework by the Tertiary Education Quality and Standards Agency (TEQSA). It is recognised that a complementary approach is necessary to harmonise the separate academic and professional accreditation processes and avoid duplication of effort.

In this context, the accreditation processes of both the government regulator through TEQSA and the professional accreditation bodies are undertaken in a way that accords with the general principles of proportionality, risk, necessity and shared responsibility. *[Universities Australia 2016]*

Informants noted that TEQSA was also engaged in collaboration with professional bodies and professional registration authorities, and that the combined influence of these groups was likely to have a significant impact on course accreditation procedures. The TEQSA website states:

TEQSA is building relationships with a broad range of bodies that have a statutory responsibility for regulating a profession and for accrediting related professional programs, for example, professional registration and accreditation bodies in medical and legal fields. ...we are also in the process of developing a list of professional bodies with whom TEQSA can share higher education information under section 193 of the TEQSA Act. (TEQSA 2016b)

The majority of those who were aware of these developments felt that while the members of Universities Australia – essentially all Australian universities - hoped to maintain control over their individual course accreditation procedures this may prove impractical once TEQSA and its professional affiliates become more closely engaged in the process and demand greater standardisation for the sake of efficiency.

#### **7.4.2 Compliance with statutory authorities**

While the requirements of TEQSA and other regulators tended to occupy the attention of staff, Australian universities are obliged to comply with the expectations of all statutory authorities at a Commonwealth, State and Local Government level, and that the need to ensure compliance exerts considerable influence on the course accreditation procedures of all institutions. Examples frequently mentioned by informants included the need to address all aspects of current Anti-Discrimination legislation (with respondents noting the subtle differences between State and Commonwealth requirements, all of which must be adhered to by universities), privacy provisions, environmental legislation, Safe Work Australia directives at both a State and Commonwealth level, and Australian Consumer Protection Law (including the provision of educational services to overseas students).

Informants also noted that at a local level, universities are required to comply with all the requirements of municipal government, including noise and nuisance regulations, building codes, traffic management, signage and waste disposal, and even the behaviour of students, particularly in university controlled housing. In addition, there are numerous Acts of Parliament applying to specific disciplines, such as the NSW Anatomy Act 1977, the Human Tissue Act 1983, and the Animal Welfare Act 1992, each of which needed to be considered when proposals likely to involve these requirements are discussed.

Many informants expressed the view that knowledge of these matters was moving beyond the expertise of “lay” committees (in other words, groups whose members were not specialist in the field) and that in future greater dependence would need to be placed on the Office of the Legal Councillor (one of the many names given to the legal unit in Australian universities) in the accreditation of courses.

### **7.4.3 Benefactors and philanthropic organisations**

While Australian universities are funded from government sources, research activities and student fees, virtually all informants noted that this was barely sufficient for the day to day operation of the university, and that increasing dependence was being placed on benefactors and philanthropic organisations for special projects and institutional renewal. As there are few wealthy individuals prepared to donate to universities in Australia, much of this additional funding needed to be sourced from the corporate world. Hence, virtually all universities were careful lest their behaviour inadvertently restrict this source of income. While philanthropic bodies were not directly involved in the accreditation process, informants suggested that universities took pains to avoid anything that might place them out of favour with donors, and as such the influence of benefactors on course accreditation, while indirect and often unnoticed, remains significant.

Informants suggested that the areas where this caution most applied included environmentalism, ethics and populism. There was no suggestion on the other hand that benefactors actively discouraged universities from offering any field of study or that they interfered in any way with academic decision making; it was rather that the universities imposed a pro-active self-censorship of their own to avoid putting potential donors offside.

Informants also noted that as the Commonwealth was the greatest current benefactor of universities it was even more essential to keep voters on side and to meet community expectations, and that this was part of the accreditation and risk management process.

### **7.4.4 Community expectations**

It would be mercenary to suggest that the only reason for Australian universities to maintain the confidence of the community rested in issues of finance and future revenue. At the same time, informants reminded the researcher that universities were dependent on the community for many aspects of their operation, including their future students (*international as well as local entrants, as an unwelcoming community could completely undermine overseas recruitment*), the use of land and exemption from rates and taxes, and the forgiveness of any disruption caused by institutional activities including research. In return, the institution provided local employment and parochial status, to the point where any suggestion that the work of a university be downsized was likely to be firmly rejected by community pressure.

It was for this reason that universities went out of their way to ensure that their accreditation procedures and risk management strategies were fully integrated with communal expectations. Three examples were cited, although none had immediate consequences for course accreditation;

- The first concerned the relations between the university and local government, with most universities outside the capital cities appointing a university/municipality relationship officer to ensure that both sides were aware of the intentions of the other and to smooth any difficulties that might arise. This was particularly the case where the discontinuation of courses (rather than their approval) was concerned.
- The second involved the use of university and council facilities (such as sporting grounds) on a reciprocal basis. [Informants noted that this could involve the university in considerable expense, particularly where the grounds were used by outsiders, as the university was not simply required to maintain the playing surface but to provide toilets, change rooms and parking areas, together with staff to supervise and clean these facilities, often at weekend rates of pay]
- The third was the appointment of local dignitaries (such as the Mayor) to university governance bodies. As far as courses were concerned, universities went to considerable length to ensure that local sentiment remained favourable, and that campus risk management - particularly fire and emergency control - was fully integrated with local agencies.

These factors were less significant in metropolitan centres, such as the City of Sydney (although extremely important on outlying areas such as Parramatta, Liverpool or Wollongong) as the multiplicity of universities in capital cities made one-to-one relationships difficult. In place of this, the dominating factor in the major centres was peer pressure, with each institution keeping a close eye on its compatriots. Despite this, community pressure had considerable impact on what was taught and the courses that could be approved.

#### **7.4.5 Peer pressure**

Australian universities are subject to a constant (and often critical) review by other universities. While this affects all aspects of institutional operation, the need for acceptance by peer institutions is vital for both course accreditation and risk management. Informants explained that while all Australian universities are required by legislation to recognize the awards conferred by their compatriots under the Dawkins Unified National System (Croucher, Marginson, Norton, & Wells 2013) they are not obliged to give similar recognition to the subjects leading to these qualifications should students apply for transfer before graduation. If a university doubted the rigour of course assessment or the quality of teaching elsewhere it could make this obvious through a denial of credit for previous study - something that most of “donor” institutions were anxious to avoid. In a similar manner, if it was suspected that an institution might be engaged in risky behaviour (particularly if this is likely to harm the reputation of the sector as a whole) it can be quickly pulled into line by its fellows through a process of shunning and non-cooperation.

Informants also suggested that while pressure of this type received little publicity it remained a consistent factor in the self-regulation of the sector, particularly in the governance of universities.

### **7.5 University governance, course accreditation and risk management**

#### **7.5.1 What is meant by university governance?**

As mentioned in Chapter 2, the term “governance” carries a range of meanings in higher education. Balderston (1995) views it as a top down system of management whereby executives impose leadership and discipline on an unwieldy and uncoordinated academic community. Shattock (2002) on the other hand sees it as an autonomous system of self-regulation within which competing interests surrender personal benefit for the sake of others. More recent writers, such as Blackman & Kennedy (2009) see it as a shared relationship based on knowledge management, whereby scholars protect the interests of their fellows against external threats. Others again, such as Capano, Regini, & Turri

(2016) see governance as a network structure within which rules are established and procedures established through common agreement between participants.

A slightly different approach was taken throughout the thesis to ensure conformity with an Australian understanding of the term, which has been determined largely by the definitions suggested by TEQSA (2016):

Academic Governance is the framework of policies, structures, relationships, systems and processes that collectively provide leadership to, and oversight of a higher education provider's academic activities (teaching, learning and scholarship) at an institutional level.

TEQSA (2016c) states elsewhere in the same document:

Traditional functions of academic governance include a rigorous scrutiny and peer review of academic activities, carried out independently and separately from the staff who are directly involved in those activities...The nature of academic governance presupposes that it will incorporate academic expertise and experience sufficient to provide leadership, judgement and scrutiny at the level of academic activity concerned.

It would appear from this that the governance of Australian universities consists of the formal and informal mechanisms used to ensure staff accountability, based on a mutually agreed code of behaviour, rather than on imperatives imposed by an institutional hierarchy. As a consequence, while governance carries responsibility it also provides a degree of latitude in its application, where staff are not intended to be robots who blindly follow orders, but caring and responsible officers who work for the welfare of the institution (Larkins 2012).

This presents a paradox in regard to both course accreditation and risk management procedures. All Australian universities issue quite specific instructions on the way in which these courses are to be examined and risks assessed. The essential question is how these instructions are interpreted by staff and implemented in the workplace. This again is a reflection of governance.

### **7.5.2 Informants' views on the governance structure within which they work**

As mentioned in Chapter 5, informants noted that course accreditation was a shared activity in which material is passed from stage to stage, with few if any individuals having complete responsibility for the process from beginning to end. It was found, however, that while informants had a clear understanding of their own or their unit's contribution to the process, few had a comprehensive overview of how staff in the units or divisions responsible for other stages were managed or coordinated, the tasks for which they were responsible, or how their work was allocated or evaluated. This in turn gave rise to unreasonable assumptions, often leading to accusations of unnecessary delay or pedantic bureaucracy on the part of those further up or down the chain.

Interviewees suggested that universities attempted to overcome this by issuing clear directives, but that these should be seen more as a guide to what ought to be done rather than mandatory instructions about what needed to be done under all circumstances. Thus, the course procedural documents of most universities tend to specify the outcome to be reached at the end of each stage rather than how

these outcomes should be achieved. This in turn gives freedom for each group to approach emerging issues in its own way. (There are no instructions, for example, on how course accreditation committees should do their work. What academic boards require is evidence that the work has been done and a just recommendation made, rather than how this conclusion was reached)

Informants suggested that this was important for two reasons. The first was that it provided the flexibility to cater for new initiatives, and the second was that by allowing minor change where justified it provided a path for future reform. At the same time there was a risk that individual initiative could cause unintended harm, and for this reason any departure from established norms had to be applied with discretion.

### **7.5.3 The impact of governance structures on accreditation procedures and risk management**

Informants - both academic and administrative - advised that as a general principle they were expected to use their initiative rather than simply work to rule. This was particularly the case with new developments (such as electronic delivery) for which there were few, if any, precedents. While the use of initiative carried an element of risk, staff felt that as long as they adhered to policy and could justify any departure they might make from established practice they would be protected by the institution.

It was also noted that many activities (such as data entry and records management) involved specialist staff whose work was more closely supervised by peers rather than by those involved in other stages of the process. As a result of this, supervisors tended to be more interested in the technical performance of their group (such as effective data management, consistent keying or the accurate reporting of numbers) as opposed to the application of these skills to specific activities, such as the accreditation of courses or the assessment of risk. (“Keying is the same whether enrolling students or recording marks – get it right no matter what you’re working on” – Informant 28)

One area that did cause concern (and was noted by numerous informants) was the clash between the hierarchic nature of the administration and the flat structure of academia, and the effect this had on tasks involving both. This disconnect meant that where issues needed to be referred to superiors the response took much longer in administrative circles than it did in faculties, simply because the matter had to go “through channels”, and there were far more of these in the administrative hierarchy than in the simple relationship between lecturer, supervisor and Dean. This led to misunderstanding and frustration and presented a serious impediment to the management of course accreditation and risk.

An example frequently cited concerned requests for an extension of time. The granting of an extension was easy and informal in academic circles. The person concerned saw their supervisor, explained the problem, and if justified an extension might well be granted on the spot. This was rarely possible in Higher Education administration, as delay at one point could throw out of kilter all other stages in a cycle. Thus, requests for extension required consultation and compromise, and approval could not be given hurriedly

Informants noted another effect as well. The informal nature of agreements in academia meant that these were rarely documented, and thus remained unknown to third parties. This was satisfactory while the enactors retained their position and continued to perform their duties. If one moved or became otherwise unavailable the inevitable result was confusion. Thus a Dean may advise a staff member that they would be acting as “facilitator” while a proposal moved through the approvals process (course coordinators are normally appointed only after a proposal has been approved, and those developing courses are often too busy to answer enquiries or provide liaison, hence the need for a “facilitator”- often a more junior member of staff where the role is seen as an apprenticeship). The advice is likely to be completely oral, and announced no further than Faculty Board, while the person concerned presents themselves to the administration and is then regarded as fulfilling this role. In the meantime, the Dean reallocates duties, takes the original person away and appoints someone else without any advice to the administration. This means that when there is a need for an enquiry,

administrators may waste considerable time trying to determine who the current facilitator happens to be, often while under severe pressure from other directions. It would seem that the informality of academics presents a constant challenge to administrators, while the rigidity of administrators presents a continual headache to academics (Barrett, Rubaii & Pelowski 2008) a matter that informants suggested was rarely absent from the areas in which they needed to work together, such as course accreditation or risk management. (Other examples involved clashes between lecturers and timetable staff, teaching staff and IT providers, and deans with embedded administrators.)

#### **7.5.4 The impact of local autonomy on risk management**

Informants agreed that there was a danger that local autonomy, in many areas of university operation, not simply course accreditation or risk management, could lead to unintended consequences through a failure of situational awareness - in effect, an inability to grasp all information. This could be minimised through the avoidance of “one-person” decisions made without consultation or guidance. Informants noted that, in most universities, risk management guidelines were established by the institution as broad and general principles that could subsequently be applied by individuals to specific cases. Professional judgement was required as to where a particular case fell within these guidelines, however, and there was a danger that unnecessarily rigid policies would be disregarded in an attempt to address specific circumstances. For this reason, decisions needed to be made as close to the sources of information as possible

Informants also advised that in the vast majority of Australian universities, risk tended to be located in one of three domains. The first was financial, and risk management in this area was intended to prevent financial loss. The second was harm to persons or property, and the avoidance of accidents. The third was a threat to reputation, and the risk in this case was a loss of public confidence in the institution.

Course accreditation fell across all three areas but was not centred in any, and hence there were few precedents that could be carried over from other fields. There was also a risk that a need for urgency may prevent due consideration of all factors, and this in itself imposed its own set of dangers.

### **7.6 Risk Management in Course Accreditation**

#### **7.6.1 The responsibility of staff for risk management**

While acknowledging that risk existed, few informants believed themselves personally responsible for its management, at least in course accreditation. Informants agreed that they would be liable to blame if approved procedures and safeguards were disregarded, or if action was taken contrary to policy, but viewed this as a protection for themselves rather than the institution. In essence, none of the persons interviewed felt themselves responsible for the risk incurred by the institution, with most tending to regard this as someone else’s business rather than their own.

This was particularly the case with financial and reputational risk, which, if recognised in advance through the course documentation could only be advised to Senior Management, without the proposal being prevented from going further.

There is little we can do to prevent a course becoming a financial disaster or giving us a bad name. If senior management is aware of this but still wants it to go ahead, we’ve no power to stop it [Informant No 3]

Intervention was more likely when there was a risk of harm to persons or property, with the majority of informants considering their legal liability and the danger of being an accessory before the fact.

If something's dangerous we can say *No* and ask for it to be revised. At the very least, we can ask for an OH&S review before letting it go further [Informant No 3]

Despite this, few informants were conscious of risk beyond these three categories and could give little insight into the wider or strategic risks discussed in the next section.

### **7.6.2 Types of Risk**

Few informants, other than those engaged in planning or strategic management, seemed aware of the risks faced by courses beyond the previously mentioned issues of finance, safety and reputation. Those who were prepared to discuss this in greater depth felt that risks could be divided into two broad types – those within the control of the institution and those beyond this control.

Discussion followed on the nature of these risks, and the input of informants was consolidated to produce the diagrammatic summary on the following page (Figure 7.2).

Most informants suggested that those risks within the control of the institution could be handled through effective foresight and managerial care, with the institution preventing small problems becoming large. On the other hand, those risks that were beyond the control of the institution needed to be addressed through contingency planning.



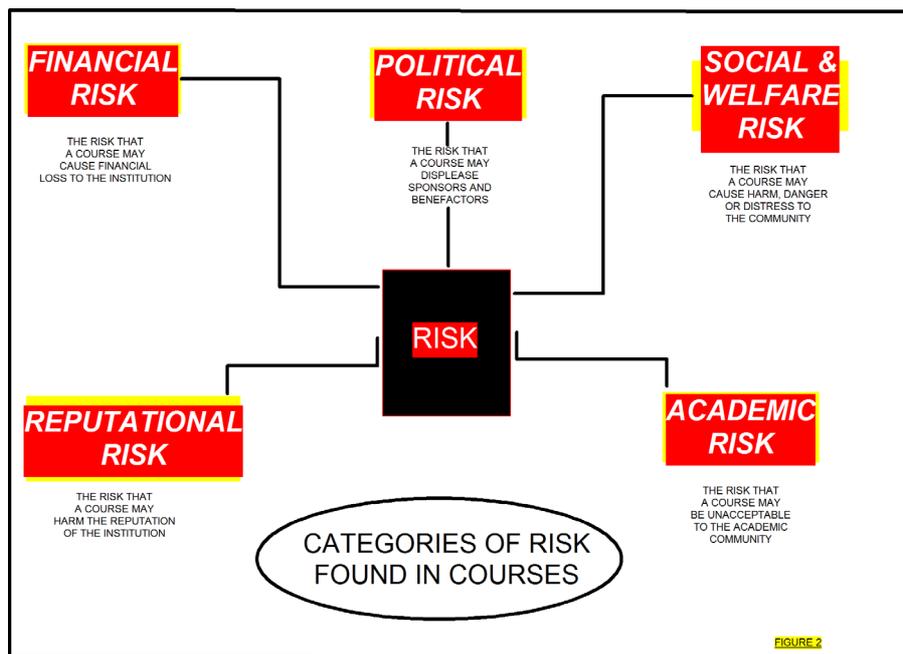
FIGURE 1

Figure 7.2 Higher Education Strategic Management Risk and Vulnerability Factors

Informants suggested that institutional managers sometimes confused these two (*those within the control of the institution and those beyond its control*) and that this was often the case in course accreditation. While numerous suggestions were offered on the types of risk found in courses, it was possible with the aid of informants to identify five main groupings:

- Financial
- Reputational
- Political
- Social and welfare
- Academic.

These can be summarised as follows:



**Figure 7.3 Categories of Accreditation Risk**

Informants advised that all five of these areas depended upon factors that were both within and, yet at the same time, beyond the control of the university. Other risks, however, were not, and could only be mitigated through constant monitoring and effective contingency planning. Informants also advised that in virtually all universities each of the five areas was assessed by a separate group (or by the same group acting in a different capacity). Thus, in the case of financial risk the recommendation to proceed was made by those familiar with finance; reputational and political risk was managed by the senior executive; social and welfare risk by the professional staff; while academic risk was assessed by a panel of academics.

Informants also suggested that under normal circumstances risk is assessed in the sequence shown in Figure 7.4.

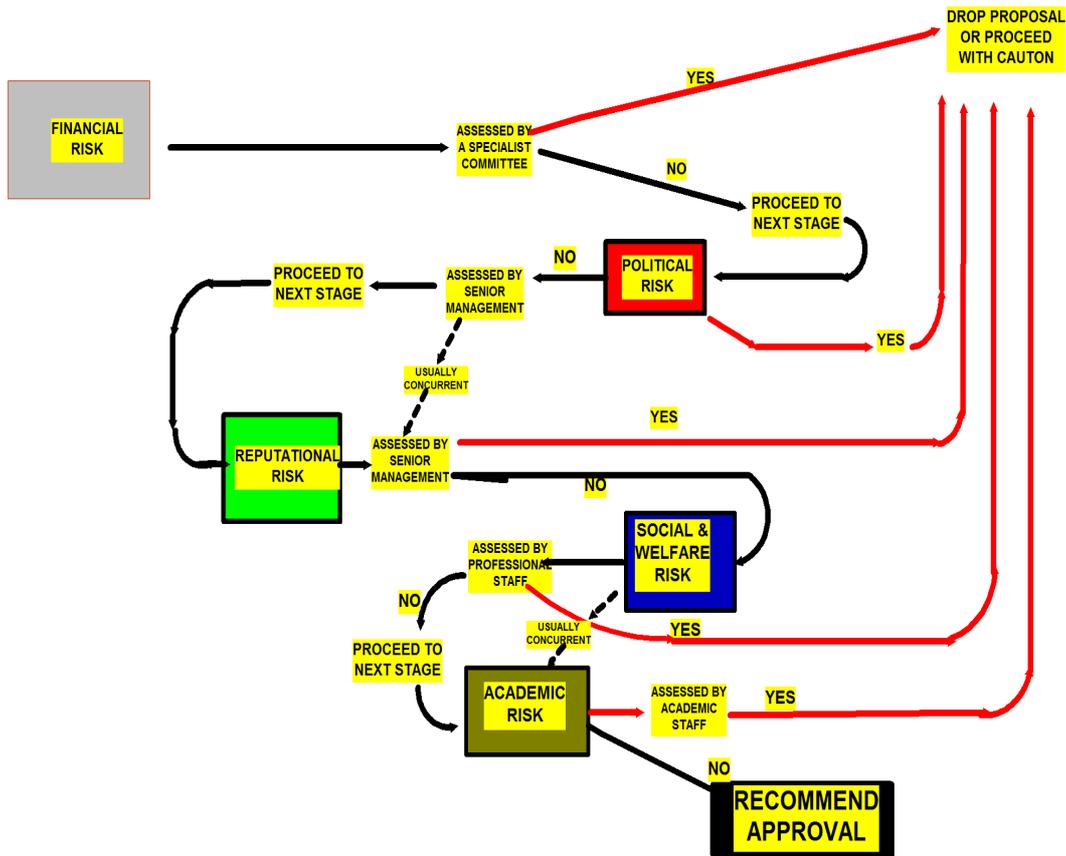


FIGURE 2

Figure 7.4 Sequence of Risk Assessment

As can be seen from this diagram, where courses are concerned financial risk is assessed first, then political, reputational, social and academic risk. For convenience it is usual for political and reputational risk to be assessed at the same meeting (normally by senior management and their advisors) and for social and academic risk to be considered jointly by another group, usually the Courses Accreditation Committee (or equivalent). The last mentioned committee normally has representatives from professional and academic staff and is empowered to make an appropriate recommendation to Academic Board.

Two options are available if risk is identified. The proposal can be dropped – although this normally means that it is sent back for remediation rather than abandoned entirely – or it can proceed *under caution*, with all identified risks made known to subsequent committees. If risks continue to accumulate as the proposal passes through the system, it can be declined.

Informants suggested that, as a general rule, the most difficult hurdle to overcome was financial risk, and that if a proposal could pass unscathed through this specialised committee it will normally be approved subject to modification at later stages, as most of the other types of risk can be mitigated through a reshaping of the course. If, on the other hand, the Business Plan is unviable the proposal is unlikely to proceed further.

Political and reputational risk are normally assessed concurrently, with the political risk first. If the political risk is minimal (in other words if there is little danger that the course could displease benefactors) the possibility of harm to the reputation of the institution is considered. If neither are felt to be of consequence, the proposal passes to the next stage.

Social and academic risk are also considered concurrently. Social or welfare risk involves the possibility of harm to society or to participants and includes moral as well as physical dangers. (*“A course that teaches students to lie may be as dangerous as one that exposes them to unguarded machinery” – Informant 5*). Academic risk involves the possibility that the proposal will prove unacceptable to peers within the discipline, either because of its lack of rigour, its obsolescence, its partisanship, or its lack of breadth (or depth) and application. Social and welfare risk is normally assessed by professional staff (counsellors, learning specialists, the international office, and so on) who may not necessarily be members of the committee but whose views can be readily made known. Academic risk is normally assessed by academics, often under the guidance of external advisory committees or employers.

Informants advised that this sequence of risk assessment while, to a certain extent, applied without conscious thought, is virtually universal throughout the accreditation procedures of Australian universities.

### **7.6.3 Testing this information against published accreditation procedures**

The information provided by informants was tested by applying the risk management sequence discussed above to the course accreditation procedures of three different types of Australian university:

- Australian Catholic University
- University of Adelaide
- Charles Darwin University

All three are different. The Australian Catholic University is a privately owned (albeit government supported) institution with a distinctive religious mission. The University of Adelaide is an old established university (a so called “sandstone”) with a long tradition and a member of the Group of Eight Australian universities. Charles Darwin is a relatively new Dawkins university formed from a previous College of Advanced Education. At the same time the risk management principles described above can be seen in the course approval procedures of each.

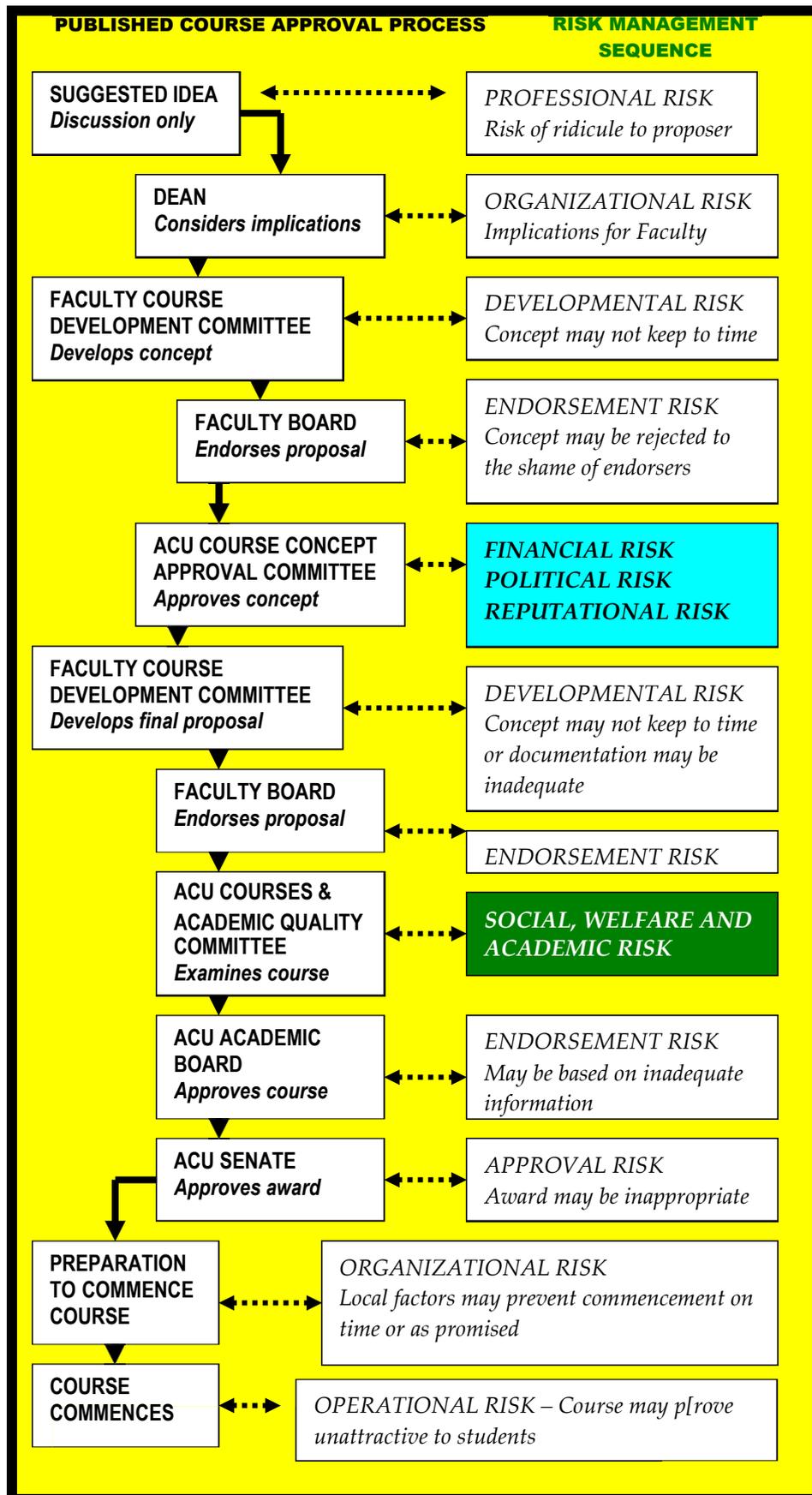


Figure 7.5 Australian Catholic University Approvals Process

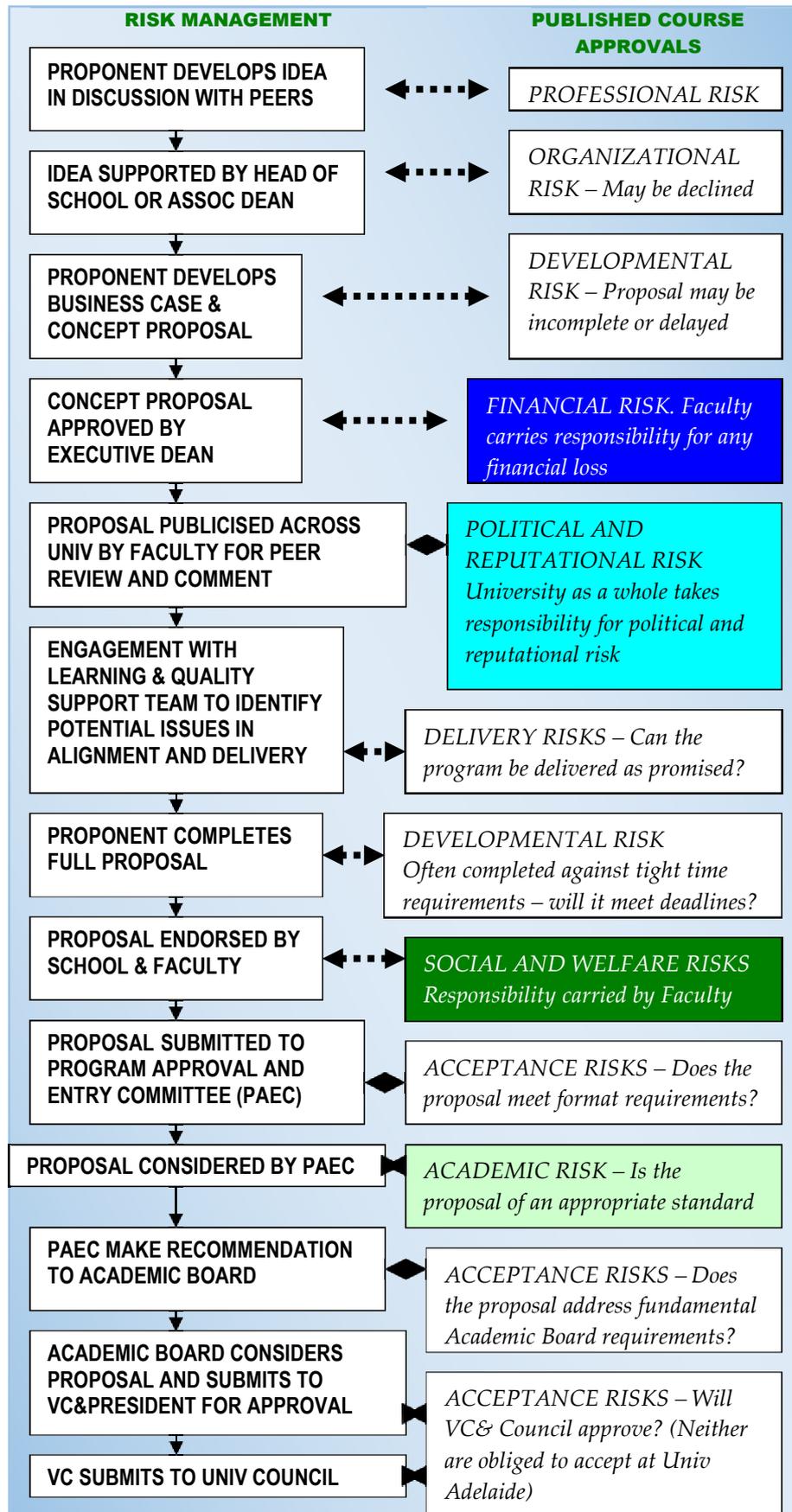


Figure 7.6 University of Adelaide Course Approvals Process

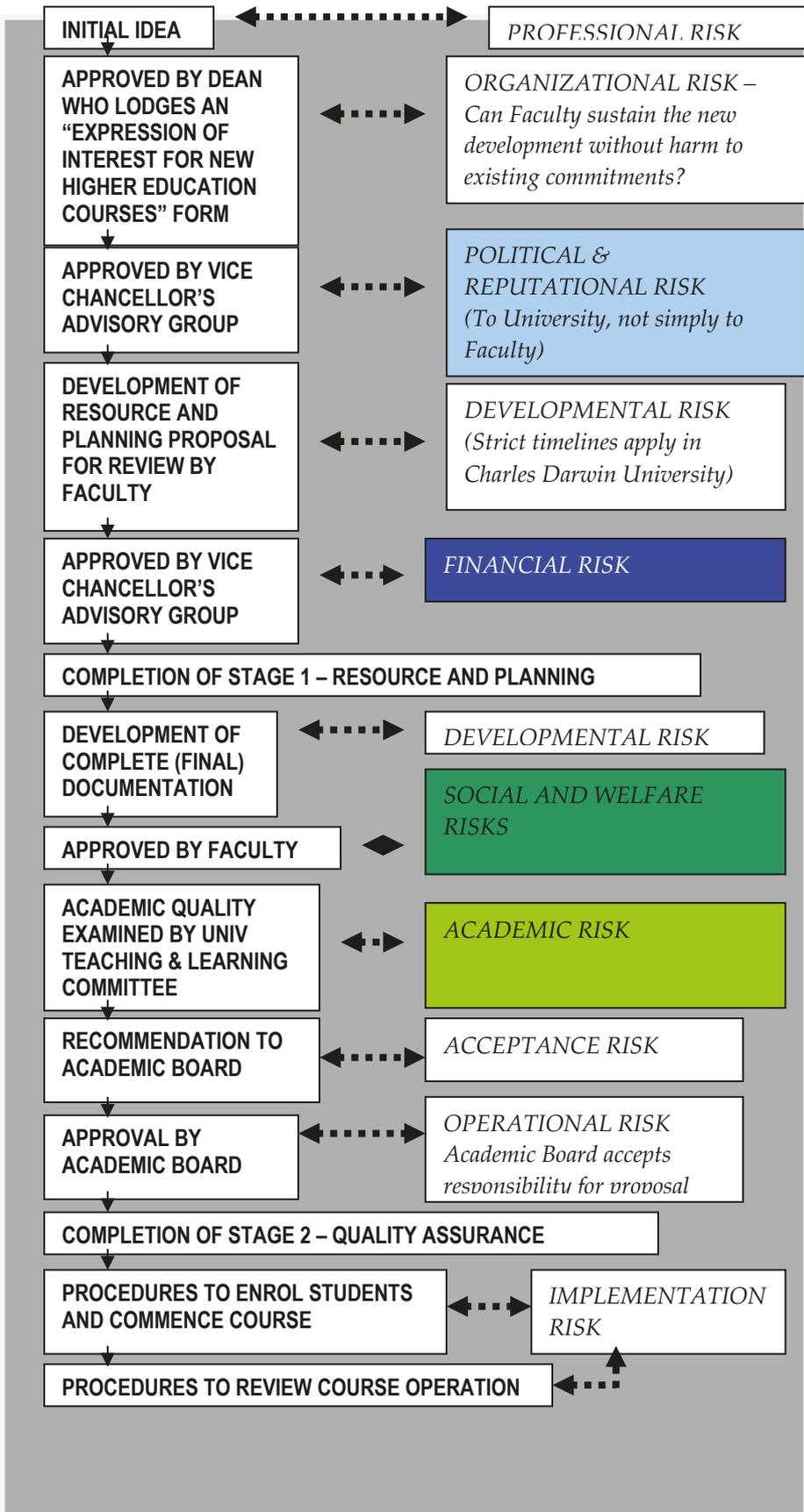


Figure 7.7 Charles Darwin University Course Approvals Process

The purpose of these flowcharts is to show the commonality of risk consideration throughout course approvals procedures in general, irrespective of differences between the practices of the universities themselves. The examples were chosen deliberately. The multi-campus Australian Catholic University relies heavily on its faculties and for this reason most of the risk management (and much of the course accreditation) is faculty based although centrally approved. The University of Adelaide places considerable power in the hands of the Vice Chancellor (it is the Vice Chancellor who approves new course proposals on the recommendation of Academic Board) and thus it is the Vice Chancellor who carries much of the responsibility for risk management in that institution. Charles Darwin University has a distinct two stage system of course approval in which the Financial, Political and Reputational Risks are considered in the first stage, while Social, Welfare and Academic Risk are considered in the second. Despite these differences, however, the same pattern of risk assessment applies in all three, thus verifying the information provided by informants.

#### **7.6.4 The views of informants on other players**

- directors of risk - Most Directors of Risk appear to be drawn from a financial or an OH&S background and tend to see risk solely from their professional perspective. While Directors of Risk exist in virtually all Australian universities informants suggested that they normally played little part in the accreditation process.
- university planners - Informants suggested that planning officers are more concerned with long term strategic risk and have little to do with the accreditation of individual proposals. The few planning officers interviewed felt that as a result of this, their influence on the institution's future portfolio of courses may be significant, but their impact on the approval of individual programs was extremely limited.
- other advisors on risk - Informants suggested that the role of other advisors differed from one institution to another but that the group could include the legal unit, senior management, university insurers and others. Apart from the legal unit (in particular cases, especially where compliance was concerned) few have direct contact with course accreditation. While external advisory groups often provide valuable advice, their input tends to be focused on the content of the course and the employability of graduates rather than any risk involved in mounting or continuing the program.

### **7.7 The relationship between risk management and administrative procedures**

Informants suggested that almost all administrative procedures found in Australian universities include a component to avoid (or minimise) risk to the institution or its staff. The greatest risk a university faces is loss of reputation while in the case of staff it is a loss of confidence by peers and colleagues. The availability of procedures and protocols provides protection to both.

#### **7.7.1 The role of university staff in risk intervention**

Staff suggested that universities attempt to limit risk through the enforcement of policy. As administrators and professional staff tend to be more familiar with policy than their academic colleagues, a greater responsibility falls on this group should a breach of policy occur. An example cited on more than one occasion was failure to comply with an institution's anti-discrimination requirements, which can often be more severe than those enforced by legislation as these can impact on the reputation of the university as well as its liability before the courts. Proposals that inadvertently breach these policies need to be identified and referred for amendment before further processing can take place.

### **7.7.2 Administrative approaches to risk management**

Administrators said they tried to avoid risk through strict adherence to procedures, the maintenance of records, and constant referral to superiors where there is uncertainty. This takes time, although this is often unavailable.

Most staff advised that they had received little if any training in risk management, possibly because the institution considered risk assessment a specialised role that fell within the ambit of auditors or Work, Health and Safety Officers rather than other staff. The majority of informants indicated that their knowledge of risk tended to come from past experience only, and an awareness of what had happened to others that they wished to avoid.

### **7.7.3 Risk awareness and risk aversion in administrative systems**

The majority of informants felt that staff would be protected if they followed the administrative procedures of their university, that the threat to personal risk was low and that risk to the institution was scarcely their responsibility. When pressed on this matter, informants suggested that while individuals could be charged with dereliction of duty if they failed to note the obvious, unforeseen risk was ultimately the responsibility of senior management rather than themselves.

Informants across the sector advised that while their institution expected prudence on the part of staff, particularly where risk was concerned, personnel were protected by obedience to policy and procedure, and its thoughtful application in their daily work. Virtually all informants stressed that this did not mean a mindless obedience come what may. Staff were expected to use their initiative in the identification of risk and to do their utmost to limit its consequences. This was particularly the case with those administrative staff who had direct contact with students to whom many things might be confided that could not be shared with others, such as complaints about poor teaching, staff unpunctuality or failure to deliver what was promised. There were few means of reporting these issues to superiors, however, and while supervisors could be made aware of measurable concerns (such as the number of students seeking leave of absence, or the frequency of requests for transfer from particular classes) it was hard to bring less verified matters, such as a ground swell of popular opinion, to the attention of the university.

### **7.7.4 The responsibility of staff**

Staff felt that they had a responsibility to identify and minimise risk, even if it was difficult to bring their concerns to the attention to the institution, and that their responsibility for the welfare of colleagues might well be greater than their duty to employers (covering the failings of alcohol dependent staff was mentioned on a number of occasions – the protection of wardrobe drinkers or lunch bingers would appear to be common throughout the Australian workforce rather than something peculiar to universities). Other measures included the preparation of contingency plans where appropriate, even if not required by the university, and the issue of warnings to colleagues where things were starting to go wrong.

Informants were asked what action they might take if they were aware of errors in course proposals (such as a major under estimation of resources in a business plan). The vast majority felt that it would be inappropriate to intervene publicly, firstly because this might be seen as an intrusion into someone else's area of expertise, and secondly because the person signing the document - such as a Dean - may hold a superior position within the institution and could retaliate. At the same time those aware of the difficulty would have a responsibility to alert their colleagues in other units and, if possible, to prepare contingency plans to counter the shortfall. (In the case of an ill prepared resource plan, this might include the ability to move staff, relocate equipment or to trim other programs. This was particularly the case with equipment dependent or lab based programs, clinical activities and those requiring extensive specialist support). The interesting point was that much of this appeared to be done on personal volition without reference to superiors, with "every person their own risk manager"

(Crickette 2012). [Crickette has had a significant impact on administrative risk management in Australian universities and her contribution is discussed at greater depth in Section 7.8.]

### 7.7.5 The responsibility of others

Staff felt that an equal responsibility fell on outsiders who might be involved in some aspect of the course accreditation process for the avoidance of risk. This included external advisory committees, regulatory agencies and risk specialists, and was particularly important in those cases where the reputation of the institution may be at stake. (Examples were given of politically or culturally sensitive programs such as the study of Arabic literature, or the teaching of Sharia Law, which were rarely of concern to those within the university but may reflect deep division within the Islamic community.)

## 7.8 The Impact of Grace Crickette on Administrative Risk Management in Australian Universities

The risk management precepts of Grace Crickette were raised several times by informants although there would appear as yet to be little mention of her work or influence in the higher education risk management literature. It was felt desirable, therefore, to explore the issue independently and to assess her impact on the current administrative practices of Australian universities.

Crickette joined the University of California (UC) in 2004, and in 2011 was appointed to the position of Chief Risk Officer for the system. (The University of California is a multi-campus body with semi-autonomous units in a range of Californian cities). In 2013, Crickette left the University of California to become Chief Risk and Compliance Officer for the American Automobile Association and, in 2015, became Vice Chancellor of Administrative Affairs at the University of Wisconsin-Whitewater, a position she currently holds.

In 2011 a University of California press release stated

One of the bonuses this year goes to Grace Crickette, UC's chief risk officer, who, according to a UCSF spokesperson, "has saved the university over \$100 million by driving down the cost of workers' compensation," and negotiating better terms with insurance companies; and the raises "are a small price to pay for people working at the highest level." In other words, Ms. Crickette's great contribution to the University of California's function as a major educational institution, has been to cut staffing, and reduce insurance coverages .... *Taken from Compass Rose 25<sup>th</sup> January 2011*

What the paragraph failed to state – possibly because the University of California felt unnecessary - was that Crickette had been instrumental in introducing both Enterprise Risk Management and the Electronic Data Mining of Risk (EDMR) to the University of California and in doing so had made a significant contribution to American higher education administration. (Further details of her history and record are on Grace Crickette Taylor's Facebook entry – Facebook 2018)

Crickette has presented on numerous occasions at higher education risk management conferences, although as most of these presentations have been reprinted solely in limited circulation professional journals her name remains relatively unknown beyond university risk managers and planning units, where her EDMR procedures are widely used (Informant 19) and there has been as yet little comment on her work by academic scholars. While these procedures – essentially algorithms for predicting the frequency and severity of risk using historic data – are important for the prediction of cyclic risk their relevance to course accreditation is miniscule, and as such EDMR will not be discussed further in the

thesis. This has not prevented a number of risk managers from attempting to spread the use of EDMR across their universities, but from all accounts its impact on the prediction of non-cyclic risks (a category that includes the risks associated with courses) has been limited, possibly because insufficient data was recorded in the past to enable the periodicity of risk cycle interactions to be determined (Informant 24).

A more significant factor has been Crickette's approach to risk in general, which appears to be rapidly infiltrating other areas of university management, including course accreditation. At risk of offering a caricature of her highly developed arguments her philosophy can be reduced to a series of directives; (Taken, but greatly shortened, from Crickette 2014)

- Attempt to control risk at the lowest level by those immediately involved, even if this involves apparent insubordination
- Report after the problem has been solved, not when first identified. (*In other words – “Don't wait around while someone else decides what to do; do it yourself, remembering that it is always easier to seek forgiveness than permission”* (A reflection of Stewart's Law of Retroaction – Bloch 2003)
- Use precedent sparingly – the past (despite data mining) may not be the best indication of the future
- Think before you act – but don't waste time in doing so
- When uncertain use common sense – don't equivocate
- Caution is not always the best strategy
- If you don't know what to do, don't linger in the hope that something will come up. Pass the problem to someone better able to resolve it
- Learn from the experience once the problem has been solved.
- Make certain that the institution maintains a high level of proprioception (*body awareness*) by requiring risk resolvers to communicate effectively before and after each event
- Maintain adequate records of risks and their resolution using standardised procedures and templates (*No doubt a reflection of her interest in EDMR*)

The difficulty with the Crickette philosophy – and a potential fear of certain universities - is that even greater danger may result if staff are allowed go off “half cocked” (Informant 24) and act independently. For this reason, staff need firm policies and procedures to set boundaries on their actions, but while safe within these boundaries should be allowed to act as the circumstances require. Unfortunately, the ghost of the former Public Service continues to haunt the administration of many universities, with staff fearful to act on their own initiative even though this lies within their power (Informant 24)

Despite the lack of comment in the literature, the Crickette philosophy of risk management (where discretion is allowed within set boundaries) appears to be gaining a foothold in the course accreditation procedures of Australian universities, and if this is the case there should be no reluctance in presenting it as a finding

## 7.9 Summary

Informants felt that there would need to be greater emphasis on risk in the future, as universities face a future of declining funds, greater uncertainty, a more competitive environment, and a more rigorous

regulatory regime. While staff and their institutions were becoming aware of their responsibilities in this regard it was felt that the effective management of risk would be an instrument of assessment used by regulators, and that would be imposed on universities whether they wanted it or not.

As discussed in the following chapter (Chapter 8) course accreditation is an area of increasing interest to governments and to Australian universities, and the issues raised are likely to become more, rather than less important in the future.

## Chapter 8 Review and Refinement of Data

### 8.1 Documentary Material

It should be mentioned again that that research has been based predominantly on documentary material made available by the universities, and that the purpose of interviews was to fill gaps in the published record and to correct any misunderstandings that may have arisen. While informants gave their own views on many matters – and these have been recorded where appropriate - it is stressed that the core of the project rests on documentary research rather than interview.

As stated in Chapter 5, there were three reasons for this;

- Because of the multiplicity of actors within the accreditation process there were few informants who could provide a detailed description of events from start to finish, while those with a complete overview of the process lacked grass roots information
- Course accreditation is both an academic and an administrative responsibility and hence was likely to be viewed in different ways depending on the background of informants
- The documentation published by the universities was readably available and believed to be accurate. This documentation might be incomplete was not believed unreliable

University documentation therefore formed the core of the project and was only supplemented where necessary by interview.

#### 8.1.1. Institutional policies and procedures

The key materials amidst the wealth of documentation available were the policy and procedure statements of each institution. The veracity of this information was confirmed by informants, although in certain cases full implementation of all that was described had still to be achieved as universities transitioned from pre-2016 procedures to those required by TEQSA from the start of 2017.

#### 8.1.2 Amendments and additions to the documentary material gained from interview

Time and travel constraints prevented the researcher from seeing course approval procedures in practice across the sector and from meeting many informants face to face. Despite this, it is felt that the informants interviewed – normally by phone - formed a representative sample of staff at a range of levels (and with widely differing responsibilities) in Australian universities.

In all, 43 interviews were held, consisting of 12 academics (all of whom had had experience in course development), 24 administrators and seven others, the last including a number of risk managers and professional staff. [It will be noted that more administrators were interviewed than academics. This was deliberate as the focus of the research was on the procedures governing course accreditation themselves rather than each informant's experience or frustration with these procedures. In retrospect there were perhaps too many academics interviewed as this group (which included Deans and executives) could relate little beyond their personal exposure to the system and there was a certain sameness in their replies – the point of interviews being to fill gaps in the documentation rather than to give the opportunity for personal reflection on the frustrations or benefits of the process.

A deliberate attempt was made to include a wide spread of administrative staff, firstly because this provides a perspective less frequently heard, and secondly because of their knowledge of events that occur behind the scenes that may be omitted from procedural documents

Four factors caused amendment to the mental image created by the published documentation:

- Differences between published documentation and practices - In a number of cases universities had yet to implement their revised approvals procedure, so that what was said differed from what was done. While the informants stated that there was good reason for this and that no harm had been done, the fact remained that unofficial variation not only existed but that it was tolerated or even encouraged by the institution.

Despite this, most variations were minor. Two examples may show what is meant. In one university the procedural document made it clear that course proposals needed to be accompanied by a sign off from the Library and (separately, but also in written form) from the IT unit. At the same time, it was quickly established that material was being sent to the *courses committee* without it. It was explained that there were representatives from both groups on the committee and that verbal approval – virtually nothing more than a nod from the staff involved – was regarded as sufficient. This may save time but leaves no record in the deposited copies of course documentation should enquiries be made in the future.

An example from another university was similar. The procedural documents suggested that all new course and subject proposals needed to be placed on the internal website (where they could only be accessed by those with a staff log-in) at least two weeks prior to each meeting. Staff could then - if they wished - provide comment to the courses committee. It was soon discovered that this was not being done. Three excuses were provided. The first was that material was rarely available at least two weeks before a meeting and even then was often subject to last minute changes. The second was the difficulty of placing material on the web, as not all material arrived in the best electronic format and sometimes needed to be printed off, rescanned or rekeyed before it could be displayed due to systems incompatibility. The third was that no one seemed to make any use of this advanced notice anyway. The committee received little comment from staff – or at least nothing in writing - and it seemed that the whole business was an expensive waste of time.

- Changes to course documentation - There were adjustments to the text of course documents while they passed from one stage to another. This occurred generally because revised documents were not returned to those groups who had originally requested these changes before being passed to the next stage. This could allow considerable (albeit inadvertent) variation to occur from the start to the end of the process, to the point where what is approved might not be the same as what was originally agreed, and this in turn could have an impact on resources.
- Material being made public prematurely - Tasks were occasionally done in advance with information entered onto the student record system (or the course information system) before receiving official approval. This was done for convenience at times of peak demand with the material quarantined to prevent it becoming active until approved. The danger, however, is that this last step may be overlooked through the pressure of business, and that unapproved (or yet to be approved) material may become prematurely active on the system. This in turn could find its way onto the course enquiry website (the site used by prospective students) and cause embarrassment if what was offered was not delivered
- administrative backlogs - there is a key date in every university by which courses must be approved for the coming year and there is constant pressure on course approval committees to get everything through by the due date. This may mean that the administrative tasks needed to support the process can be allowed to fall behind, with the intention of catching up when the pressure becomes less intense. While a common practice, this presents its own range of dangers, with the added risk of human error complicating the operation.

As a general rule, informants were aware of these problems but felt powerless to prevent them. At the same time, there would appear to be a belief in many institutions, particularly at a grass roots level,

that the published procedures should be seen simply as the *ideal* of what ought to be done rather than what actually occurred in the harsh reality of daily activity.

### **8.1.3 Cases where published documents could be misleading**

There were a number of cases where published procedures could be misleading, particularly to outsiders and those unfamiliar with the university. This could be due to the incomplete nature of much of this material, with the assumption that those working behind the scenes should require no further instruction in their duties, or occasionally through the use of terminology that has a different meaning elsewhere.

A classic example is the use of the word *staff*. The problem lies in a failure to explain who these people might be – something that is obviously clear to those using this term by custom within the institution but less certain to those outside. In a number of universities, the word *staff* appears to refer to those working behind the scenes in the administration, with *academic* added as a prefix if relevant. In other cases, the same word embraces all who may be on the payroll of the university or all involved with the accreditation process (but does it include contractors or others paid from a different cost centre, such as those in entities?) As far as can be confirmed the archaic term “servants” [*of the university*] has now disappeared from all except insurance documents, where it lingers as eighteenth century legalese, but the word itself has had no official replacement.

Despite this, there were no cases in which documents were found to be deliberately misleading, and in almost all instances the problem was one of omission or a misunderstanding of terminology rather than deceit. Despite this the issue could prove embarrassing if challenged by regulators.

### **8.1.4 Cases where published documents were obsolete**

Although there was a revision of course accreditation procedures across the sector in 2016 for implementation in 2017 there were no cases in which the procedures in published documents were found to be obsolete. There were a number of cases, however, where certain details were likely to become obsolete in the future through planned restructures, such as the consolidation of organizational units or projected changes in the student record system.

Informants were asked how this would be handled. It was almost always suggested that it would be impractical to rewrite the documents themselves (a task that had absorbed an enormous amount of time and effort in 2016) and that the easiest solution would be to add an appendix to the document (similar to a codicil to a will) showing the latest amendments. The difficulties this could produce are obvious, but informants doubted whether the resources at their disposal offered any alternative.

The difficulty was a shortage of staff and the rapidly changing nature of the environment. One of the major factors involved the use of technology (and in the case of administrative staff the need for training on updated software and computer platforms). Virtually all course accreditation systems are now based on electronic templates which course developers download and complete themselves before sending them on electronically. This saves time and is generally more convenient than paper documents. The difficulty is that these electronic lodgement systems are based specifically on current software. This is subject to constant updating, and this in turn means that the electronic procedures underlying submissions must be updated as well. In the past information in an obsolete format might have been upgraded behind the scenes as part of the procedure. This has become impossible with reduced staffing and greater pressure.

The basic problem is that few Higher Education administrators feel confident with computers and rely extensively on technical specialists for support. While administrative staff are competent in the use of existing systems for their daily work there is a fear that major retraining may be required to transition them to something new, and that any problems that arise from this will be blamed on the operators rather than the system itself. This frightens people, particularly those who are concerned that they

may be seen as “technically obsolescent” by the university and hence potentially redundant. As a result, there is a desire to cling to existing systems and to use what is known, even though its inferiority may be obvious. This in turn has an impact of documentation, with staff placing an emphasis on stability – in other words leaving the documentation as it is - rather than improvement.

## **8.2 The relationship between published documents and the reality perceived by informants**

As explained in Chapter 7, the attitude towards published procedures varies according to the background and responsibilities of staff. The key issue is the question of motive. In the case of academics, the most important thing is to get course proposals approved so that students can enrol and teaching commence, and this in turn means that this group as a general rule will accept numerous hardships and inconvenience to enable this to be achieved. Thus, while many may object to the bureaucratic nature of the process almost all are willing to tolerate its frustrations and meet its requirements, provided courses can commence on time. It seems unlikely from interview that the majority of academics appreciate the nuances of the system, or the checks and balances that have been built into each stage. Thus, the course approvals process is seen more as a nuisance – a review to be undergone or a hurdle to be jumped as a means to an end – rather than a vehicle for ensuring quality.

Administrators on the other hand appear to see the accreditation process in a slightly different manner. At its most basic, the accreditation process is a means for extracting information. The academic community may be fully aware of all that their colleagues plan to offer – it is the task of the administration to support this sharing of knowledge, and this can be done only through adequate information, with the accreditation process being seen as the means through which the data can be captured. Hence, fidelity to the accreditation process is regarded as the best way for ensuring standardization and stability, while at the same time enabling all to perform their duties and discharge their responsibilities. For this reason, the process itself may be seen as more important than what is actually undergoing processing.

University executives appear to view the accreditation process in a different way again. To university executives, the accreditation process is a means of protection, whereby the university protects itself (and hence its staff) from everything that could destroy confidence or harm its reputation. Thus, it is not the process itself that is important, but the fact that the process exists, that it is applied consistently across the institution, and that it is well known to stakeholders.

The catchword used by informants to capture this image appeared to centre around the word *quality*, although the meaning attached to the term varied greatly. It was plain that no academic would ever be willing to put their name to a proposal that was not of the highest *quality*, but what is meant by this appeared to refer to the suitability of the submission, the manner in which it would be taught, its value for students, and the contribution it might make to society. Every proposal that leaves a faculty is in as perfect a state as its developers can make it, and hence it is rarely a matter of seeking improvement through friendly advice – that has already been done within the faculty. What is required from the system, at least from an academic perspective, is the endorsement of a wider pool of colleagues, as persons beyond the immediate discipline who are best qualified to recognize its value, status, and academic merit, with accreditation itself being nothing more than the arena within which this occurs. It is the consent to the proposal rather than the process through which it occurs that is important. Academics will tolerate a great deal provided recognition is given by a panel of peers (similar in almost all respects to a peer reviewed publication). The process through which this is achieved should be seen simply as a means to this end. Quality is therefore seen as an endorsement by peer acceptance.

The concept of *quality* appears to be completely different as far as administrators are concerned. In this case quality means accountability, with the accreditation process being the means through which accountability is measured. Thus, it is not a matter of the content of each proposal, but rather the

manner and consistency with which each is addressed that is important. It is the ritual of the ceremony that counts, not because of any virtue in what is being done, but because it shows that all have addressed their responsibilities. Thus, *quality* in this case means a repetitive consistency rather than radical improvement as each proposal is processed.

In the case of institutional executives, quality would appear to mean dependability and reliability, and it is the system, rather than the progress of individual course proposals that is important. A sound accreditation procedure, with few interruptions and a minimum of disharmony, reflects a stable and well run institution, and provides an effective counter to disbelievers. Thus, there is little interest in the progress of individual proposals, but much greater emphasis on the homogeneity of the outcome.

There was no question of those directly involved with particular stages in the process being unaware of what is done by themselves and the value they add to the process. At the same time there would appear to be far less appreciation of the work of others, either academic or administrative. Thus, material arrives at a particular stage, is received, processed and passed on in accordance with procedure, but with little understanding of what it has already been done, or what will follow. Then as soon as one batch has been dealt with the next follows, each of which is handled as effectively as before, but with a sense of “academic Taylorism” (a term proposed by Manav & Erturk 2014) that blinds operators to the purpose of what they are doing. This in turn makes the stage with which staff are personally involved far more important in their own eyes than the process as a whole. It also makes it much easier to blame others.

There may be a number of reasons for this. Certainly, the issue of personal protection is important, as one is not blamed for the failings of others but would certainly be made to take responsibility for errors that occur on their watch or within their area of control. There is also a sense on non-interference in the work of others - particularly when these are people one rarely sees who work elsewhere on campus (a feature of the mega-university) - and a feeling that those working in other areas of speciality know more about a particular aspect of what should be done than those who do not. The end result, however, can well be a failure to detect mistakes made elsewhere (or if detected, not to report them, or worse, to try to remedy them with the tools under one’s personal control) and all of these impose weakness on the system. Senior staff (particularly academics) are as unaware of just what occurs elsewhere as their junior colleagues, with all relying on the *system* to keep things honest rather than the individuals within it. This trust in the system carries enormous potential for weakness.

It quickly became clear that it was rare for staff to grasp the intent of the institution (as distinct from the instructions to themselves) when course accreditation procedures were discussed. Most had read the published documents and could state quite clearly what others are expected to do, but few seemed aware of just what the university hoped to achieve. This in turn led each to place their own interpretation on events and to see things through their own eyes rather than those of the institution. This in turn caused frustration and confusion, with each blaming others for delay or obstruction. The level of knowledge of what occurs behind the scenes - particularly within the otherwise hidden units scattered around the university – was often cited as an area of concern by administrators although few could provide solutions.

The problem is that course accreditation appears to work effectively in weeding out defective course proposals in most universities, and for this reason failed to attract complaints about its operation (Informant 24). A number of other staff noted the inverse relationship existing in Higher Education between quality and complaints. If there were few complaints the outcome could be assumed to be of acceptable quality and vice versa. The measure of “quality” by the absence of complaints appears embedded in many institutions, a matter that comes to the fore in satisfaction surveys. As respondents noted, if there were numerous complaints about the accreditation process someone might feel obliged to do something about it. As there were few if any complaints – and these largely from aggrieved parties - there was little incentive to make changes

The general feeling in most universities was that the system in place in their institution does what was intended - and this is most certainly true, although few seemed conscious of the reasons why it works or aware of the issues that could derail it. The accreditation process delivers what universities expect it to deliver but because it operates quietly and without dissention little need is felt to make comparison with what occurs elsewhere, and there is often even less interest in finding out.

### 8.3 Broad overview of the findings

As stated in Chapter 1 there is a considerable difference between the course accreditation procedures of Australian universities. All are attempting to achieve a similar outcome, but the means through which this is done varies greatly from one institution to another. However, there is a common theme underlying all statements about course accreditation in Australian universities

Accreditation is a quality assurance process under which courses and units are evaluated to determine that certain standards are met. As such, accreditation is not the same as a decision to offer a course or unit but a necessary condition for such a decision.

Course and unit accreditation is granted based upon established criteria that support high standards in the educational offerings of the University.

The course and unit accreditation processes encourage and support sound curriculum design and planning, and the development and approval of sustainable course structures. *(Monash University 2017)*

Curriculum approval and self-accreditation processes are designed to meet institutional quality assurance requirements as expressed in the Higher Education Standards Framework, and to assist the University to respond in a timely manner to new opportunities that arise. *(James Cook University)*

The Murdoch University Curriculum Commission was established by the university in February 2012 with the following aims:

1. To strengthen Murdoch's reputation for high quality teaching and learning in all of its academic programs.....
2. To ensure that our majors and degrees meet national and international standards in terms of curriculum design, delivery and learning outcomes
3. To promote a stronger relation between teaching and research....
4. To ensure that our academic programs operate on a financially sustainable basis
5. To make these changes internally self-sustaining  
.....*(Murdoch University 2012)*

Similar statements have been made by other universities. The common theme is that Higher Education providers wish to offer viable programs that are educationally, politically, and financially effective, while at the same time delivering a service to the community. (Duke 2002). The way in which this is done varies greatly, however, as does the method of evaluation by the university and more recently by external regulators.

### 8.3.1 Oversight of procedures by management

One of the more significant question asked during the research was who – the person or office – was ultimately responsible for the effectiveness of the process. The answer given by most informants is the DVCA (Deputy Vice Chancellor Academic) or equivalent, as the agent of the Vice Chancellor and ultimately as the designated agent of the governing board. This is a less than adequate response, however, as while the DVCA may nominally be in charge of the process - and is reported to be so in the documents of certain universities - there would appear to have been few, if any, cases in which this person appears to have actively intervened in what others have done. Indeed, there would seem to have been few instances in which either the senior management or the governing board have questioned the recommendations of courses committees or the approval of academic boards unless there was a clear failure of due process. This suggests that either the system works perfectly in most universities and requires no supervision, or that there is some other group or entity that provides control behind the scenes. The problem is made more complex by the fact that different groups may well be seeking different things from the accreditation process, and as a result may be applying different standards of risk management.

It would appear from the documentation provided by most universities that course accreditation is intended to do five things, each of which has a separate locus within the institution. These things are:

- To regulate the portfolio of the institution. There are certain disciplines (or parts of disciplines) which a university may feel obliged to concentrate upon if it is to fulfil its mission, but these in turn are limited by finance and resources. To survive in a world with limited means while still achieving its mission a university must be selective, and this in turn means that it is unable to provide everything that clients might feel desirable.

One of the purposes of course accreditation is, therefore, to restrict the portfolio of the institution by filtering out those proposals that may inadequately support its mission, while at the same time concentrating attention and focusing resources on those that do. This is essentially the responsibility of the Faculty, and it is interesting that Australian universities will not normally consider proposals which have not passed through a faculty board, even if outsiders are prepared to fund them completely and they impose no burden on the institution. (While the word “Ramsey” was not mentioned during the research, almost certainly because the data was collected before the question of courses in European Civilisation rose to prominence, the reception given to the Ramsey Centre by the various universities such as the University of Wollongong provides an excellent example of this principle.)

- To ensure that the proposal will have the support of staff. This is the other role of the faculty in the course accreditation process. Informants discussed the numerous proposals that were *still born* in faculties, which the staff did not favour or which deans were unwilling to fund, the majority of which had become as though they had never been. Again, this is essentially a faculty matter that is resolved at that level, without revelation to the wider university.
- To avoid disputes and conflicts. There are few courses that can be offered without impact on someone within the institution. This may involve the loss of finance, space, equipment or students, it may increase the workload, or it may restrict the opportunities available to staff and graduates. One of the purposes of course accreditation is to give publicity to future

proposals as early as possible to enable those who feel themselves disadvantaged to submit their concerns to arbitration. For this reason, most universities make the content of courses that have been endorsed by faculty boards available to other staff as early as possible, although the point at which this is done and the means for doing so vary greatly from one university to another. (In some cases, the minutes of faculty boards are made available on the internal web, where they are available to staff but not to outsiders. In other cases, the office or unit responsible for the shepherding of the proposal through the system makes this information available to the university by electronic newsletter or other publicity). Irrespective of how this might be done, informants felt that this was a significant part of the accreditation process and that a failure to make this information available in a timely manner was a perennial source of difficulty that reflected badly on those responsible

- To ensure the financial, political, reputational and social viability of the proposal. As a general rule, most universities prefer that this be done after disputes have been resolved, as further resolution could affect these issues. Essentially the university wishes to assure itself that a proposal is financially viable, that it will enhance the political, reputational and social responsibilities of the institution and cause no dissension in the community. While the recommendations would normally be made to the Vice Chancellor (often via the Vice Chancellor's Advisory Committee or equivalent), the group that is ultimately responsible for assuming these risks is the institution's governing body, with the Vice Chancellor acting as their agent.
- To ensure that the outcome would be recognized by other institutions. While many assume that this is the sole function of course accreditation procedures it is, in fact, just one part of the sequence, and occurs last. While procedures vary according to the university - in some cases the major role is played by the courses accreditation committee, with academic board endorsing their recommendation without question. In others, the courses committee simply offers its views to academic board, leaving academic board free to determine whether it will accept them or not - it is academic board that takes responsibility for this aspect, acting under delegation from the University Council.

Thus, there are several groups that are responsible for various aspects of course accreditation - a situation with the potential for conflict, even though all are nominally within the sphere of control of the institution's governing body. Conflict is avoided, however, because the process is sequential. If a proposal fails to satisfy a faculty board it goes no further and is of no interest - and often remains completely unknown - to subsequent committees. (A body such as Academic Board rarely questions a faculty about why it might reject a course proposal, largely because it knows nothing about it.) Each group operates independently but is empowered only to make decisions on the material submitted to it. For this reason, there is little cause for senior management to intervene provided there are no complaints. In the vast majority of cases, oversight of the course accreditation process is left solely to occasional review by internal audit, while the outcome is of interest to academic board or the governing council only if something has gone wrong.

The answer to the question of "Who is ultimately responsible for the oversight of course accreditation in this particular institution?" is therefore (and, perhaps surprisingly) no-one. There are groups that are responsible for various stages of the process, and these can be blamed if something goes amiss on their watch, but in the vast majority of Australian universities there is no one who is actually (as opposed to nominally or formally) responsible for the process as a whole from beginning to end.

### **8.3.2 Oversight by Academic Board**

The conclusion reached in the previous paragraph was contested by a number of informants, many of whom suggested that the course accreditation process was under the control of Academic Board, and

even pointed out paragraphs from the procedural documentation that said that this was so. At the same time, the role of Academic Board for both the process and the outcome was clearly limited. Academic Board has little control over finance and has even less control over the individual faculties. While both Academic Board and the faculty Deans normally report to the same master (often the Deputy Vice Chancellor Academic - DVCA) most informants suggested that these people rarely interfered with daily operations and often remained passive until a problem emerged.

Other informants (once this anomaly was pointed out) suggested that oversight of the accreditation process was the responsibility of the Chair of Academic Board or alternatively, of someone within the administration. Neither response was very convincing. The Chairs of Academic Boards are often not particularly senior people, or even when selected on the basis of age and experience as a precursor to retirement are not in a position to drive the internal workings of their university. Thus, the Chair may well be able to influence an errant chair of the courses committee, but their power beyond that is extremely limited. (A number of informants pointed out that the Chairs of Academic Board rarely assembled the agenda for the meetings of that body. This was done for them by those supporting the committee, with the Chair – or their counterpart, the Executive Committee of Academic Board – simply empowered to accept or decline the draft presented.)

Other informants suggested that oversight of the accreditation process was ultimately the responsibility of the administration, possibly by default as this was the group most likely to be held accountable if something goes wrong.

I don't know who is responsible for course accreditation in this university –  
I only know who will be blamed if something goes wrong. [Informant 12]]

Despite this, the powers of the administration are not particularly strong. The administration may establish procedure but then have little control over what happens subsequently. Administrators can delay the process if they choose and they may be able to cause further disruption by pointing out errors in text or action and refusing to process documents, but otherwise they have little control over what others might do.

Most universities have a regular cyclic review of Academic Board and its committees, and course accreditation usually falls beneath this umbrella. At the same time these reviews, whether done by an internal auditor or an external panel, rarely have time for minutiae, and if there are no complaints on course accreditation - or at least that part of the process that is under the control of Academic Board – it tends to pass unnoticed. (The terms of reference of review committees prevent comment on the work of other groups, such as Vice Chancellor's Advisory Committees, and it is often assumed that because review committees have made no mention on something, everything is going well - it may not be (Waduge 2011).

It would seem from the comments of informants that Academic Boards are rarely interested in the administrative or technical issues associated with accreditation, although these may be believed by the Board (if no one else) to fall within the brief of course assessment sub-committees. Most informants suggested that Academic Boards are generally far more interested in outcomes than how those outcomes are achieved. Thus, when recommendations are made and accepted, Academic Boards are rarely concerned about how these might have been achieved. As a general rule, Boards trust their committees, and this may be another source of weakness (Waduge 2011).

### 8.3.3 Influence of accreditation practice on institutional curricula

Accreditation procedure has a surprising effect on institutional curricula. If something cannot be accommodated within the structure of the accreditation process, or cannot be recorded on the student record system, then in this mechanistic age it simply cannot be offered, no matter how desirable.

The following examples were given by informants:

- Modules as parts of subjects. There have been a number of cases where staff have suggested the use of modules as components of a subject. These modules would be taken at a time of the student's choosing, and if sufficient were successfully completed, the student would be credited with the subject. The difficulty is that the vast majority of student record systems are unable to deal with units smaller than complete subjects, and that it is equally impossible to charge partial HECS. [HECS is based on whole subjects – a directive of the Commonwealth - and there is no way in which a charge can be made on anything smaller]
- Independent experience subjects – An independent experience subject involves the student undertaking some (approved) task on their own and claiming credit for the work done on completion. This could include overseas travel, private mastery of a skill, the completion of a reading program, a course at TAFE, and so on. Unlike a work experience or field placement subject there is no oversight provided by the university, with the student simply completing what has been agreed upon and providing a certificate to that effect to claim credit. There is no formal assessment and the results are recorded as simply pass/fail without grades. The work agreed upon may be of variable length and could in fact take longer than two semesters or extend for the life of the course (as in certain Music awards requiring instrumental study). Students cannot be enrolled in these subjects (other than by subterfuge to ensure the maintenance of a full-time load), they attract no HECS, and the most that can be done by the university is to grant credit after the task has been completed.

The vast majority of student record systems are unable to cope with subjects – even those controlled by the University - that are longer than two semesters (and even in this case it is usually necessary to break year-long subjects into two single semester units to fit it onto the system). A subject of indeterminate length, in which the student perseveres until completed, simply cannot be accommodated. One university worked around this issue by awarding credit for completed tasks as the course proceeds, using as precedent the Recognition of Prior Learning (RPL) – a strategy attractive to international students as credit gained under these circumstances carries no fees). At the same time these subjects do not contribute to the student's load (and visa requirements) either and may cause other ramifications for those claimed to be enrolled full time.

- Subjects assessed elsewhere – Course accreditation committees are reluctant to approve subjects assessed by someone other than the university itself, even though the provider may be completely legitimate and the standard of assessment beyond question (such as the exams conducted by Trinity College of Music London). The difficulty is that these subjects of this type cannot be entered onto the student record system as part of a student's normal enrolment and have to be regarded as external subjects for which credit is given as electives, and hence fall within the university's restriction on the total number of electives that can be taken in a program. The situation is made even more difficult where it is the university itself that is providing the teaching, and where the staff teaching the program are undertaking the assessment as well, but acting as agents for a more prestigious partner, not their immediate employer (as in the case of courses leading to an award from the University of London). For this reason, most universities – while they appreciate the benefit offered to the graduate - are reluctant to accept these subjects of this type as parts of courses.

- Whole course subjects – Whole course subjects are those where the course itself is regarded as a single subject (administratively a PhD is regarded as a “whole course subject” as the total workload must be successfully completed or no award will be conferred – there are many similar examples). There may be sound reasons for programs of this type – based frequently on the requirements for professional registration or acceptance by the community – but such enrolments create enormous difficulties for student record systems and, as such, the majority of course approval committees are reluctant to approve them.

It might be asked why universities, when faced with issues such as these, are unwilling to make changes to their system to accommodate these variants. The answer lies in the cost (*advised by an administrative informant*) as it is very expensive to make changes to a student record system, particularly when only a small number of students are involved, added to which is the loss of efficiency when programs have to be treated differently from standard courses. Course approval committees are unable to endorse something that cannot be placed on the system, and as such these innovations, while educationally desirable, must be ignored (*advised by the chair of a course committee*).

### 8.3.4 Other influences on the accreditation process

As mentioned in Chapter 7, informants suggested that there were five other factors that impacted on course accreditation procedures, particularly at an accreditation committee level:

- The first was time - there was simply not the time to review everything in the same detail if deadlines were to be met. The pressure of time lead to a number of short cuts that had apparently not been envisaged when procedural documentation had been prepared, which while necessary weakened the system. These included giving greater weight (and hence more time for reading and discussion) to more questionable, more novel or more controversial proposals at the expense of those felt safer and hence needing less closer reading. Alternatively, certain members of the accreditation committee might be asked to concentrate on specific proposals and report their findings to the meeting, or as a variation on this, members might be asked to concentrate on particular aspects of documents (such as the course structure) with others assuming that if these were satisfactory the remainder would be also. Most informants suggested that time was their greatest worry, particularly if other activities had to be sacrificed to make this available, and that the absence of time was one of the most critical influences on the accreditation process.
- Corresponding to the absence of time was the absence of staff. There were certain staff who were deemed essential for a balanced review of course proposals, particularly groups from the administration, the international office and the indigenous unit. If the normal members were away, it was possible for these groups to send substitutes but these were generally less informed, more inexperienced or new to the work of the committee, and either kept silent throughout meetings or raised points for the sake of being heard rather than because they were of vital importance. While this rarely led to a departure from established protocols, the absence of key members caused disruption and hence prevented the smooth functioning of the group.
- A more serious cause of departure from established principles lay in pressure from senior managers to have programs approved despite the quality of documentation or the paucity of information. This was particularly the case where the approval of a course was required for strategic planning purposes or to address the requirements of a pressure group within the university. The majority of informants said that their senior management preferred to avoid being seen as influencing the accreditation process in any way and regarded executive intervention - something completely legal but which made a complete mockery of the approvals process - as a last resort, to be used only when everything else had failed. For this

reason, there could be enormous pressure placed on accreditation committees to approve something that might otherwise be doubtful for the sake of legitimacy.

- One major factor affecting the smooth operation of published procedures - at least as seen by academics - was the risk of administrative delay. Administrators, when challenged on this, claimed that any delay – which they refused to acknowledge – was more likely due to the pressure of tasks with a higher priority, many of which would have been unknown to their academic colleagues. Despite this, most administrative units work with a minimum of staff and there can be unavoidable delay through illness, leave or relieving in higher duties. As a general rule, most administrative tasks were completed on time, with proposals going forward as scheduled, but often at the last minute with little notice to staff. In turn, this gave scant time for the review of papers or the correction of errors that could be fatal to a program's approval. For this reason, it would seem that the many academics unconsciously factor a period of delay into their course approvals timeline and are sometimes embarrassed when this catches them unawares. The sense of needing to second guess and counter administrative delay - which administrators claimed was seldom required - can cause uncertainty, and this in turn can easily disrupt published procedures.
- One further consequence of the pressure of business - where, put simply, the number of proposals temporarily exceeds the capacity of the system - was the need to take steps in anticipation. It would seem that in most of the published procedures a lock-step arrangement is envisaged, with each succeeding the other - rather than doing particular tasks in anticipation. This working by the book is often impractical to pressured staff in a time stressed university. Thus, preparatory things are done (such as giving lists of books to the bookshop or negotiating clinical places) well in advance of approval. This does not matter - and is, in fact, to the advantage of everyone - if the proposal is approved, but if it is not, it can cause great embarrassment, not simply to the course developer, but to the university as a whole because outsiders are involved. There is, therefore, great pressure on committees to approve proposals of this type to keep faith with the outside world, even if this means a complete resubmission of documents later.

It would be wrong to assume that these things are always the case. They are little more than the exceptions that challenge the rule, but at the same time they constitute the pin pricks that can rupture the balloon of invulnerability implied by procedural documents, and each of course presents its own risks.

## **8.4 Risk Management in Course Accreditation**

From the comments of informants, risk management varies according to the stage a proposal has reached in the course accreditation process. Risk appears to be taken seriously and consciously by Deans when proposals are signed off by faculty boards, and equally seriously (although perhaps more narrowly with greater emphasis on financial and strategic risk) by Vice Chancellors Advisory Committees when the initial concept is approved.

Risk management appears to move out of sight as proposals pass down the system. At first it was thought that this might be due to the fact that subsequent committees felt that the issue had been addressed adequately at an earlier stage and did not require further attention. Informants suggested that this was a less likely explanation, and that most of the subsequent committees did not look for risk because they had not been trained to do so. The system, however, took this into account by including certain items that committees must address (such as the effect of a proposal on the reputation of the institution) and thus forced risk management upon these bodies without their realisation that it was doing so.

Despite this, the nature of the risk was different. At the earlier stages of course proposals, most of the risk is visible, obvious and internal. Thus “Will the course be financially viable?” “Can we staff it?” or “What effect is this likely to have on our existing programs?” As the proposal moves down the line, the risks faced become more nebulous and involve issues such as “Is the course of a similar standard to those offered by others?”, “Is there a danger of premature obsolescence?” or “What will be the effect on our reputation?” In essence these issues involve external factors over which the university has little control, whereas the earlier risks involved matters that could be addressed in advance by the institution.

It would seem that all aspects of course accreditation are not without some consideration of risk - the key fact is that staff appeared to be applying the principles of risk management because of the system under which they were working, without necessarily being conscious that they are doing so.

#### **8.4.1 What are the risks that universities face?**

The greatest risk faced by a university appears to involve irreparable harm to reputation, followed in the Australian context by loss of confidence by the Commonwealth Government and the effect this may have on numbers and funding. Other risks involve a change in government policy, the collapse of the overseas student market, and the danger of obsolescence through technological change. A further risk faced by administrators (but not apparently by academics) was the danger of outsourcing, particularly at a time of an increasing standardization of procedures, improved communication, the casualization of staff, and changes in the administrative process (it is far cheaper to have statistical reports prepared in China or India for example than it is in Australia). While the latter were risks faced by staff rather than the institution, the ultimate effect was a decline in morale – an issue with consequences for the university as a whole - with a failure by staff to remain proactive in support of their employer (and ultimately of their students) (Weikliem & Frenkel 2006).

#### **8.4.2 How are these risks addressed?**

One of the key points to emerge from this research appeared to be the feeling of helplessness expressed by staff. Staff were aware of the risks faced by the institution (and hence themselves) but felt powerless to do anything about it, possibly because the dangers they feared were unable to be resolved on an individual basis. Informants were keen to explain how the university might avoid risk (even though few institutions appeared to have been taken steps to do so) but were unable to explain how they themselves could address the situation in the face of a declining economy, increased competition and obsolescent skills.

Things have changed and I don't like it here as much as I did when I started, but where can I go except to another university, and things are probably worse there than they are here. [Informant 31]

The standard answer to the question of how risks are addressed is that universities handle those risks that are within their control by prudent management, and those risks that are beyond their control through contingency planning, but this is hardly the complete story. There are five areas in which higher education providers are extremely competent, and these (while not encouraged by any textbook available to the researcher) are used extensively by Australian universities to manage risk

- Universities are highly skilled in lobbying politicians, exercising a control over the political system by threats and promises in a way that is simply impossible in most overseas systems. Australian universities are seen as a creation of the government. If something goes wrong, it is the government that is blamed as well as – or perhaps even more than - the institution itself. Informants noted that the Australian public continues to confuse the responsibility of governments for universities with a similar responsibility for the management of high schools or TAFE colleges, hence, the government cannot afford to allow its universities to fail (perhaps the whole point of TEQSA) and will take inordinate steps to prevent this occurring. Australian universities have long known that risk can be much reduced by lobbying the government (Informant 35)
- Australian universities take pains to remain on side with the media, either through announcements of research or the achievement of students and use this to create a favourable impression in the eyes of the public. Thus, many areas of risk can be mitigated, even if not avoided, through gaining public support and sympathy.
- Australian universities are anxious to present themselves as integrated units, without failings themselves, but sometimes with disobedient staff. If something favourable occurs – let’s say a staff member wins a Nobel Prize - the university itself takes the credit, almost as though it was the university that was responsible for the honour not the scholar. If the university is portrayed unfavourably, however, the fault lies in the faculty, the department or an individual lecturer, never in the university as a whole. This strategy of blaming shifting – particularly if the blame can be directed to a rogue scholar, external to (or acting independently from) the university - has long been an effective way to manage risk (Evans 2016)
- Most universities retain external public relations consultants, sometimes at arm’s length although the role of these people is slightly different from their counterparts in industry. In universities, public relations contractors act as event managers for the future, shaping public perception of the things that are yet to come, downplaying faults and glorifying achievements. There is more to it than this, however. By creating a favourable image, public relations specialists can shape public opinion and mould it to a form that minimizes risk (Slaughter & Leslie 1997). Thus, a university may have a need to change but choose not to, possibly due to the straitjacket of culture, tradition, alumni, or staff intransience. Effective public relations can turn this from a vice to a virtue by stressing the history and stability of the institution (Coates 2017). While some may call this “spin-doctoring” it remains a valuable means for diverting attention, and thus avoiding risk (Roussel 2003)
- There is one additional strategy available to Australian universities. If universities can be made to appear as though they are simply obedient to their superiors (in this case the government), with little will of their own, it is much easier to present the institution in the image of an absent minded professor, kind hearted and skilled no doubt in his learning, but sometimes blundering carelessly from place to place – a person to be pitied for his unworldliness rather than condemned for incompetence. For this reason, the sector often portrays itself as a wandering dreamer that is dependent on outsiders for its welfare and guidance. Thus, if a fault arises the blame must rest with those who failed to provide support or oversight not the university (Macintyre 2010). This in turn moves as much responsibility for risk as possible away from the university. (Lacy, Croucher, Brett & Mueller 2016).

It might be asked how each these points relates to course accreditation. Informants suggested that all could be used as excuses if the unforeseen occurs after programs are approved (Informant 31). It would seem that universities may not be held to the same expectations as other public bodies, and that if things go wrong their mistakes can be more easily forgiven and their errors forgotten (Watson et al. 2011).

### **8.4.3 Concerns raised by particular groups or individuals (not included above)**

One issue raised consistently by informants (both academic and administrative, but particularly administrative) was the possibility of further contraction in the sector, with the loss of jobs through outsourcing and consolidation.

There were two causes for this fear – the overdependence of Australian universities on the international student market and the entry of offshore providers, both of which could cause sudden instability and financial loss. It was suggested that this in turn might well lead to further consolidation and that number of institutions may be deliberately keeping their accreditation (and all other internal) procedures separate from others to maintain their distinctiveness and thus avoid absorption by the sector. Thus while consolidation might appear attractive to outsiders (provided no campuses are closed, those beyond the university seem little concerned about who runs or administers their local campus), the incompatibility of systems – of which course accreditation is only one - may be part of a deliberate strategy by Australian universities to make consolidation too complex or expensive to achieve.

There was a further issue. It was noted by a number of informants that external groups - particularly professional registration bodies - were becoming more demanding in their expectation of what universities should be teaching. In the past, a university designed a curriculum and submitted it to these external authorities for acceptance. The proposal originated with the university, not the professional body, and it was the university that took the initiative. What was occurring increasingly was the design (or quasi-design) of a program acceptable to the professional body in the first instance that the university was then encouraged to approve, service and deliver. (The situation was made even more difficult when some of the advisors to these professional bodies were also on the staff of the university. These people would design the course and then use the authority of the professional body to push it through - a matter that undercut the autonomy of the faculty as well as the university and could well result in a transfer of resources from other programs. This was particularly the case in rapidly changing disciplines such as Computing and Engineering where a considerable investment was required for labs and equipment, but which would need to be funded by the institution rather than the professional body.)

One final problem was the lack of training given to course assessors in Australian universities. It would appear from the comments of informants, that no Australian universities provide an induction to the science of course approval apart perhaps from a brief introduction (where necessary) to the rules governing university committees. It would seem that virtually all Australian higher education providers assume that those who become members of course accreditation panels are already competent in their trade and that no further instruction is required. Informants suggested that this was a fallacy that could lead to the blind leading the blind, and that it was only the innate conservatism of university committees that prevented disaster.

Informants suggested that the lack of experience and expertise was most apparent when there were student representatives on courses committees. The role of these people was indeterminate, their qualifications for appointment (or election) uncertain and their contribution extremely limited. It was also noted that in many cases, student representatives, once appointed to these bodies, were conspicuous by their absence from meetings, but were rarely missed. It was noted that an increasing number of universities had eliminated students from their committees, although informants suggested that this was not really the fault of the students, but more that of the institution, which provided little guidance or support.

### **8.4.4 Other risks identified during the research**

Other risks included:

- Conflict between academics and administrators - Conflict between academics and administrators appeared rare but not unknown in course approval. There was always the possibility of frustration (either through incomplete documents, the priority of work or the more general charge of bureaucracy and unnecessary delay) but this was essentially transient and confined to individuals, never to groups. In all cases - informants recognized no exceptions - both academics and administrators worked harmoniously throughout the course approvals process, with each respecting the role of the other, and the question of conflict, while present, rarely arose.
- The cost of course accreditation to the institution – This was a major issue. Informants agreed that course accreditation was expensive, particularly if one took into account the foregone costs of staff and the disruption caused by the preparation of documents, the time of meetings and the administrative follow up. At the same time, it would appear that no Australian university - or at least none from those of the informants who were interviewed - had done any real costing of the process, and the expense of course accreditation was completely unknown. A number of administrators identified this as a source of weakness as unless the cost of an activity is known it is impossible for a university to determine whether it is receiving value for its money.
- The effect of feedback to the faculty - Most respondents felt that course accreditation should be seen as a one way process, with each proposal being treated on its merits and that any feedback to the faculty beyond amendments to the document on hand was unnecessary. Thus, there was no attempt to encourage the faculty to learn from the experience, and any learning gained was incidental. Few respondents saw the accreditation process as a vehicle for institutional learning, and fewer still thought that the current interaction between staff groups would lead to improvement. Most participants in the process were anxious to get the job done - for the proposal to be either endorsed or sent back - rather than to spend time in learning from the process.
- The learning experience of those immediately involved - Almost all participants in the accreditation process viewed what they were doing as an operation - a task performed as part of their official duties - not as a learning experience. There was no question that expertise could be gained over time, but this was practice by repetition, rather than learning by conscious effort. Many respondents wondered, in fact, just what could be learnt from what they were doing. There was no question that the more that was done the greater the efficiency became, but there was no suggestion that the skills gained in doing so could be transferred to other spheres.

While a number of academics said that their experience in having courses approved had made them more conscious of the requirements of the system, and that if they were doing it again they might approach things differently, virtually none said that the preparation of course material had made them a better scholar, teacher or researcher. As far as administrators were concerned, respondents said they were simply doing their work. Proposals came, they were processed, and the worker moved to the next one. The idea that someone could learn from the experience - other than perhaps to do the job faster or more effectively, with fewer delays or mistakes - seemed strange if not abnormal.

- The benefit to students – Few, if any, informants saw the course accreditation process as being of particular benefit to students. Course accreditation was seen as a means for the university to satisfy itself that a proposal was compatible with programs elsewhere, that it was viable, and that it would lead to a range of desired outcomes. It was not seen as something that would directly benefit students, even if the courses approved might. It was perhaps for this reason that students were not seen as a focus of the process - they might be the end users

of the product, but this was not the point involved - nor was the teachability of a proposal regularly canvassed or considered from a student's point of view. ("Teachability" from a staff perspective formed a normal part of the accreditation process. The reception of this material by students was not – provided the boredom of lectures failed to drive them away)

- The process between approval and delivery - Unless directly involved, few informants were clear on what happened between the approval of a course and the arrival of students for the first lecture. There was almost an assumption that things followed so automatically that no insight was required. The researcher noted that most course approval procedural documents end at the point of approval and was anxious to determine what followed this stage, and how the university prepared itself for the influx of students.

While those directly involved with the process were clear on what happened (and were more than willing to explain the entry of data, the advising of the institution's marketing division, the need for room allocation, timetabling and other resources), few of those less immediately affected were able to throw much light on what happened, and in fact gave the impression that this was considered someone else's business with which they were not involved. Academics, for their part, addressed the question of course outlines and the preparation of lectures, together with complaints about the tardiness of the printery or the administration, often deploring the late arrival of class lists but seemed completely unaware how these things were generated.

This provided further confirmation that few in a university were willing (or had the opportunity) to follow the process from beginning to end, with a further risk that the contribution of the individual would be seen as more important than the quality of the process as a whole.

- The risks involved in the process – The key point of the research was to learn how risk management affected course accreditation in Australian universities. It was unfortunate that so few respondents could provide a direct answer. There were none who were unable to explain their role in the process and to describe in minute detail all that they did, but only a small number were able to integrate this with the wider issue of risk avoidance or mitigation. When challenged on this point, the dangers expressed were those that were the most obvious – missing papers, a loss of data through IT failure, an inability to get documents ready on time, and so on – but few looked beyond this at the greater risks faced by the university or how their employer planned to avoid them. Put simply, these were someone else's concern and (unless at a senior level) not their business. The risks faced by universities were collated from the collage of information provided by informants, but rarely from a single individual.

The basic problem would seem to be the ritualisation of course approval in many institutions. The majority of universities seem to assume that their staff will recognize a defective course if they see one and hence provide no training in how to do so. These same institutions provide even less insight into risk management, other than the obvious dangers to health and safety inherent in the industry. Fortunately, risk is avoided through the rubrics of the ritual, not because those practising these rites are consciously aware of it, but simply because a fidelity to requirements acts as a guard rail to prevent errant drivers from going astray.

#### **8.4.5 Contingency planning and risk avoidance**

There would appear to be a strict demarcation between "planning" and "delivery operations" in Australian universities, with those engaged in one of these activities having little to do with those involved with the other. Risk management - apart from the obvious, such as workplace health and safety, the dangers of the laboratory, or financial misappropriation - is seen as a responsibility of

planners, not other staff, and it would seem that the majority of university employees are more than content to leave things this way.

The difficulty, however, is that the current position seems to be entrenched, and would now be difficult to change. The situation has not been helped by the appointment of Directors of Risk (sometimes known by alternative names) who tend to be specialists in particular areas but not in risk as a whole. This in turn means that responsibility for risk often falls on those who may have vast experience but at the same time have received little training in risk management. This means that much of the strategy they apply is based in trial and error rather than a substantive knowledge of risk theory or avoidance.

One major problem noted by university planners was an unwillingness by those responsible for risk – essentially the executive of the institution - to look sufficiently far into the future, with a tendency to concentrate on current issues rather than those that may emerge once programs are up and running.

One of the major problems here is that decision makers won't or can't look into the future. Their vision ends at the start of next year and they are trying to fight tomorrow's battles with the weapons of today (*Informant 34*)

A number of managers suggested the opposite, claiming that the majority of institutional planners were dreamers rather than realists, and that the real issues were those likely to occur immediately rather than anything that might happen in years to come. There was also the more pressing factor that immediate risks were more likely to occur during the time that the present incumbents held office rather than emerging long after they had retired.

These fellows [*planners*] can say what they like but their crystal ball is too clouded to tell you much. I know what the problems are likely to be tomorrow, and these are the ones I need to get a grip on (*Informant 12*)

The conflict between planners and implementers becomes acute in course accreditation. Informants suggested that university planners tend to focus on long term aims and strategic problems, while those responsible for making recommendations to academic board concentrated on operational issues that are likely to emerge immediately, such as the availability of staff or the relevance of the curriculum. For this reason, the issue of whether the university would receive an adequate return on investment was missed entirely. Planners, on the other hand, condemned their colleagues for lack of vision

The difficulty dividing the two is that most of these feelings are never expressed in words. Planners hedge themselves behind words such as *might*, *could*, *possibly* or *potentially* lest they be shown to be wrong. Thus, their comments are made to meetings, and may well be influential, but the words spoken (complete with these limitations) rarely appear in the Minutes. Operational staff, on the other hand, can rarely afford to express their concerns – most of which involve the failings of other people - lest they offend someone more powerful. Thus, proposals are endorsed with reservation, not because of the issues stated in the minutes but because it would be impolitic to give more precise reasons (Pfeffer & Salancik 1974).

As a general rule, *risk identification* was not felt to be a high priority of course accreditation committees. It was felt that the risks, if any, should have been identified at earlier stages, and if a proposal was considered too risk prone it should have been deleted already. For this reason,

accreditation committees rarely go looking for risks. What they are most anxious to do, however, is to ensure that known risks – essentially the risks identified by others - can be managed. This may include a recommendation for a shorter period of approval, an earlier review than is normally scheduled, a restricted enrolment, or an insistence that a particular program be offered at a specific campus (often where specialised facilities, resources, staff, equipment or clinical places are available) and nowhere else.

Course Accreditation Committees are rarely responsible for contingency planning. Their life (or the time that existing members will remain on the committee) is too short and they have neither the time nor to wish to impose their fears on others, particularly when this falls outside their terms of reference. Contingency planning - the work needed to address risks should they arise - is something that must be left to more stable groups, such as the faculties, or if more strategic, to the institutional planning unit and senior management. The most that can be done is to alert Academic Board to the need for a shorter than standard approval period, and to offer guidance to a future review committee on the issues that may need to be considered. Nothing more can be done.

Three points were made consistently by informants:

- A responsibility for risk management is rarely found in the terms of reference of course accreditation committees (apart from the more general requirement “to advise academic board of areas of concern” - a statement sufficiently broad to be meaningless)
- When accreditation committees consider risk, they often do so inadvertently rather than deliberately
- When risk is considered, it is almost always short term and operational in nature. Strategic or wider risk falls outside the brief of most committees and is never mentioned.

It would appear that risk management is not considered a standard responsibility of course accreditation committees, and that risk is brought forward only if it is obvious, and if it is possible to do something about it. If little can be done, most panels prefer to say nothing and make no commitment. The situation is not helped by the fact that planning groups, strategic managers and risk management staff are generally kept separate from the course accreditation process and while providing copious advice to management rarely give feedback to academic boards.

#### **8.4.6 Risk appetite in Australian universities**

Risk appetite reflects the willingness of an individual or group to expose themselves to risk to gain specific objectives (Institute of Risk Management 2017).

Six things are important: (Taken with expansion from McCaffery 2013)

- The risk must be known (or at least strongly suspected). Risk appetite does not apply to completely unknown, unpredictable or unforeseeable risks except in the most general terms.
- The risk is accepted voluntarily, with the person or organization having the option to opt out and find another way if unprepared to take a particular risk.
- Risk appetite involves consideration of the complete portfolio of risk carried by a group or organization at any one time and involves the total exposure the institution feels to risk, rather than simply the number of risks on their books (if indeed the number of risks can be counted). As a purely mental concept, the total exposure is internally determined and will vary according to the circumstances, the confidence of the organization, the perception of loss, and the mood of decision makers. As such, is always in a state of flux.

- Risk appetite operates at several levels within a person or an organization. At the highest level it is a completely conscious activity. At another level, risk appetite becomes a semi-conscious feeling. At a deeper level again, risk appetite can be completely unconscious, as in the case of persons who have taken risks so often that risk taking becomes habitual (Breakwell 2014).
- These levels of risk become particularly important where stewardship (the taking of risk on behalf of others) is important, as is inevitably the case in Higher Education. A person may be prepared to take greater risk when only they are likely to be involved in the consequences than when their actions may impact on others (Tobenkin 2017). [*He that hath wife and children hath given hostages to fortune; for they are impediments to great enterprises, either of virtue or mischief. – Francis Bacon 1612*]
- Risk appetite - like hunger appetite - can be satiated. A person or an organization may decide (often for no obvious reason) that they have been prepared to take excessive risk on too many occasions, and that they should stop while they remain on the positive side of the ledger. This is often associated with age, maturity, or the possession of benefits gained through risk, although none of these in themselves give any assurance that future risk will be reduced (Chapman 2011).

Something similar occurs quite frequently in a university. A young institution (or a new staff member) may be prepared to take risks, and thus display a risk appetite that would horrify an older counterpart. There comes a time, however, when even the new university or the now maturing staff member decides that enough is enough. Its (or their) reputation has been established, enrolments are stable, the staff are effective, and their personal or institutional status is established. As a result, the risks that were necessary in the past are no longer required (Hersh & Merrow 2015).

This sometimes causes a disconnect between the risk appetite inherent in course accreditation procedural documents and what is expected in practice. The risk appetite contained in documents normally reflects the impression that the university wished to create when the material was originally written, and it was suggested by informants that this was often impractically ideal. This was particularly the case with the post-1980 universities, that, when first formed, wished to give an impression of quality, efficiency and rigorous checking, virtually as a means for legitimising themselves in comparison to the looser practices of their older counterparts. In reality, much less was done than was specified in the procedure, basically through a shortage of time and commitment. This era has long passed, although it was not until the course accreditation documentation of Australian universities was revised under pressure from TEQSA that the last of this material was brought up to date. A number of the pre-2016 procedural documents (most of which are still available through the Take Me Back archive - <https://archive.org/> - even if not available from current university websites) showed major anomalies between what was said and what was done.

Risk appetite is rarely stable in Australian universities, although the risks to which it applies are more generally found in research and commercial activities rather than teaching and delivery where there is greater stability and better predictability (Pardo 2015).

TEQSA on the other hand places considerable emphasis on risk appetite in three areas that go beyond this and which are inherent in course accreditation – risk to students, risk to institutional finances and reputational risks to the sector (TEQSA 2016).

TEQSA would appear to have a much lower risk appetite than a number of the universities committed to its care. The NSW Audit Office, while legally responsible only for institutions in NSW (for historic reasons, Australian universities are subject to State rather than Commonwealth legislation) has developed a Risk Management Maturity Toolkit (Audit Office of NSW 2015) as a guide to risk management and appetite (a copy is provided on the following page) This toolkit has since been adopted by the majority of universities across Australia (Informant 34).

#### 8.4.7 Risk Maturity in Australian Universities

Risk maturity is closely linked to risk appetite and deals with the maturity of a person or organization in addressing the risks they have accumulated. Not all risks are the same, not all consequences are as serious, and not all risks are likely to come to fruition at the same time. Risk maturity is essentially a measure of the ability of the risk taker to *prioritise risk*, dealing with the most urgent (the most serious or the most likely) first, and then with those that remain on order of importance. Risk appetite is the measure of the amount of risk that an organization is prepared to carry. Risk maturity is a measure of its ability to discern the precedence of these risks within its portfolio.

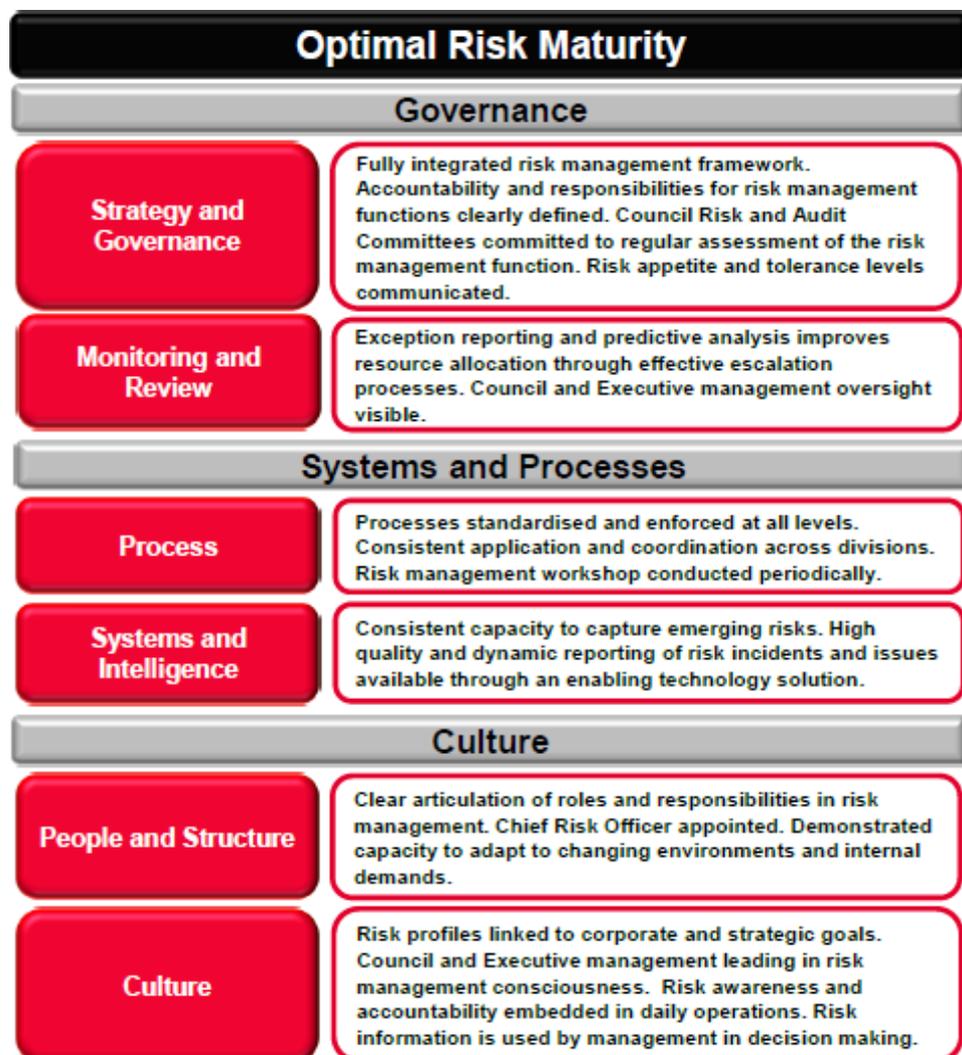


Figure 8.1 Optimal Risk Maturity

The Audit Office of NSW required the following from NSW universities no later than 1<sup>st</sup> January 2017.

In the university with the most mature risk management framework, risk awareness is evident at each business level. Executive management uses a top-down approach to communicate strategic risks and risk owners at operational levels conduct risk management workshops to identify key risks and escalate issues to management.

The university with the least mature framework for risk management is yet to embed a risk aware culture, where risk management is integral to the daily operations of the university. Current risk management processes are not consistently applied across faculties and business units (Audit Office of NSW 2015).

The NSW Audit Office has provided the chart shown in Figure 8.2 as a guide to universities:

# Appendix Three – Risk Management Maturity Assessment Tool

Assessment Criteria	Strategy and governance	Monitoring and Review	Process	Systems & Intelligence	People and structure	Culture	
<b>Fully Addressed</b>	<p>Leading edge, aligned risk management and mitigation strategies in place. Fully integrated risk management framework. Accountability and responsibilities for risk management functions clearly defined. Council Risk and Audit Committees committed to regular assessment of the risk management system and its operations. Risk appetite and tolerance levels communicated.</p> <p>Strategic and risk management plans and policies drive actions in all levels of the organisation. There is organisation buy-in of risk management procedures.</p>	<p>Aligned strategic methodologies that emphasise continuous improvement exist. External best practice benchmarking is conducted routinely. Advanced incident tracking and control systems across the organisation exists from Council/Audit committees to risk management and line management. Council and executive management oversight and monitoring viable.</p> <p>Targeted and specialised programs focusing on elimination of root causes of loss/risk incident implemented. Exception reporting and predictive analysis improves resource allocation.</p>	<p>Loss prevention and risk management processes are standardised and integrated organisation-wide. Proactive audit and program compliance enforcement exists. Employees/associates participation and knowledge of risk control parameters is advanced. Risk management processes and Best Practices achieved for risk management.</p> <p>Risk management processes standardised and enforced at all levels. Improved coordination across divisions. Risk management practices deliverables sustained. Risk management workshop conducted periodically.</p>	<p>Highly automated reliable information sharing capability organisation-wide enabling quick response, remediation and mitigation of risk incidents/issues. Use of sophisticated tools and data collection to quantify risks.</p> <p>Consistent capacity to track key milestones and compliance. High quality reporting of risk incidents and issues available through enabling technology solutions. Improved controls and compliance reporting available for resource deployment and decision making.</p>	<p>Organisation demonstrates the capacity to adapt to changing environments and internal demands, continuously seeking improved methodologies such as transferring/reducing non core risks. Chief Risk Officer appointed.</p> <p>Organisation and staff demonstrate risk management expertise in core competencies. Cross functional business units seamlessly coordinate and execute risk management initiatives.</p> <p>Formal cross functional business units report to risk management and coordinate decisions related to business unit basis. Some coordination between risk management, finance, internal audit and operations. Risk management roles and responsibilities clearly defined.</p>	<p>Risk profiles linked to corporate and strategic goals. Board and Executive management leading in risk management consciousness. Leading in key risk indicators which are related to strategic and corporate goals. Empowers strategic achievement and innovation with well understood and communicated limits of risk appetite and tolerance levels. Embeds processes and accountability in daily operations.</p> <p>Effective education and communication strategies integrated into organisations' governance and risk programs. Risk appetite and tolerance levels set at council level. Risk management is an explicit part of business planning. Reward for appropriate risk behaviors. Risk training is scheduled.</p>	
<b>Consistent-Implemented</b>	<p>Annual risk management plans created. Risk appetite statement in place. Strategic sourcing of key resources in place (defined policies, roles, and responsibilities).</p>	<p>Formalised risk monitoring and review methodologies allow for critical decision response for incident reporting and tracking and data repositories. Heat map and risk ratings produced with improved automation.</p>	<p>Risk management processes defined at the business unit or division level. Some internal strategic initiatives and collaboration established.</p> <p>Risk management processes and control management applied inconsistently. No formal procedures for compliance enforcement. Some use of risk management and control assessment templates and risk register.</p>	<p>Some capacities to track key milestones and compliance. Some analysis of trends, risks and assessment, compliance and performance measured regularly for appropriate resource deployment and decision making.</p> <p>Formal cross functional business units report to risk management and coordinate decisions related to business unit basis. Some coordination between risk management, finance, internal audit and operations. Risk management roles and responsibilities clearly defined.</p>	<p>Systematic risk monitoring. Tolerance and risk appetite defined. Basic information to facilitate risk oversight. Some linkages in HR policy as performance criteria in relation to risk management tasks.</p>	<p>Systematic risk monitoring. Tolerance and risk appetite defined. Basic information to facilitate risk oversight. Some linkages in HR policy as performance criteria in relation to risk management tasks.</p>	
<b>Consistent-Designed</b>	<p>Only occasional strategic focus on risk management and little long term planning. Informal policy guidelines and standards established.</p>	<p>Simple tools used inconsistently. Risk management often captured on spreadsheet and risk control strategies reliant on 'word of mouth' delivery. Data stored in folder/file structure and created using excel spreadsheets. Data synthesis predominantly manual.</p>	<p>No standard Risk Management processes and procedures. Lack of operational controls leads to uncontrolled risk loss. Risk management often ad-hoc and reactive. No structured employee education and awareness to risk management. Reactive risk management. Exception based reporting and analysis non-existent.</p>	<p>Unable to identify strategy impact on risks and risk incidents. Key risk indicators, risk appetite and tolerance limits unable to be determined. Compliance and performance measured manually on annual basis. Analysis supported by basic spreadsheets.</p> <p>Critical information not available. No capacity to track risk management and exposure through incidents and events. No capacity to evaluate operational controls and compliance. Compliance and performance measured sporadically. Manual reporting with limited data integrity.</p>	<p>Formal reports to Board and risk management. Some coordination of risk management decisions cross business units. A growing recognition of risk management and opportunities associated with an effective risk management function.</p> <p>Formal reports to Board and risk management. Some coordination of risk management decisions cross business units. A growing recognition of risk management and opportunities associated with an effective risk management function.</p>	<p>Risk management can inhibit performance. Poorly communicated, risk management may be misunderstood and taken as proxy for conservatism and risk avoidance. Decision making and risk consideration done infrequently and reliant on individual's skills.</p>	<p>Risk management can inhibit performance. Poorly communicated, risk management may be misunderstood and taken as proxy for conservatism and risk avoidance. Decision making and risk consideration done infrequently and reliant on individual's skills.</p>
<b>Inconsistent</b>	<p>Risk not addressed as a strategic opportunity. The organisation provides little risk management direction.</p>	<p>No risk compliance or performance monitoring methodology. No capacity to track trends or exceptions in risk categories and exposure. Data stored in paper format and analysis is manual and labor intensive. Risk rating created in basic formats such as excel spreadsheets. Unable to achieve predictive analysis. Exception based reporting and analysis non-existent.</p>	<p>No standard Risk Management processes and procedures. Lack of operational controls leads to uncontrolled risk loss. Risk management often ad-hoc and reactive. No structured employee education and awareness to risk management. Reactive risk management. Exception based reporting and analysis non-existent.</p>	<p>Organisation lacks a formal risk management process. Risk and loss control related decisions made on business unit level and led by Operations. Legal or Finance, with no collaboration or input from other business units.</p>	<p>Formal risk management and mitigation strategy. Risk management and business planning bears no correlation. Risk management serves to achieve organisational compliance. No alignment of risk culture.</p>	<p>Formal risk management and mitigation strategy. Risk management and business planning bears no correlation. Risk management serves to achieve organisational compliance. No alignment of risk culture.</p>	
<b>Low</b>							

Figure 8.2 Risk Management Maturity Assessment Tool

It will be seen from Figure 8.2 that maturity increases as risks are more appropriately and fully addressed, with greater monitoring and review by management and a willingness by participants to take responsibility for the process.

Few if any of the participants in the course approvals process (either academics or administrators) seemed aware of this material, much less the requirement by the NSW Auditor General that it be implemented in NSW universities from the start of 2017, although the risk managers interviewed for the research most certainly were, as were their interstate colleagues.

This suggests a serious gap between those responsible for risk and those responsible for course accreditation. The reason, however, seems fairly clear. Most (if not all) Directors of Risk associate risk more closely with finance than with course accreditation, and this is reinforced by the fact that much of the material on risk maturity has arrived as a directive from the NSW Audit Office – a body directly concerned with the oversight of finances and resources in NSW universities. It therefore remains the responsibility of each university as to whether the precepts it contains it should be extended further. It is also unknown that the long-term response of TEQSA will be, particularly if this regulator remains focused on risk.

#### **8.4.8 Risk management and course accreditation in the light of Institutional risk appetite and risk maturity**

Most universities tend to regard their committees as gatekeepers, one of whose tasks is to identify and avoid risk (Emmerich 2016). At the same time an increasing number of universities seem willing to take risks provided the benefit is greater than the loss (Selingo 2015). Informants suggested that most institutions are conservative when it comes to their reputation, status and professional standing but are generally more than willing to take risks with courses, provided there is unlikely to be a financial loss, and provided the institution remains within Commonwealth Government (and TEQSA) guidelines. At the same time the universities, despite everything said to the contrary, appear to be frightened of tighter government regulation, and informants suggested that they will do everything possible through their internal practices to ensure that it doesn't become necessary (Kamvounias, Squelch & Varnham 2015).

Informants were divided on whether a more tightly controlled governance structure may or may not occur and whether it may or may not impact on risk in course approval. Tighter university governance generally means a tighter procedure, but this may not necessarily be linked to risk avoidance or mitigation. The key it would seem is not simply the text of procedures but the diligence and intelligence with which these procedures are interpreted, and this requires the training of staff.

According to the NSW Auditor General, the training of staff in this area is not something for which Australian universities should take pride. The NSW Audit Office has placed the following burden on the universities under its control, stating in its 2015 report to Parliament:

##### **Governance**

Recommendation:

**Universities should develop and communicate a risk appetite statement and set risk tolerance limits to ensure they operate within their risk appetite.**

Universities encounter risks every day in pursuing their objectives. Clear guidelines on the level of risk considered acceptable and the degree to which risks can be tolerated is a key step to towards optimising risk management maturity.

Risk appetite is the amount of risk a university is willing to accept in pursuit of its objectives and value. As such it should broadly understand the risk it is willing to accept in

doing so.

Therefore, a university should determine its risk appetite when it decides which objectives to pursue and communicated this in broad terms throughout the university.

To operationalise the risk appetite within each faculty, school and business unit, a university will need to determine the risk tolerance applicable to each specific objective. Operating within risk tolerances helps ensure the university remains within its risk appetite.

Most universities lacked regular risk reporting by faculties and business units, and risks in local risk registers were not promptly escalated.

All universities have taken steps to improve their enterprise risk management framework.

### **Systems and Processes**

Recommendation:

**Universities should improve processes for tracking, monitoring and reporting emerging risks.**

In most universities, risk management processes were not fully standardised and enforced. Out-dated risk prioritisation and inconsistent application of risk management processes were evident. Some universities have purchased risk management software solutions, but there is no evidence they have been implemented and are in use.

Most universities use basic spreadsheets for risk registers. Consequently, risk reporting is reactive and does not support decision making processes.

Implementing a technology based solution may help universities ensure frequent and consistent risk reporting, proactive monitoring of changes in Key Risk Indicators and improve business resilience to rapid changes.

Dynamic dashboard reporting helps provide executive management with an overarching view of the internal and external risks and enhances agility in pursuing new opportunities.

### **Culture**

Recommendation:

**Universities should design and implement consistent risk management initiatives across faculties and business units. The initiatives should link key performance measures to key risk indicators.**

Enterprise risk management is not isolated from business strategy, planning or day to day decision making, nor is it about compliance. Enterprise risk management should be part of the university's culture and the way decisions are made on a day to day basis.

Most universities have started to embed risk awareness cultures, but this is inconsistent across business units and a lack of depth throughout the faculties.

Most universities have a low risk appetite for risk exposures that may significantly impact their university's reputation.

*(Audit Office of NSW 2015)*

When asked to respond to this, the majority of informants - or at least the few who were aware of the issue - said that their institution believed that it would be impractical to release staff for a crash training program in risk management - there was simply neither the time nor the availability of replacements while the training was in progress. Eventually staff would be retrained, but this could take a considerable period and could not be done overnight. In the meantime, it was faster and more efficient to rewrite procedures - particularly if the rewriting of these procedures was a task required by other bodies (such as TEQSA) that would be necessary in any case - and then to instruct staff to follow these directives with the greatest diligence.

The emphasis on procedures would appear to be the reason why so many of those responsible for the accreditation of courses in Australian universities claimed to have little if any knowledge of risk management, even though it was clear that this had been factored into the system. It would seem from the comments of informants that risk management in all areas is currently being achieved through the enforcement of procedures rather than the conscious effort of staff.

## **8.5 Anomalies and unresolved issues regarding risk and course accreditation**

This section covers a number of issues related to course accreditation, most of which can carry substantial amounts of risk. Unfortunately, there was insufficient time to explore many of them and they may provide fruitful areas for future work.

### **8.5.1 Offshore teaching, and teaching in languages other than English**

As previously mentioned, it would seem that the vast majority of course accreditation procedures simply cannot accommodate courses taught offshore or in languages other than English. In most cases these proposals are assessed as though they would be offered in Australia, or taught in English, followed by a separate procedure to equip them for offshore delivery or for local delivery in another language. This remains a source of chronic weakness from a risk perspective, and a number of informants advised that to circumvent this their university had imposed either a blanket ban on the delivery of courses in any language other than English, irrespective of the location of delivery, or had added additional controls.

The Australian National University states:

1. English is the primary language of instruction for ANU programs and courses, with the exception of education that aims to develop proficiency in languages other than English.
2. All ANU programs and courses that are not either taught in the English language or education that aims to develop proficiency in languages other than English must be considered for accreditation by Academic Board.
3. Approval will only be given for a program or course to be offered in a language other than English where there is a demonstrated strategic benefit to the University and whereby adequate and regular monitoring and review systems are in place. (Australian National University 2017)

Offshore teaching by a wholly owned university entity such as Monash Malaysia presents additional difficulties. As a normal policy, all courses to be delivered offshore must be assessed in the normal manner in Australia - and must therefore meet Australian requirements - but may then require separate and additional approval by the regulatory body of the country where the teaching is to be undertaken. To avoid substantial delay where one party may require change that the other must subsequently approve, this is normally done concurrently through the appropriate member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) (TEQSA is a member of INQAAFE and since 2017 oversees these arrangements and assists where necessary

with negotiations). The task is normally the responsibility of the faculty and commences after approval has been given by the institution's Academic Board – evidence of local approval is essential before overseas approval can be requested - with Academic Board being advised of the outcome once overseas approval has been gained (INQAAHE Procedures Manual 2018).

There are many risks in offshore teaching, not all of which are financial. The manual governing the assessment of risk in these circumstances is the Commonwealth Government's *Good Practice in Off Shore Delivery: A Guide for Australian Providers*, (Dept of Education, Employment and Workplace Relations 2008) a handbook that covers all levels of post-secondary off shore teaching, both Higher Education and VET, and is obligatory for Australian universities.

The *Guide* lists six areas of Risk that providers should take into account when courses are developed.

- Equivalence and Comparability of programs
- Quality Management Systems (in both countries)
- Business Management
- Associate Selection and Relationship Management (including cultural sensitivities and local regulatory requirements)
- Learning, teaching and the student experience
- Staffing and Professional Development, particularly where local staff are recruited

It would seem that as a general rule, these issues are taken seriously by universities, but this is done by faculties and international offices rather than by academic boards. According to informants, many members of academic boards or courses committees may be unaware of these guidelines, as there is no need to apply them to programs offered solely in Australia, and as such there is little reference to these matters in course approval documentation.

### **8.5.2 Teaching through offshore agents**

The same rules apply when teaching is delivered by offshore partners, although in this case further checks are normally made to confirm the ownership, reputation, reliability and financial viability of the provider, particularly when the award is conferred in the name of the university in Australia. As a general rule, the university maintains the right to oversight the selection of staff (although these are paid by the provider rather than the university) and the recruitment of students (including advertising), with the university monitoring assessment, either by cross marking a selection of papers or by undertaking the task itself. Relations with local regulators, on the other hand, are normally handled by the partner rather than the university.

This raises a number of issues, particularly when local regulators required amendment to the original proposal, sometimes to avoid political or cultural sensitivities, but more frequently to bring the teaching and assessment into line with national standards. These are normally made without question, but there was great uncertainty whether these changes were always reported to the academic board of the parent university – a task that would normally be considered a faculty responsibility.

As in the case of offshore teaching through entities, there is little mention of the need to report local variation in institutional procedural documents.

### **8.5.3 The approval of online and other non-traditional modes of teaching**

There is little mention of this in published course accreditation procedures, other than the fact that courses of this type are required to go through the same process as those taught face to face. Not all Australian universities offer distance education, and where this is done by traditional means (although packages through the mail have become obsolete, and almost all delivery is electronic) the only

additional requirement is evidence that the university has the staff, equipment and resources to service these programs – a matter normally confirmed at the initial course proposal stage. As there is little variation from face to face teaching (apart from the physical separation of student and lecturer) there is normally no mention of any additional requirements for non-face to face delivery in the procedural documentation.

The situation is different, however, where courses are delivered in real time (such as through electronic chat rooms) or by less conventional means, as in the case of students with i-pads or mobile phones that give instant communication. The situation is made even more complex when this electronic delivery is interspersed with video cuts, access to texts, the snap writing of responses, or lightening tests. These are quite different from what is possible in a traditional lecture theatre and, if uncontrolled exposed the university to considerable risk, the greatest fear being a deliberate breach of copyright, followed by the use of profane, abusive or offensive language. [Informants noted that students were much freer with their comments while sitting at a keyboard and if unaddressed this could be seen as condoning bullying]

In virtually all cases, Australian universities make no attempt to assess the mode of delivery as part of the approvals process. Delivery is considered the responsibility of the institution's teaching and learning committee, the faculty or the individual lecturer, not the course accreditation panel. There is a point, however, where a projected mode of teaching may have an immediate impact on the student experience, or where obsolete methods may damage the reputation of the university. Informants were clear that proposals of this type could not be recommended to academic board, irrespective of their content or rigour, and for this reason were sent back to the faculty. At the same time there is little mention of this aspect of assessment in course accreditation procedures – indeed the majority of assessment procedures specifically exclude course delivery from the terms of reference of committees.

The broader question was raised with informants of those issues that made programs unacceptable, irrespective of their merit (such as those that might offend racial or religious sensitivities) and it was explained that this culling was always done under local delegation. There was no authority in procedural documentation to decline courses on these grounds, but no one raised any objection when it occurred, and if there was an injustice an appeal could follow. Great latitude was allowed to almost all committees in this regard as part of the mechanism for protecting Academic Board and the university. The difficulty from a risk perspective, however, is that there is little if any reference to this in the procedural documents, nor (apart from common sense and academic responsibility) are any bounds established for this behaviour.

#### **8.5.4 Variation in protocol for special cases - a search for the core or canon of the accreditation process**

The majority of informants advised that while the course accreditation procedures of their institution were regarded as the norm they were never regarded as tightly rigid or inflexible, and if the circumstances required one or more stages could be omitted for the sake of convenience or emergency.

At the same time, not everything in published procedures could be avoided. It would seem that there must be some absolute minimum – the essential core of the process - that every institution believed should be retained, irrespective of the urgency. Just what this minimum might be, however, appeared to vary from one informant to another. Senior managers, for example, were more than willing for proposals to be approved by executive authority without the need for passage through the various committees provided the program was deliverable, was cost effective and the need to by-pass established procedures sufficiently great. Administrators, on the other hand, were alarmed by omissions that could lead to chaos in records or subsequent course management, while others (particularly academics) were concerned that failure to provide forums where disciplinary boundaries

were discussed could lead to turf-grabbing, within which others claimed areas that informants felt should be left in their own possession, even if nothing was being offered in that field at the moment.

It would have been helpful if the core or canon of the course approvals process - the things that could never be avoided under any circumstances – had been identified. Unfortunately, time and the diverse views of informants made this task impossible. Despite this, it would seem that there must be some absolute minimum that staff and their employers are prepared to accept, even if this is nothing more than a mental construct, or the point beyond which confidence in the process - or the products of the process - might be lost. It is hoped that this could be investigated further by a future researcher.

### **8.5.5 The appointment of, and role in the accreditation process, of course coordinators and other staff**

Few of the published course accreditation procedures make any mention of the appointment of a course coordinator or the other staff necessary to mount a course. Most of the more technical programs cannot commence without other specialists in attendance – some of whom require licensing to satisfy government requirements – such as anatomy attendants, safety officers, clinical placement staff, and so on - while others such as high fee postgraduate courses may need dedicated administrative, liaison or financial officers to provide a superior service. There is little mention of any of this in the course accreditation documentation.

Virtually all Australian universities make extensive use of course coordinators for the day to day management of programs and most provide instructions for their guidance. While these directives are often quite specific, few mention any role for these persons in the course approvals process, and it would appear that in the vast majority of universities, course coordinators are not appointed until after a proposal has been approved.

Edith Cowan University (2013) – a typical example - suggests the following roles for course coordinator:

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The Course Coordinator is responsible for:

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- ensuring the course is informed by meetings of the Consultative Committee;
  - ensuring all course details are current in the CMS;
  - ensuring a strategy is in place to enable the course to meet minimum satisfactory levels on the Engagement Mapping Index;
  - ensuring the course develops and assesses students' achievement of graduate attributes;
  - ensuring there is a benchmarking strategy in place for the course;
  - reviewing the Course Evaluation Questionnaire (CEQ) and mid-course CEQ data and addressing issues where possible;
  - ensuring the course demonstrates teaching informed by research;
  - compiling unit moderation reports for all units;
  - completing the annual Course Coordinator Report; and
  - monitoring the delivery of all units to identify those which may not be meeting ECU policies, procedures and guidelines
- 

Despite this, quite a number of universities appoint an *interim coordinator* or *facilitator* (interim course coordinators normally receive an allowance while facilitators do not) to manage the program through the final stages of the approvals process, particularly when a new discipline is being introduced and a considerable lead time is required. The program is often not officially approved at this stage, with the final threads still to be drawn together. In almost all cases, it is essential for the university to make a considerable investment in resources, instruments, labs, library books and other facilities well in advance, a situation that could leave Academic Boards with no alternative, once the money had been spent, to approve the proposal irrespective of its content.

Informants suggested that the situation was as bad as this might imply, as approval to spend money is given by those who make a decision on the initial course proposal rather than those assessing the final course documentation. The university makes a commitment to enter a particular area – a planning decision that is normally made in isolation from Academic Board (albeit nominally as a large number of the same people may be involved). Academic Board, in turn, approves the final structure, the assessment and the academic rigour, not the decision to commence that particular discipline. This in turn means that an interim coordinator – sometimes an administrator rather than an academic – may be appointed quite early in the process, a point that is rarely made clear in the approvals procedure.

It was originally thought that the role of interim coordination would fall upon the course developer, but informants advised that in the majority of cases these people were either unavailable or unwilling to accept the often mundane tasks for which the interim coordinator was responsible. The question that remained unresolved, however, was the ongoing relationship between the interim coordinator and the course developer as the documentation was being prepared. A minority of informants suggested that interim coordinators could exercise enormous influence over what courses contained simply by their actions (or inactions), and that this might explain a number of anomalies in final programs. These include issues such as clinical placement, practice teaching, field studies and certain laboratory classes – all of which make disciplines such as Nursing, Teaching, Social Work and Introductory Science hard to timetable as they fall out of kilter with the rest of the university. Most informants felt that course developers maintained fairly tight control over interim coordinators, and that most of these anomalies – which it was agreed were hard to administer - were the result of practical logistics rather than malignant intent on the part of interim coordinators. Much greater difficulty occurred if Deans replaced course developers part way through the process and a new repour with interim coordinators was required.

There is little indication in course approval documentation of the point at which interim course coordinators handed over their responsibilities to those appointed substantially to the position. There was almost nothing in the published documentation about the role of course coordinators (either interim or substantive) in the approvals procedure either. Informants suggested that this was an internal matter, legitimised by custom or habit, and as such needed no mention. At the same time the omission of this information could lead to inconsistency or omission and presents risks in its own right.

#### **8.5.6 The process after a course is approved**

As mentioned previously, most course approval procedural documentation ends at the point where Academic Board approves a course proposal or alternatively at the point when Academic Board endorses a particular award to the University Council.

Despite this a great deal must be done between the point at which a course is approved and the commencement of the first session. Academics and administrators differed in their responses. To academics it would seem that the most essential thing is to have everything ready for the first lecture. Thus, there is an emphasis on subject outlines, class lists and enquiries about shortages which affect the availability of facilities and resources. Administrators have a completely different perspective, that of providing these resources, maintaining records, providing turnstile figures to the university, and the ultimate sustainability of the program.

The first task after approval is to register the award with the Commonwealth Department of Education and Training. This is normally done by the institutional Governance Support Unit or equivalent following approval of the qualification nomenclature by the University Council and is viewed in most universities as a purely governance function that requires little academic or administrative input. In general, the Department of Education and Training is passive in accepting requests for the registration of awards from the public universities, although perhaps less so from self-accrediting private

providers. (It should be noted that only the name of the award and the provider is registered by the Commonwealth (*Informant 12*). Little reference is made to the details in the course documentation, apart from occasional checking – less so for the public universities – that the proposal satisfies the AQF.)

No university can afford to wait until a new award is registered, however, and in the vast majority of universities virtually of the “behind the scenes” tasks, such as data entry, the preparation (but not the publication) of publicity, and so on, are done well before final approval, essentially to save time, with the input kept inactive on the system.

One major bottleneck identified by virtually all informants was the institutional printery. [Most Australian universities prefer to have their printing done in house as this is often cheaper than commercial outsourcing. It also enables material – which may be commercial in confidence – to be controlled]. The extensive use of the printery (called “Reprographics” in many institutions) means that it is often the printery schedule that sets the timetable for many of the other functions associated with new degrees before their release to the public. It is difficult, for example, to advertise courses without brochures, and the production of this material in time for Open Day is considered essential. Most printeries work on a queue system, with the first to arrive being done first, an issue that gives rise to disputes where more senior staff get their work in late but claim priority. Informants suggested that this was particularly acute when it came to the printing of subject outlines in December and January, many of which were held off until the last minute to accommodate changes and uncertainties. It was for this reason that most universities now place this material on their website and keep hard copy to a minimum. (Most universities require a hard copy of the subject outlines for each semester be deposited with the course documentation in the institutional archives in case legal action occurred, and for this reason printed material could not be eliminated entirely. Informants noted that staff were often tardy in this regard, and as follow up was impossible, the matter constituted a further risk)

An additional bottleneck to the mounting of courses is the absence of academics over Christmas and January. While a skeleton faculty may be on duty, informants noted that its members were often reluctant to intervene in any course with which they are not immediately involved, thus placing the interim coordinators or facilitators in a difficult position. For this reason, any enquiry or clarification that might be needed to be in place before the marking cycle concluded in late November, after which course developers may well become unavailable. Again, this sets the timetable for a host of administrative tasks, most of which are sufficiently routine to pass without notice unless disruption occurs. Informants said that it was not unknown for staff to return in the first weeks of February and want significant change made to their course. If this was purely operational - such as a change of rooms or timetables – it could generally be managed through a request from the faculty. (As a general rule, Australian universities insist that all changes, no matter how minor, must be made through the faculty, never by individuals making direct contact with administrators). If, on the other hand, the change involved a significant departure from what was previously approved by Academic Board - perhaps the deletion of a subject and its replacement by another - nothing could be done until an amended document had been signed off by an authorised person. Informants said that the need to say “No!” under these circumstances presented many challenges to administrators, as well as frustration to academics.

Most universities do in fact have a tightly structured internal schedule for the processing of courses between the time of approval and the commencement of teaching, although this is rarely made public or shared with academics lest these timetables and staff workloads be disrupted by senior staff claiming priority. Informants suggested that the activity that occurs between the approval of a course and its initial commencement was an unexplored area of higher education, and that more should be made known as it is often at this stage that course become prone to risks and errors.

## 8.6 The role of risk managers in the course accreditation process

It would appear from the comments of informants that institutional risk managers have little to do with the course accreditation process except at the very beginning (when their advice may be requested on the financial risk at the initial course proposal stage) and at the very end when they may be asked to review the safety of programs before their commencement. There is normally little, if any, contact between risk managers and the course accreditation committees of Academic Boards, nor is their advice sought at any stage.

Unfortunately, few risk managers were available, but those with whom this was discussed suggested:

- Risk managers are not directly involved in course accreditation but are vitally interested in any risk that may arise from institutional operations. Thus, they are not disinterested in the material that may pass through the accreditation process even if they can make little contribution to the process itself.
- Risk managers are rarely consulted about any except the most obvious risks, and these almost always involve work health and safety issues rather than the more serious risks faced by the institution, such as the potential for financial misappropriation or damage to reputation. This in turn means that there is little contact between risk managers and course developers, with most discussion involving faculty managers or other administrative staff.
- Risk managers have no right of veto on courses, nor do they normally have access to Academic Board or its committees. The most that a risk manager can do is to express concern to the Dean or (failing that) to their superiors or other officers and leave it to them to take whatever action may be felt appropriate.
- Risk managers are constrained in their duties, and while they would be more than willing to investigate the potential for risk in courses, the pressure of work - particularly in audit and finance, their area of greatest responsibility in most universities - prevents them from doing so.
- Risk managers freely acknowledged their lack of experience in Education (most come from a management or finance background) and felt unqualified to comment on educational risk. At the same time, they were more than familiar with other aspects of risk – particularly in a corporate environment - and suggested that their services were under-utilised. Risk managers were most anxious that they not be seen solely as de facto internal auditors with a responsibility for reviewing debts or catching defaulters. While this was often the intent of the university (particularly when the risk manager was seen as an advisor to Council rather than the university as a whole) this was not seen by the risk managers themselves as the best use of their skills, particularly at a time when bodies such as TEQSA place such a heavy emphasis on risk.
- Risk managers suggested that there were five factors that are frequently overlooked by academics (and often by university staff as a whole) that have a direct impact on risk in courses:
  - Insurance and risk liability. Universities must ensure that they have adequate coverage for all aspects of their operation both on and off campus, and this includes teaching as well as all other activities. There was rarely any mention of this in course documentation.
  - Copyright and intellectual property. Academics regularly cite the work of others, and this is completely permissible provided the source is attributed. At the same time this encourages a carelessness in classrooms where charts, slides, extracts and indeed whole

lectures may be taken from somewhere else and, even if attributed, may still breach copyright. This is particularly the case where MOOCs (Massive Open Online Courses) are involved. There would seem to be an assumption that because MOOCs are so readily available their content is free for use by anyone. This is not the case and the inadvertent breach of copyright remains a source of considerable concern.

- Student welfare outside the classroom. Most academics are aware of their responsibilities when teaching students but forget the obligations of the university at other times. This includes both moral and physical safety before and after class, or while engaged in university sanctioned activities (including sport, drama productions, etc). It also includes a duty of care for those living in residential property. Much of this is uninsurable (apart from a legal liability for negligence) but any incident could have serious impact on the reputation of the university. Staff, in setting work, need to place greater weight on the implications for out of classroom activity, including meetings for group work, readings and informal discussion.
- Bullying and sexual harassment. Neither is a new issue in most universities but can be promoted through excessive competition in the classroom as an educational strategy. Most universities are reactive in these matters - in other words they deal with incidents after they occur - rather than proactive in preventing them from happening in the first place. It is the task of risk managers to minimise the possibility of harm from any university activity, including courses.
- Administrative malpractice. Administrative malpractice - which can involve a breach of the spirit as well as the letter of university requirements - often causes distress to its victims. Risk managers suggested that most instances of malpractice were inadvertent rather than deliberate, often caused through pressure of work (such as staff failing to act in a timely manner) or failing to consider the complete picture (such as special requests), and that cases of deliberate malice were rare. Risk managers were anxious, on the other hand, to prevent both types of problem, as both have the potential to lead to student suicide. [Examples were cited where students had been unable to keep going because of the pressure of work and the fact that all assignments fell due in the same week. In other cases, students had requested leave, but had committed self-harm while staff dithered on whether the regulations allowed it to be approved. It would appear from discussions with Risk Managers that the risk of suicide is an unacknowledged fear in many universities and that its resolution requires input from groups far wider than the Counselling Unit]. Other examples of administrative malpractice included a failure to warn about unexpected fees, outdated information on the technology used for teaching, obsolete textbook lists and vague or impractical instructions regarding assessment. None of this was meant to cause intentional harm but collectively could inflict irreparable damage to reputation of the university and was a risk that all would like to avoid.

Risk managers were asked if they believed that most of these things could be resolved through improvements to the internal procedures of the institution. The answer was that while this could be done -and most universities at least made some attempt in this direction - it was necessary to identify potential problems in the first place, and this required the skill of a person experienced in the role. The difficulty lay in the fact that risk managers tend to be at arm's length from administrators and at an even greater distance from academics and teaching staff, and that their advisory role was ill defined ("*No motorist appreciates a policeman telling them how to drive*" – Informant 38). What was of even greater concern to risk managers, however, was their sense of isolation from the university as a whole, and the fact that their advice often seemed to be disregarded by the rest of the institution.

The information provided by the few risk managers who were interviewed conflicted strongly with the assertion of most informants that these persons had little interest in course approval, and hence

could play no role in the process – although it must be admitted that some of the things that risk managers were seeking (such as freedom from risk) were not the same as those considered necessary by the mainstream university. (“Most staff are seeking benefits [*from the assessment of courses*] – risk managers would be looking for traps” – Informant 38). It would seem that risk managers may be far more interested in course accreditation than might be imagined, but would be viewing it from a different perspective, even if given greater voice in the process.

## 8.7 Articulation from other providers

Articulation is the name given to the procedure for awarding block credit to graduates from another provider under a formal written agreement with that provider. Universities do not require all new students to start at the very beginning. If they already have some background in a particular discipline (perhaps through the completion of a VET award) they may be given advanced standing in their new program and commence their university career at the start of second year (or even later depending on the course). To avoid uncertainty this credit is guaranteed by the university and may be a valuable marketing and cost saving strategy that shortens the length of enrolment while giving students a pedagogical advantage.

In some universities these arrangements are handled internally between the faculty and the originating provider (or between the provider and the International Office). This may lead to accusations of inconsistency or bias – with certain providers claiming that the graduates from others are given greater credit than their own - and for this reason, Academic Boards often sought the advice of their courses accreditation committee (or equivalent body) when a request for a formal agreement is made.

As a general rule, the procedure for assessing articulation requests was similar to, but kept separate from, the normal course approvals process, mainly because the additional tasks required (such as a verification of the credentials, standards and reliability of the donor institution) were unnecessary with in-house course proposals. The key problem was often a lack of information. If the originating provider was local (such as a neighbouring VET college) it would be possible to visit the site, review the staff and note the quality of teaching and assessment, although this was often omitted where the provider was well known and of sound reputation, such as NSW TAFE. This was less easily done in the case of interstate or offshore providers. While most Australian universities tried to conduct some physical assessment of remote institutions, this was often hurried or impossible, particularly when pressure was coming from the International Office, and the university had to fall back on second hand information, such as the names of other tertiary providers with whom previous arrangements had been made.

This exposed the university to risk, and - unless appropriate diligence is done - could become an area of serious threat. Universities are often assessed by the company they keep and their linkage with academic partners. If an originating provider is of low standard – or worse, nothing better than a degree mill (if in fact it exists at all) – it is likely reflect badly on those universities offering credit to its graduates. For this reason, references may be required, or the first cohort of students given credit “on sufferance” until their merit is proven.

While there has been considerable work done on the success or otherwise of the students who have taken advantage of articulation agreements (such as Hannon, Smith & La 2016, or Yorke 1999) it would appear that there has been virtually no research conducted into the way in which articulation arrangements are solicited, agreed upon, processed, or managed in Australian universities. As far as can be determined, all Australian universities have a policy on Articulation but few if any publish their procedures for vetting partners, and if this vetting is inadequate this may become a major source of risk. Most informants, when the issue was pressed, said that they were unaware of just how this was done, and suspected that much depended on how desperate the university might be to increase its enrolment in particular programs or to gain other benefits from a closer relationship with a provider

(particularly if a base for overseas teaching was required). Informants were either unable or unwilling to comment on the attrition rate for these students, or the time taken to complete awards.

It was suggested that, in general, articulation was a side issue for most Australian universities, although those close to the student body felt that the quest for numbers increased the possibility of failure by allowing ill prepared students to miss the introductory parts of programs. It was noted that while students who had completed VET awards in Australia or overseas may have covered the *content* taught in first (or even second) year of a university award they were rarely required to exhibit the analytical skills expected from students in Higher Education. This, and the lack of procedural documentation, meant that certain risks were inherent in all articulation agreements, but that this could be tolerated provided the numbers remained small. On the other hand, a significant increase in students entering via this pathway may well lead to a tightening of requirements that could spill over into wider course accreditation procedures. Informants pointed out that there was a TEQSA *Guidance Note - Third Party Arrangements* (TEQSA 2017g) - that canvassed the risks of articulation, along with a number of other issues, although as this form of guaranteed credit had become a marketing instrument most universities were holding off until they could see what their competitors were likely to do. *[TEQSA Guidance Notes are advisory statements of best practice rather than obligatory directives, although institutions may be required to justify their position if the advice contained is completely disregarded.]*

## **8.8 The university as an examining rather than a teaching body**

The traditional universities of Europe and the United Kingdom were examining rather than teaching bodies, with the instruction of students being conducted under private arrangement in affiliated colleges with the university setting the curriculum, assessing students, and conferring degrees (Rashdall 1895). The “university” itself was a base for scholars but offered no teaching, and might well be located in an obscure corner, with visitors mistaking the colleges for the university (Brockliss 2016).

While a similar arrangement was originally intended for the Universities of Sydney and Melbourne the absence of qualified instructors made this impossible, and for this reason the colleges affiliated with Australian universities - originally church based - became places of residence only (albeit with additional limited instruction and close student supervision) while all formal instruction was provided by the university (Forsyth 2014).

The ghost of this arrangement has always lingered, particularly in the theological area, where teaching has long been conducted in denominational seminaries while the assessment of students and the conferring of awards has been done by a centralized body recognized by the government, such as the Melbourne University of Divinity, the Australian College of Theology or Sydney College of Divinity. It has also occurred increasingly in recent times with the mainstream universities allowing the teaching of interstate awards by local providers under licence to the university, with the university monitoring progress and conferring the award. It is believed, for example, that there are at least twenty Australian universities operating in the greater Sydney region. While seven of these are locally based – the Sydney campus of Notre Dame is now regarded as a local university – many of the others provide teaching through agents, with most targeting international students.

The role of universities as examining, as opposed to teaching, bodies has increased in Australia through the use of *challenge* exams, whereby students who believe that they have gained the outcomes expected from a subject – but who lack confirmatory proof – can apply for assessment by a provider (for a fee), and if successful can gain credit for that subject if they enrol at the institution. This is an emerging trend that has been encouraged by the growth of the private sector, as it is much cheaper for the public universities to examine students than to teach them. (It is also a useful way of

attracting overseas students, particularly if challenge exams can be attempted before leaving the student's home country. The student knows in advance that they will be given credit, but only at that particular institution, and hence becomes locked in with that body.)

A number of informants were concerned with the administration of challenge exams (which at the moment are conducted solely by the faculties in most universities) and suggested that students should at least be registered with the university before taking the exam, and that the exam itself should be conducted by an independent invigilator. Others noted that there was no common scale of fees for this service (most fees are set and collected by the faculty) and that few records seemed to be available, particularly of students who failed. While none of this impacted directly on course assessment, the process contained risks that a number felt may be carried over to accreditation procedures in the future. This was particularly the case where faculties sought the right to accredit their own courses from start to finish before referring them to academic board for approval – a process that would save time and money by eliminating many of the current checks and balances, but which would void the centralised control over the process that exists at the moment. Informants suggested that such things were becoming increasingly possible with the growth of “mega-faculties”. The role of the wider university would be simply the assessment of outcomes after the event rather than any check on the means through which these outcomes were achieved.

## **8.9 The cost of course accreditation**

It would appear from informants that few universities have undertaken any costing of their course accreditation procedures. When questioned further, most informants suggested that as the cost of this activity was shared across numerous cost centres, it would be extremely difficult to dissect this figure with any accuracy. At the same time, it was realised that failure to appreciate the cost (which in this case should be seen as part of a wider investment in quality) it would be impossible to determine whether procedures were cost effective and whether the university was receiving value for this expenditure. (A view shared by Kirshstein & Wellman 2012.)

Informants agreed that the actual cost of course accreditation – while unknown – was likely to be substantial, although as it was spread across many areas of the university, this was normally overlooked and when questions were asked would be hidden within the vast grab bag of “operating expenses”. (Informants indeed seemed extremely embarrassed that the question be asked and that they should be unable to provide an answer). Those working on the financial side of the administration suggested that while it might be possible to determine the administrative cost of course approval (based on the number of staff involved, their salaries per hour and the number of hours committed to the task) there were few staff who did nothing more than course accreditation, and any figure derived would almost certainly be a guesstimate of doubtful validity. This uncertainty increases incrementally when the cost of academic input is considered, particularly if one includes the foregone cost of the time spent by senior staff in meetings and committees, the need to produce and read papers, and the fact that many who are engaged in this activity are forced to take time from their normal duties to perform this role – and hence may be sacrificing activities that are more obviously and immediately revenue generating.

The closest parallel for which figures could be supplied was the cyclic review of courses. All universities set limits on the period of approval – in most institutions from five to seven years, although a shorter time can be specified if uncertainty exist. At the end of this time, courses must be reviewed before approval is given for them to continue, in some cases using an external panel, although this is expensive and for most purposes an internal panel is preferred. The funding for reviews was normally set aside as a separate line in the faculty budget – it would appear that faculties bear much of the cost of this activity – and while there was an administrative cost beyond this that could not be included (administrative costs are funded centrally and closer dissection is impossible) it would be reasonably easy to estimate this cost, based on the activities involved, the level of staff and the time commitment.

It was suggested that the direct cost of an internal course review in an average university varied from a back of the envelope \$10,000 to \$100,000 per episode (normally a family of related courses would be reviewed at the same time in each episode, rather than each course individually, with the figure quoted being the cost for the total activity rather than the cost per course) depending on the institution involved and the procedures used. Of this, approximately two thirds of this cost would be met by the faculty with the remainder being drawn from general funds. If an external review was required the direct cost – perhaps surprisingly – was often less, as while travelling expenses, accommodation, and perhaps a small honorarium were paid by the institution being reviewed, the cost of participants from other universities was normally met by their home institution on a quid pro quo basis, and was not drawn against local cost centres. At the same time an external review may expose the university to greater cost – and far less benefit to itself – when the service is reciprocated.

While it may be erroneous to compare the cost of course approval to the cost of a course review, informants suggested that similar figures were likely to apply, and that it would cost at least \$8,000 to \$10,000 (partly in foregone costs) to have a proposal approved – a figure not including the drafting or copying of documents or the cost before endorsement by faculty boards. Despite this, and even if such a comparison is misleading, it can still be assumed that the cost of course accreditation is far higher than many think. Although the greater part of this tends to be hidden from the university community and its regulators.

The question of whether a university receives value for its money cannot be answered, possibly because no figure can be given for the benefit gained by a well assessed course over its poorly reviewed counterpart.

There have been a number of reports commissioned by the Commonwealth into the costs associated with the operation of universities in Australia, the most recent being the *Deloitte Access Economics Report of 2016*, but these do not involve a breakdown of internal costs. This report was also criticized for taking data from only 19 of the 40 Australian universities, for making selective assumptions, and for its subsequent use by the Commonwealth to justify a reduction in funding (Hughes-Warrington 2017).

It would appear from the remarks of informants - and perhaps even their surprise that such questions should be asked in the first instance – that there has been little work done on the cost of course accreditation in Australian universities. While it is not the place of the researcher to impose tasks on others, the fact that there would seem to have been no cost-benefit analysis of this activity suggests an area of omission that may be of vital importance in the future.

## **8.10 Incompatible systems, such as course accreditation, as a means for preventing consolidation and outsourcing.**

This section has been difficult to write lest thoughts and fears disclosed in confidence be betrayed, something the researcher is anxious to avoid. At the same time, outsourcing has become a common practice in the commercial world, where tasks that do not require the constant attention of staff (or which, through economies of scale and alternative wage structures, can be done more cheaply elsewhere) are allotted to others under contract. Outsourcing may also allow the work to be done more efficiently by entrusting tasks to those who through constant exposure have become specialists in their role, and where the economies of scale this produces may allow significant savings.

Australian universities have been slow to embrace outsourcing, and in fact the only areas in which it has become common are payrolls, cleaning, security, I.T., and building maintenance. Virtually everything else is done “in-house” even if the task is occasional rather than constant.

As mentioned in Chapter 7, most administrative staff fear outsourcing as a threat to their continued employment, particularly where tasks are seasonal or where practices are so common between

institutions (such as the submission of returns to the Commonwealth Government) that they can be done in bulk anywhere rather than on the campus to which they apply. The question asked by the researcher – albeit indirectly in many cases - was “Does this fear include the tasks associated with course accreditation?” as the uncertainty this produced might be a further source of risk.

Informants from several universities advised that one of the protections that staff in Higher Education enjoyed was the fact that the systems of their employer were incompatible with the procedures used to achieve similar outcomes elsewhere. Thus, it would be expensive, if not impossible, to outsource or combine the majority of these systems, even if this was desired by accountants and efficiency experts. Most of the staff in universities were against outsourcing - the administrators for fear of job losses and the academics because it would isolate them from those on whom they depended, particularly where their proximity allowed them personal contact as opposed to dealing with anonymous and remote contacts by phone or e-mail.

The avoidance of outsourcing, informants suggested, was one of the primary reasons why there had been virtually no enthusiasm about attempts to harmonise course approval procedures across the sector, despite the pressure of regulators and the savings and benefits this might bring. Thus as long as there is a significant difference between the accreditation procedures of Australian universities it will be extremely hard to either consolidate or outsource them, and this in turn will maintain the status quo. The frankness with which informants provided this insight was much appreciated.

## 8.11 Forced changes in accreditation procedures

While institutional staff may be happy with the present situation this is unlikely to be true of regulators and senior executives as there is much to be gained from a greater standardisation of approval procedures across Australian higher education. As a result of this a number of informants - particularly those with administrative responsibilities - felt that change would be forced upon the sector, whether the staff or their universities wanted it or not.

There were five factors likely to drive change:

- A need to reduce the cost and complexity of accreditation procedures – While no one could give a precise figure for costs, almost all agreed that present procedures were both expensive and frustrating, and as regulatory demands increased, this would only become worse. It was felt that rising costs would force a simplification of the process, although few agreed on the details of how this might be done while maintaining the present outcome.
- The need for greater control by governments – Informants noted the pressure being exerted by governments for greater control over the sector, as demonstrated through the Australian Qualifications Framework (AQF) and the role of TEQSA in the registration of providers. It was felt that this control may well be expanded to include the accreditation of courses, either through direct government intervention or through a system of cross university peer review.
- Incremental increases in technology – An increased reliance on technology, and the use of standard software across the sector (for cost if not for convenience) was felt likely to force universities into a greater range of common practices, and it would appear from the views of informants that this would include course accreditation. It is not that the universities would necessarily want a greater standardisation of procedures (indeed quite the contrary) but this is likely to be forced upon them - perhaps inadvertently - through the use of common software, particularly if this is supplied or funded by the Commonwealth Government.

A number of informants believed that negotiations were already under way between the Commonwealth Government and IEEE (Institute of Electrical and Electronics Engineers) for the use of IEEE Xplore software for an integrated student record system/course accreditation

program, to be supplied under license to Australian universities, and they referred the researcher to the IEEE Xplore website for more information.

This website states:

Once a department in a university enters program learning outcomes or recently called Student Outcomes (SO), Program Objectives (PO), [onto the system] the system applies all courses information including Course Learning Outcomes (CLO), Course Objectives (CO), and assessment policy. Then, the collected data is automatically coordinated and analyzed...., the system then provides different functions including computing the percent of attained course learning outcomes and achieved student outcomes. The system tries to integrate different educational assessments into a unified evaluation report that provides a plan for continuous improvements... .. In order to make the education procedure easier, the system builds an automated survey and a syllabus for each course. The survey and syllabus are shared among all instructors who teach the same course. ...The system helps decision makers to assess the educational process, aid any institute to accredit the performance of the university as a whole and make a decision where all data is up to date. The system shows a powerful capability in producing different reports that provide a plan to improve the quality of education for present and ready to be used in continuous improvement. (IEEE 2017)

If the software was networked across universities (as it almost certainly would be if supplied by the Commonwealth and held on a central server, based no doubt on a cloud in Canberra) an immediate comparison would be possible between universities - a move attractive to regulators but not necessarily to the institutions themselves. It would also be possible to integrate this with various levels of risk management software, (such as Logic Magic Risk Manager - <https://www.logicmanager.com/erm-software/operational-risk-management-software/education/> or Risk Wizard -<https://www.riskwizard.education/>- the latter popular with Australian higher education risk managers] with universities making the decisions but with the constant possibility of monitoring by the Commonwealth Government.

Informants felt that while the concept was interesting it was unlikely to be accepted willingly by Australian universities. It may, however, set the path for developments in the future. There are a number of similar software packages, such as Creatrix Campus [<https://www.creatrixcampus.com/higher-education/>], CoCurricula 180 [<https://www.interfolio.com/products/co-curricular180-data180/>] and G2 Crowd [<https://www.g2crowd.com/categories/higher-education-student-information-systems>] that were also mentioned by administrators and risk managers. All of these have the potential to change existing course accreditation procedures radically.

- The growth of specialised universities (or specialised units within the established universities)  
A number of informants reported that their academics felt that the current course accreditation procedures of the university were too vague and general. What these staff were seeking were more specific instructions, focused on the practices of the discipline that could at the same time meet the requirements of professional bodies. It was suggested that if further specialised universities - similar to the Australian University of Divinity, albeit not teaching Theology, but some other discipline such as Medicine, Health or Information Technology - were approved, their accreditation procedures would be far more specific to the discipline.

Most informants with whom this issue was discussed felt that their university would be opposed to more specific accreditation procedures as this could fragment the university. However, they could see the logic behind it, particularly the integration of academic practice and professional recognition.

- The greater integration of university systems – Most administrative informants expressed concern at the growing gaps between systems within the same institution, caused in many cases by incompatible software, disinterest by management looking for outcome rather than process, and by purchasing officers seeking the cheapest option at the lowest price. These gaps added to the workload and increased the risk of error. There was also concern about the gaps that were emerging between the five stages of course approval procedures, with the possibility of unauthorised amendments between the stages:

The five stages of course accreditation, with end points, are normally recognized as

- Development within the faculty (end point – approval by faculty board)
- Consideration of the initial concept (end point – approval by the relevant officers)
- Writing of the full course documentation (end point – endorsement by faculty board)
- Approval of the course (end point – approval by Academic Board)
- Mounting the course (end point – the enrolment of students and the commencement of teaching) [More detailed information is provided in Chapter 2]

Each of these stages is separate and distinct as far as both administrative action and risk management is concerned. What appears to be lacking in a number of institutions – a point noted by informants - was an integrated structure to bind each of these parts together. This structure was previously seen as a single “course accreditation procedure”, but in an era of specialised technology (and staff with the skill to apply this technology, but not to work in other areas) this unified model has started to fragment, with risks emerging in the cracks and interfaces between each stage.

Most informants felt that greater standardisation would be forced upon the sector, possibly through the pressure of governments, but few were happy about it.

## 8.12 Summary

Course accreditation is a task of increasing complexity, challenged by the demands of regulators, the need for consistency and the fact that ill-considered approvals will harm students. It is also an area of risk and change, with the growth of technology, the unreliability of systems, and the turnover of staff making the transition from the present to the future more difficult and painful. All Australian universities seem in complete agreement about what they are trying to achieve; viz – a system for ensuring that the programs provided will deliver the best outcome for students and the institution, and that these will be delivered in a relevant and timely manner at a cost the university can afford – but few can agree on the best pathway to achieve this, nor can all staff, even in the same university. If course accreditation is considered to be a purely administrative exercise, the academic community loses interest. If, on the other hand it is believed to be primarily an academic activity – with academics developing and delivering the program while administrators hover like servants or housekeepers in the background, it may well be destroyed through administrative indifference. As will be shown in the following chapter (Chapter 9) is the task of the procedures governing course accreditation to strike the most effective balance between these two.

## Chapter 9 Discussion of Refined Data

*This chapter is used to discuss the findings from the research, to provide a classification of the various systems of course accreditation and risk management used across the sector, and to determine the relationship between these and the governance structure of the institution.*

One of the difficulties in addressing the influence of risk management on course accreditation in Australian universities is the novelty of the topic, and the fact that there are few precedents for such an investigation. There are also few precedents for examining any of the inner workings of Australian universities, particularly where those engaged regard secrecy about their activities as a protection against unemployment.

### 9.1 An Initial Discussion of the Findings

The principal finding from this research is that risk forms an essential component of course accreditation in all Australian universities, even though many involved in the process may be unaware of its presence or application. To ensure that risk is appropriately controlled, all Australian providers (both universities and non-universities) have developed procedures that must be adhered to rigorously throughout the process. For this reason, it is ultimately the *procedure* that identifies and manages risk in course accreditation in Australian universities rather than the staff immediately involved.

This does not mean that those with a responsibility for assessing courses can be indifferent to their task, or that their institution feels that they lack either the competence or the enthusiasm to pursue this matter to the best of their ability. It is simply that risk management is too serious a business to be entrusted to the vagaries of human nature, and for consistency, equity and predictability, uniform policies and procedures are enforced throughout the process.

At the same time, the instructions issued by universities are intended to guide individual judgment but never to supersede it. What is prescribed must be applied in a meaningful and intelligent manner and, if this is lacking, it is questionable whether the intent of the institution will be achieved. For this reason, the procedures prescribed by Australian universities should be seen simply as the first stage of a framework within which sound judgments can be made. The procedures in themselves serve little purpose, and will achieve little outcome, unless applied in a diligent and conscientious manner.

The paradox throughout the study is that those who are unconsciously applying risk management in their daily practice are often the first to deny that they are doing so! Informant after informant suggested that they saw little relationship between course accreditation and the risk management practices in their university, despite the fact that there was every evidence through their words and deeds that the opposite was the case. The ultimate conclusion to this study rests on the realisation that an unconscious application of risk management, driven by adherence to published procedures rather than personal judgment, lies at the core of course approval in Australian universities.

#### 9.1.1 Restatement of the problem

The issue under investigation was whether risk management has had any impact on the course accreditation procedures of Australian universities. As mentioned in the opening paragraphs of Chapter 1, Australian universities have the right to self-accredit the programs of study leading to their awards, but because no standard method has been prescribed for doing this there is considerable variation in policy and practice across the sector.

This gave rise to two questions:

- Amidst this diversity, does risk management form any part of the commonalities that exist between the course accreditation procedures of Australian universities?
- If so, how is risk management applied, and how has it impacted on current procedures?

It was not easy to investigate either issue, firstly because there are few clear statements of the relationship between risk management and course accreditation in the documentation produced by Australian universities, and secondly because there appears to be considerable reluctance on the part of these institutions to allow their inner workings to be investigated.

It was possible to approach these issues by collating and comparing the course accreditation procedures of Australian universities, using as a first step the procedural documents produced by each institution, and then filling gaps and resolving uncertainties through the interview of staff. A course accreditation flowchart was prepared for each of the unrestricted universities in Australia. Then commonalities of practice and procedure across the sector were sought. The same process was followed with the risk management policies of each institution, with a search for commonalities of practice and procedure, commencing with documents in the first instance, followed by the interview of staff.

The most that a university can do is to provide a procedure, which if followed diligently will achieve the desired outcome. Risk is thoroughly considered as a part of this process, but this is orchestrated by the procedures rather than by some deliberate or conscious decision on the part of course assessors.

### 9.1.2 The environmental background

As discussed in Chapter 3, the concept of *risk* is ill defined in Australian Higher Education, with some limiting it to financial or safety concerns, while others suggest that it includes all factors – both predictable and unpredictable – that could impact upon the work of the institution, or on the sector as a whole. The position taken throughout this study has been that risk is essentially a cognitive phenomenon – a concept that rests in the mind of the individual rather than an entity that has independent existence, and which is based on an anticipation of events in the light of past experience (Section 3.1.1). This in turn means that the depth, significance or even the actuality of risk varies from one person to another and may differ within the same individual on different occasions.

Universities, as collaborative bodies, reflect the collective views of their members through a system of shared governance (Section 2.4.1.1), and this includes the perception of risk. There are two categories of risk in Australian universities (see Section 1.1.6) – those within the control of the institution and those beyond its control. The first is avoided by a careful monitoring of the situation, with remedial action as necessary, while the second – because it lies beyond the control of the university – can be covered only by the preparation of contingency plans. Provision is made for both in course accreditation procedures.

There are two approaches to the management of risk (Section 2.4.1.5) - *formal risk management*, within which anticipated risks are avoided or minimised by standard procedures, and *informal risk management* in which the avoidance of risk is made the responsibility of the individual. Thus, there are numerous instructions issued by universities to prevent the misappropriation of funds – a form of formal risk management - while at the same time (and because not every risk can be anticipated in advance) an onus is placed on individuals to be aware of potential hazards (such as the leaving of safes unlocked) and to do everything possible to avoid them, a form of informal risk management.

As mentioned in Section 2.4.1.6 the tension between formal and informal risk management can be used to explain a number of factors in course accreditation, including the attitude of Senior Management versus that of Academic Boards or that of faculties versus their corresponding

administrative support groups. It would seem that course accreditation procedures are designed to protect the institution (and hence senior management in their direction of the institution) rather than staff or students. Their implementation, on the other hand, rests with those who may have a different agenda to their superiors. This tension, in turn, gave rise to anomalies in the response of informants, (the test question being “What is the most important part of this process?”) a matter that required further investigation in the course of the study.

The statement that course accreditation procedures are designed to protect the institution rather than staff or students may appear controversial at first but would seem to be fully supported by university documentation. While these make occasional reference to “quality” and “student attributes” neither term is clearly defined, and it would appear that the intent of course accreditation – unlike the warranty for a commercial product – has little to do with consumer protection, possibly because no university can guarantee that those enrolling in its programs will receive benefit, as too much depends on the commitment of the scholar (Corones 2012). The most that universities can do is to provide a safe workplace for their staff and a secure environment for those they serve. Anything beyond this lies outside their control (Minter Ellison 2016). The purpose of the accreditation process should therefore be seen as a protection of the institution against loss (whether financial, situational or reputational) as opposed to providing any sanctuary to those within it (Narrarian & Harnisch 2018).

### **9.1.3 Undertaking the research**

As explained in Section 5.5.2, the research was conducted in two parts. In the first, the course accreditation and risk management procedures of all Australian universities were examined (almost all are readily available on institutional websites) and the gaps or uncertainties in these documents identified. In the second stage an attempt was made to fill these gaps through the personal interview of informants.

Three factors were to be checked to ensure the reliability of the data. The first was the currency, accuracy and comprehensiveness of the documents themselves. As the vast majority of course accreditation procedural documentation had been updated to meet TEQSA requirements from 1<sup>st</sup> January 2017, little discrepancy was found between what was described and what informants claimed was actually being done in their universities. Associated with this was the checking of risk management procedure. This task was harder, firstly because less information was stored in one place, and secondly because much of what was available was specific to particular areas such as Finance or Properties, and thus less relevant to the study. Despite these difficulties, it was possible to prepare a reasonably comprehensive portfolio of risk management practice across Australian universities and to compare these in turn to the course accreditation procedures of the institutions involved.

The second factor concerned the insight of informants. There were few informants who seemed familiar with the process of course accreditation from start to finish, or the various academic and administrative actions required at other stages. To counter this, the information supplied by informants was specifically limited to their area of responsibility. (Much more information was provided – once university staff start talking it is almost impossible to shut them up - but only those things with which the informant was immediately familiar were taken into account.)

The third involved the transition to new types of teaching. Most course accreditation procedural documentation appeared at first sight to be limited to traditional forms of delivery (i.e., face to face lectures in a classroom) rather than newer modes, such as self-paced electronic delivery. Where it was known that a university had embraced new forms of teaching an effort was made to see whether this was equally reflected in its course accreditation documentation. In the majority of cases it was found that this had been done, and the issue was of little consequence,

Individual questions were prepared for informants in an attempt to fill gaps or correct misunderstandings, and this enabled many uncertainties to be resolved. At the same time informants created by their response a series of key questions that needed to be addressed before the influence of risk management on course accreditation procedures could be determined.

The key factor centred on who – the person or the unit – was actually responsible for risk within a particular university. Virtually all informants had no doubts about this – it was almost always the institutional risk manager. The institutional risk manager, when cornered, almost always denied this, claiming that risk management was the responsibility of everyone, and that their task was more to provide guidance than to solve difficulties. (This was true even of those areas for which risk managers claimed formal responsibility, such as finance and internal audit. Few risk managers considered it their role to take out the green pen of financial overseers and review the ledgers themselves. This was the responsibility of subordinates – the function of the risk manager was to see that the work was done, and that it was done effectively (Informant 31). For this reason, risk managers more frequently saw themselves as advisors rather than operators – persons with a responsibility for the oversight of risk but not necessarily for its amelioration.

This in turn created a vacuum in many institutions, with staff claiming (in all sincerity) that the risk manager was responsible for all risks within the organization, a position that most risk managers vehemently denied. The only conclusion one could reach was that like a plane with two pilots (both of whom believed that the other was flying the aircraft) there was no one who was actually responsible for risk, and that most universities, like its aviation namesake, were flying solely on autopilot

## 9.2 The issues to be determined

Five significant lines of investigation needed to be undertaken before the influence of risk management on course accreditation procedures could be clarified. While each of these will be addressed in the pages that follow, a brief summary is provided below:

- The most basic and critical issue was how Australian universities actually assess proposals for new courses and subjects. (Most procedural documentation explained quite clearly *what* was done but rarely gave the reason *why* particular steps were taken). While it might have been easier to focus on the differences between universities, it was believed that the commonalities were of far greater significance and that it should be this, rather than superficial details of policy or practice, that should form the focus of the study.
- The second was the question of how proposals are checked for risk within this framework, including the types of risk that assessors look for, and the persons or office responsible for their identification
- The third was the type of risk to which universities in general are exposed, and the appetite of individual institutions to accept these risks should they occur in course proposals
- The fourth was the impact of external regulators such as TEQSA on risk management, risk avoidance and risk mitigation
- Once these issues had been resolved, the fifth - the influence of risk management on the course accreditation policies and practices of Australian universities – could be examined in some detail

### 9.2.1 How and why do Australian universities assess courses?

The response to this question depended to a large extent on the person asked, their position in the organization and their role in the course accreditation process. Most respondents appeared to have, at the most, an extremely limited view of what goes on, and while able to explain what they do personally, and (sometimes) why they do it, the vast majority seemed unfamiliar with the acts of their colleagues and, much less, with the motivation governing their actions.

The situation was not helped by the fact that there appeared to be no formal training provided in the assessment of course or subject proposals by any Australian university. It would appear to be assumed, almost universally, that once staff reach a certain level (or once appointed to a particular office within the institution) they are, or should be, inherently familiar with what constitutes a sound and viable course proposition and should be equally ready to identify any risk that such proposals might bring forward.

It seemed hardly necessary to state that this was a bold assumption on the part of the universities concerned. No one would allow a workman to repair one of the university's gargoyles without first ensuring that the person knew his trade and was fully equipped for the task – the risk is too great and the threat of incompetence is acknowledged by everyone. At the same time, it would appear that universities have no hesitation in allowing persons with unverified experience and uncertain knowledge to pass judgment on new course proposals.

The danger is by no means eased if it is argued that the collegiate nature of decision making in universities permits a sharing of knowledge and experience that irons out discrepancies. Indeed, an argument of this type simply confirms the fact that the members of these committees lack what is required in the first place and are dependent on the insight of others to overcome their inadequacies. Nor is it sufficient to say that those giving the benefit of their advice are experts in the field who can be listened to, rather than simply the loudest mouths present. Accreditation committees cover the complete spectrum of the curriculum offered by a university, and if it was essential to have an expert in every field standing by for every contingency, such a committee would potentially be of infinite size and completely unwieldy. At the same time, if a committee can operate without the benefit of specialists, why have any selection criteria at all?

If any recommendation is made as a result of this research, it would be that appropriate training be provided for all who are engaged in course assessment. The risk of default through ignorance is otherwise too great (Alstete 2007).

Course accreditation has always been conducted and has never been challenged, but what exactly is its purpose in Australian universities? The accreditation process is expensive (see Section 8.4), time consuming, and the source of disruption and frustration. It seems clear that Australian universities see value accruing from the process or it would have been discontinued long ago - well before the age of Higher Education regulation - but what exactly is gained from the procedure, and what justification do university authorities provide for its continuation?

There could be an argument based on cultural conformity ("All other universities do it, therefore if we are to be considered a bona fide university we should do the same") but this is hardly the point. The fact that no one has questioned the need for the practice while everyone engages in it suggests that what is done yields positive benefit, but what might this be?

One suggestion sometimes made by those outside the sector (but rarely by those within it) is that Australian universities have developed course accreditation procedures because they are required to do so. While this may be true of universities in other jurisdictions, particularly those where the constant internal self-evaluation of courses plays a major role in the recertification of an institution by an external regulator, there is in fact no legal requirement for Australian universities to go through

any procedure whatsoever before offering courses of study to the public, although for funding purposes it might be advisable to seek the agreement of the Department of Education and Training before commencing a completely new discipline. Despite this, a university can, if it wishes, offer any instruction, content or delivery it may choose to provide without the agreement of anyone beyond those who teach, support or receive it, although in most circumstances it would be extremely unwise to do so. *(Information supplied by a senior manager in a metropolitan university)*

For this reason, course accreditation is essentially a voluntary rather than a compulsory activity. (TEQSA does require that there be a procedure in place to assess course proposals in all self-accrediting institutions but makes no attempt to describe what this should be. Thus, if the normal practice in a university consists of nothing more than an announcement by the Vice Chancellor - without reference or prior notice to anyone else - that a new program will commence from a certain date, this is all that is needed, provided such action is consistent with the institution's standard operating procedure. In reality, of course, such simplicity is never the case, and it is doubtful that TEQSA would allow such a loose draconian system – essentially management by whim - to continue. At the same time there is nothing to compel universities to develop a course accreditation procedure – it is something done by the institution itself in the belief that it gains some value from it). *(Information provided by a senior manager in a metropolitan university)*

This, however, does not answer the question of why universities accredit courses. The next section contains possibilities suggested by informants.

### **9.3 Why do universities accredit courses?**

#### **9.3.1 Furthering the strategic aims of the institution**

This explanation was put forward by those involved in the planning aspects of university management. University planners tend to view courses - which they have no responsibility to deliver - as steps towards constructing the future, a virtual image they may have already developed through their planning propositions. According to those who hold this view, institutions have the choice of whether they will offer programs that will strengthen themselves or by inadvertence weaken it. By careful selection of the most appropriate pathway future objectives can be achieved. Course accreditation is therefore an instrument for identifying and encouraging those things that will benefit the university while filtering out those that cause damage.

The weakness of this argument lies in the fact that many of those involved in Higher Education planning are idealists who seek to deliver self-fulfilling prophecies. They have envisaged a particular outcome and are now seeking the instruments to bring it to fruition. Unfortunately, strategic objectives can only be achieved in Higher Education through the willing co-operation of others, and such a mechanistic image of course accreditation could rarely create the most favourable environment for doing so.

#### **9.3.2 Ensuring the availability and best use of resources**

This argument is sometimes put forward by those who hold a utilitarian view of the university, within which there is an expectation that higher education providers will add value but must do so in the most economic and cost efficient manner – a view sometimes taken by facilities directors and faculty managers. Thus, it is rarely a question of what the university does, or might achieve, but what it is likely to expend while doing so. (This “Scrooge approach” seems not to be the view expressed by university accountants, most of whom are more than happy to see money spent provided there is an adequate return on investment. It is a theme found mostly among those with a fixed and limited

budget who are continually being asked to do more with even less and are bending under the pressure.)

In this model, course accreditation is seen as a vehicle for the equitable distribution of resources. What is actually approved is less important than what it might cost to deliver, and the primary purpose of course accreditation is to ensure that resources are allocated to the most economic proposals.

The weakness of this argument lies in the fact that full costing is rarely possible until after a program commences. There can always be hidden and neglected costs of which the committees making decisions are completely unaware, or which they choose to disregard. To present course accreditation simply as a method for ensuring the best use of resources appears to miss the point of what the majority of universities claim to be doing.

### 9.3.3 Ensuring the financial viability of proposals

At first sight this appears to be similar to the issue raised in the preceding section but in fact approaches the issue from a completely different direction. It costs money to offer a course, and under normal circumstances this must be recovered from somewhere if the institution is to remain solvent. Many outside observers (particularly students) seem to feel that this cost is recovered through fees, but this is hardly the complete picture. Many costs in Australian universities are in fact recovered from the government, with others met by contracts, sales and commercial activities. Within this concept of course accreditation the process exists to ensure that there will be an adequate return on investment. Thus, a course may be excellent in concept and nature, but unless it can be shown as financially viable it cannot be run. The purpose of course accreditation is therefore to identify and eliminate those proposals that are unlikely to give a fair return to the institution.

While it is true that financial viability is one of the factors considered at the initial course proposal stage it is hardly the most important issue. A university may well be prepared to offer a *loss leader* (using that term in its retail marketing context) such as an Honours program, if this will bring other benefits. In addition to that, virtually all decisions on the financial viability of courses are made on an assumption and extrapolation basis. The proposed business plan may seem viable at the initial course proposal stage, but this gives no guarantee that the program will attract the number of students suggested or that other costs will remain stable. In reality, course accreditation is rarely a test of financial viability, it is simply an exercise in due diligence (using that term in its accounting context) to ensure that financial risks are fully considered.

In addition, the vast majority of Australian universities have better ways of assessing the financial viability of programs than a mere examination of course documents – a process that suggests that financial considerations are determined in isolation for each offering. (Most operating and recurrent costs are calculated on the basis of subjects rather than complete programs and are a debt against the cost centres of the faculties or departments offering them, not against a specific course - Informant 13.)

Little information is provided in the literature (the closest found was Gallagher 2003), but informants suggested that most universities use the following methods to assess financial viability when doubt exists (but as the process is time consuming, it is used only when necessary not in every case).

- A comparison is made of financial trends within existing programs of a similar type offered by the university.
- Attention is paid to what has been happening with similar programs in other institutions (in other words, are the programs of competitors continuing to attract students, have any been discontinued, are competitor costs similar, and so on?) The reliability of such an analysis is

often questioned as the information available is likely to be incomplete but it may, at least, reflect a trend.

- The financial risk appetite of the institution is considered (in other words – is the institution in a position to take a gamble on the return from this expenditure, the answer varying according to the economic circumstances of the institution).
- The non-material benefits are costed. (This is often done with Honours programs which because of the small size of classes can never be run at a profit. At the same time, the non-material benefits these programs provide, particularly if they enhance the research profile and academic reputation of the institution, may make this loss bearable.)
- The reputational costs are considered (Again, it is difficult to convert concepts of this type into cash equivalents, but there may be future gain through tolerating present losses.)

The place where this is done, however, is in the hidden recesses of the Financial Unit of a university not in a course accreditation environment. It would be a mistake, therefore, to suggest that one of the purposes of course accreditation is to assess financial viability.

#### **9.3.4 Identifying and managing potential risks**

This is one of the functions of course accreditation, but hardly the one first nominated by informants. The difficulty lies in the fact that accreditation panels are rarely empowered by their terms of reference to go beyond “advising Academic Board of their concerns”, with little if any mention of the specific term, “risks” (particularly risks that may never eventuate). This produces uncertainty on just how far these bodies should go. Most course accreditation committees or their equivalents focus on issues such as relevance, delivery and conformity with legislation rather than the risks involved in offering a course, a field in which most have little training, authority or expertise.

This does not mean that risks are ignored when noticed, but it would seem that there are few, if any committees whose primary function is to seek them out. Most informants suggested that risk identification was an incidental rather than a deliberate part of the course accreditation process, and that no penalties or punishments were imposed where risk passed unnoticed (This contrasted markedly with issues such as adherence to the Australian Qualifications Framework or the relevance of programs, where a committee that proved negligent would quickly be disbanded or replaced.)

It would seem that while risk identification lurks in the background of committee deliberations it is not seen as a primary function of the accreditation process, and that risk is avoided through procedures rather than personnel.

#### **9.3.5 Ensuring compatibility with equivalent programs elsewhere**

While this is an aspect of course accreditation it is something that few institutions seem confident about pursuing. The difficulty is lack of time, lack of opportunity, and even more a lack of insight into what others might be doing or might be planning to do in the future.

Despite this, there is every need for universities to remain competitive, and this means being able to offer programs sufficiently attractive to draw students away from competitors. Informants noted that in the vast majority of cases, Australian students selected their place of study on a convenience basis first, followed by the institution most likely to accept their ATIR score. Except for the very bright, who might gain admission anywhere, the reputation of the institution meant little at this stage. In

addition to this, as all Australian awards were meant to be equivalent under the Australian National System, the content or focus of the programs offered by individual universities were ultimately matters of indifference to applicants and their parents.

This indifference did not apply to peer institutions, the vast majority of which (at least according to informants) were quick to note the inadequacies of particular courses, often by giving minimal credit for those transferring from a defaulting university, and secondly by making disciplinary colleagues aware of all deficiencies. For this reason, all Australian universities claim to make an effort to keep their courses equivalent to (or better than) those offered elsewhere, and hence to make them acceptable to the academic community.

This in turn requires a range of expertise, and one of the purposes of course accreditation is to bring such a pool of knowledge together. While it was admitted that this knowledge was often incomplete, most academics, even if unfamiliar with the details of the programs offered by competitors, were at least aware of the success or otherwise of those who had transferred to their institution and could use this as a benchmark to evaluate the level of activity elsewhere. Course accreditation was therefore seen as a means for ensuring compatibility with the sector.

There are two difficulties with this. The first is that judgment would seem to be based on hearsay with the only positive evidence being the success of transferees (and were these the best students, and if so, why did they transfer from their previous university in the first place?) Secondly – and perhaps more seriously - even with perfect knowledge of what others might be doing, the gap between what was being offered by competitors now and what might be offered in the future appears to have been completely overlooked.

In reality, it would seem that little reference is made in course accreditation to the offerings of others and that the commonality between courses is due more to adherence to the requirements of the Australian Qualifications Framework and the expectations of professional bodies than to any type of industrial espionage. Nor is this shortfall met by external advisory committees, most of which (according to informants) are anxious to keep the university on side and make little reference to the work of competitors.

### **9.3.6 Communicating future intentions and avoiding territorial disputes**

There appeared to be little doubt on the part of informants that one of the purposes of course accreditation is to publicise intentions, and thereby reduce surprises to those who may otherwise feel aggrieved. The various committees prescribed by course accreditation procedures allow those who feel disadvantaged by a proposal to present their case and, if necessary, to have amendments made. While much may be done behind the scenes as part of the undocumented aspect of these procedures (informants noted that public clashes were rare) the fact that the information is available, and that a forum is provided for discussion and resolution, does much to ensure campus peace and stability.

Informants were asked about the means of publicity, and most indicated that, at a minimum, the titles of new award proposals were made available to the university community as early as possible, generally on a staff only website. If it was felt that what was proposed was likely to intrude on the work of others, or take away students or resources, the issue could be taken up by the Deans in private discussion. The majority of informants felt that the intramural publicity that course approval provided was a significant contributor to its success.

The mention of private discussion raises another point, however, and that is just how much of what transpires is done in public, and how much occurs in secret negotiations behind closed doors. There is little mention of private discussion in the procedural documentation - indeed it would seem to be assumed that everything that is done throughout the process occurs in public gaze (or at least in the gaze of the university) and is noted and recorded. It became obvious from the comments of

informants that this was rarely the case, and that much was done by phone, e-mail, or through chats and deals in common rooms that was not explained anywhere.

Informants played down this aspect of course accreditation by noting that everything that took place in private was informal and that the only recommendations that counted were the ones put forward by formally constituted committees. While this may be so, it was noted that would still be possible to use committees to rubber stamp decisions made elsewhere by powerful or influential people. Informants disputed this on the ground that membership of the various committees had been deliberately made broad as a preventative measure. While lobbying for votes was always a possibility, the structure of most course accreditation committees made caucus action impossible. (The structure of accreditation committees will be discussed in greater depth in Section 9.5)

### **9.3.7 Collecting administrative data, including records**

The majority of administrative informants suggested that course accreditation was essentially a data gathering exercise. Academics were needed to cull inappropriate proposals (and thereby reduce the workload) but the key point of the exercise was the collection of information that could support the subsequent administration of what was offered.

While no one suggested that data collection was the sole purpose of the process, most felt that this was a generally overlooked part of the operation, and that the opportunity presented for data collection from other sources was limited. Hence, great insistence was placed on templates and documentary accuracy. If the required information were not provided it might well be impossible to service the course.

Examples were given of a number of points that were sometimes overlooked:

- The date of commencement of a course. In most cases it is assumed that courses will commence in the first semester after approval, but this is not always the case, particularly if staffing proves difficult or if the market deems otherwise.
- The location of teaching in multi-campus institutions. The location of teaching had an enormous impact on timetables and accommodation. The fact that a course could be offered in one place did not necessarily mean that it could be offered in another
- The anticipated commencing number and attrition rate. This had an impact on five areas: Admissions; Timetables; Accommodation; Services; and Examination planning
- The anticipated number of non-standard enrolments. Non-standard enrolments (mature age entry, and so on) are disruptive and impose a heavier demand on staff. While this is normally factored into workloads on the basis of past experience, it can cause difficulties if a particular program is likely to attract a larger number of non-standard students (International students, students with disabilities, students without ATARs, etc)
- Information required by specialist services, such as learning centres, language centres, counselling or indigenous units. The lack of this information may cause an under resourcing of services, particularly when programs commence.

Informants noted that these points (which are illustrative only, not exclusive) are generally not ones that are of interest to accreditation committees or the academic community and are likely to be picked up only through the completion of templates.

Despite this, few academics – unlike administrators - seemed to feel that course accreditation was an exercise in data collection, possibly (it was suggested by informants) because the emphasis from an academic perspective is on the content and rigour of a proposal rather than on those who will study it.

Administrative staff, on the other hand, are required to cater for the needs of the institution as well as its students. It is also administrative staff who receive complaints (and are required to deal with aggressive clients) when things go wrong.

### **9.3.8 Satisfying the requirements of external regulators**

It was occasionally suggested that this was the main, if not the only reason, why modern universities accredited courses. Much that occurs in a university is done in private and these things are essentially unaccountable. Thus, few can question the decisions made by small groups in closed sessions unless there is clear evidence of procedural unfairness. In theory there is no reason why course accreditation could not be handled in a similar manner, with the only announcement being the fact that particular proposals have been approved, and that students would enrol on a certain date.

Despite this, course accreditation is essentially a public process (public at least to those within the institution if not outside) while the other procedures mentioned – such as meetings of examinations committees or promotions panels - are not. Why is this so? It was noted by informants that most of the procedures internal to a university are of no concern to outsiders. Thus, the manner in which marks are scaled, the criteria used for promotion, or the reasons for restructure, have no relevance or value beyond the institution. Details that would breach privacy must always remain confidential, but it is the procedures themselves that are under consideration here. Why is it that every attempt is made to publicise course accreditation but to keep almost everything else that goes on around it concealed?

Those informants who maintained this view suggested that course accreditation was done essentially to justify the university in the eyes of external regulators. It would be completely legal and legitimate for universities to make decisions on the courses they offer behind closed doors without reference to anyone either inside or outside the institution - indeed this is part of the autonomy gifted to the Higher Education sector by law makers and legislators. Australian universities have chosen not to do this, however, to convince regulators of their commitment to quality.

At the same time, there appears to be no evidence from TEQSA or elsewhere that such a demonstration is needed. TEQSA expects procedures to be in place but does not demand that they be conducted so openly for the purposes of verification. The argument, therefore, that course accreditation lingers as a historic relic now retained solely for the purpose of satisfying regulators (with all real decisions made in advance and in private) appears very hollow.

### **9.3.9 Maintaining the confidence of the public and stakeholders**

The final suggestion made was that universities accredited courses to maintain the confidence of the public and other stakeholders. As mentioned previously, there is nothing to stop all decisions being made privately without appeal or publicity, with the only indication of approval being a notification that particular courses would commence in the near future. Such a draconian mode of proceeding would be unsatisfactory for those within the university, and completely unacceptable to those outside, who might well consider these approvals based on whim or favouritism rather than merit. Thus, the strength of proposals needs to be publicly tested, and it is for this reason that universities accredit their courses so publicly.

While all of the above are believed relevant, it is felt that the answer that comes closest to the truth is the final one, as instruments exist to handle all of the others without the need for a cumbersome procedure. By making the process public and multi-faceted universities try to maintain the confidence of those beyond the institution as well as those inside it.

## 9.4 How are courses assessed by Australian universities?

It was difficult to gain answers to this question, even from those immediately involved in the approval process. The majority with this responsibility were certain that their decisions were correct but found it extremely difficult to explain how they were derived. The following subsections are a synthesis of the answers received.

### 9.4.1 By comparing proposals to similar offerings elsewhere

This was the most common answer, and it would seem that the vast majority of course and subject proposals are assessed on this basis. There are a number of weaknesses in this method of assessment:

- There is an assumption of perfect knowledge which in reality is impossible to attain. The range of courses and subjects on offer across the sector is enormous, and the most that can be done is to take one or two examples believed relevant and to compare the proposed course or subject against them. This assumes that these examples are in fact typical of all others, and that they are truly representative of best practice in the discipline.
- The alternative is to construct an ideal course in the assessor's mind against which new proposal can be compared. This is limited by the assessor's knowledge and experience and, may in fact, be subject to personal preference and bias.
- There are no objective criteria against which proposals can be assessed. Observers of programs offered elsewhere are likely to note only those things that seem most relevant at the time while not being aware of equally important factors that may remain hidden.
- There is no guarantee that the items in an assessor's memory are currently being taught, particularly at a time of rapid change in a discipline. Worse still, even if they are still being taught there is no guarantee that they will continue to be offered by the time that a similar point is reached in a new course. (A third year subject may not be taught until four years have elapsed from the point where the proposal was approved— much may have changed in that time.)
- Even if there is perfect knowledge of all courses offered across the sector, none of which would undergo any future change, with the proposal being an exemplar of everything that might be desired, the ultimate outcome will simply be a replication of what exists at the moment without innovation or improvement. This is rarely satisfactory in a dynamic world of competition and changing demand.

While many claim that they assess proposals against what currently exists elsewhere - and no doubt seek to strike a mean average between the best and the worst if this is possible - it seems highly improbable that such a method will deliver the best results.

### 9.4.2 By determining the needs of students and the community against the ability of the institution to satisfy these needs

This is an assessment by virtue of the graduate attributes inherent in each course proposal. Those making the decision consider first what the community wants or needs - although their method for doing so is sometimes obscure - and then proceed to see whether this can be done through the "object" (either course or subject) proposed.

There are three weaknesses in this form of assessment:

- It is never easy to learn what the community wants or expects, and whether one is listening to the voice of the community as a whole or simply the loudest or most recent mouth.
- The community as such is rarely defined, and can include potential students, or more commonly the parents of students, the local neighbourhood, or the requirements of potential employers. (The community can also be the academic community rather than those outside its walls.)
- There are few reliable instruments to measure the wishes of the community (however this group is defined). Extra mural surveys are extremely rare and invariably those suggesting this form of assessment tend to provide their own interpretation of what is expected.

A number of informants disputed the last point, noting the mass of data available to those engaged in university marketing analysis. The difficulty with all of this - even if it is assumed that everything is complete and absolutely reliable - is that the data reflects the past and the present, rather than the future. Thus, what is in demand at the moment may not be what is needed when the first graduate emerges, perhaps in four to five years' time.

The alternative is to fall back on a pool of generic graduate attributes. All universities want students to be honest, reliable, mature, diligent, courteous, able to work alone or in teams, willing to solve problems by making the best use of professional skills through the exercise of sound judgment, and so on, but there is a vast difference between proclaiming such high ideals and delivering them in the classroom, much less in testing whether they will continue throughout the graduate's lifespan.

For this reason, an assessment based solely on an assessor's interpretation of the needs of the community (however gained, or however composed) is badly flawed. It may well be important to consider the needs and wishes of the many communities serviced by a university, but this cannot be the sole basis for a decision.

#### **9.4.3 By an analysis of commercial viability, thus ensuring the effective use of money**

This is a mercenary position but not unrealistic in a modern cash strapped university. In this approach to assessment it is the commercial viability of a proposal that is important, followed closely by a university's ability to maintain its support throughout the life of the program.

This does not mean that anything is likely to be approved provided it is cheap – indeed, quite the contrary as a substandard program may be far more costly and vastly more damaging in the long term - but it does mean that if funds or resources are restricted it may be the cheaper option (or the one that places less demand on the institution) that is given precedence.

Does this mean programs of obvious quality and demonstrated demand could be rejected – or at least sent back for revision - on purely economic (or other non-academic) grounds? A number of informants pointed out that the mere fact that a university had approved a proposal might raise expectations but at the same time did not compel the institution to enrol students or commence teaching. (Examples were given in almost every university of courses that had been approved – often at considerable cost – but for one reason or another had never been offered. This had nothing to do with the quality of the proposal - it was simply that the university felt that it might be inappropriate to commence the course in question at that particular stage. This did not mean that the proposal was rejected. It was simply that its commencement was deferred until it was forgotten. (Most Australian universities allow a maximum of two years between approval and commencement – anything more and the proposal must be reaccredited)

For this reason, the analysis of financial viability was an important part of the approvals process, taking place first at the initial course proposal stage and then again immediately before advertising the course and recruiting students. The decision was one for management, however, not Academic Boards

or their course accreditation committees. (Academic Boards and their committees have little interest in, and virtually no control over, non-academic matters – a point rarely made clear in course accreditation documentation.)

#### **9.4.4 By seeking the views of relevant stakeholders within and outside the university**

This is another way in which Australian universities assess courses. There are five ways in which this may be done, more than one of which can be used at any one time:

- The views of internal stakeholders (which ultimately includes all members of staff) may be sought through posting a summary of the proposal on a staff website, with respondents free to submit written objections, suggestions, and so on, through their Dean
- The university may request advice or comment from selected staff or units (such as the International Office, Student Counselling, and so on), particularly where an issue is uncertain or where it breaks new ground. This is generally done well in advance of the meeting where the item is to be discussed, with the comment from the group being included among the papers. This also avoids the need to involve everyone on campus – a problem when submissions are placed on websites – and reduces tension between individuals
- The university may seek advice from a pool of retired experts (who may or may not be former staff members, and who may or may not have been involved with the actual discipline during their career). The advice received in this manner – which may be individual or collective
- and is not binding on the university in any way - would normally be added to the papers when the proposal comes forward for consideration. This is not always practical owing to the short time usually available for reading proposals before an accreditation meeting
- The university may seek the advice of external consultants, particularly where the discipline is complex (Medicine), subject to change (IT and Computing) or where the institution believes external advice to be desirable (such as where new modes of delivery, new forms of assessment, and so on, are proposed). This advice may be costly as consultants charge for their service, and may also be subject to delay, and for this reason its use is exceptional rather than the norm. Despite this, the use of paid external consultants who can offer “endorsement” to a proposal appears to be growing in many universities.
- The university may seek the advice of a formally constituted course advisory committee. These committees may include representatives from industry, potential employers, professional bodies, regulatory authorities, and so on, and while their advice might be seriously considered it would never be regarded as binding by the university.

Informants’ views on the value of internal or external feedback varied greatly. To some the process was time consuming and contributed little, as the comments made were purely advisory and could be completely disregarded by decision makers. Others noted that often little response was received, possibly due to a lack of interest, and that much of what was provided came too late for consideration at meetings. In either case the advice provided rarely affected the decision to approve or decline a proposal although it might cause some minor modification to structure or content. While the intent behind seeking advice from as many sources as possible – both within and outside the university - was praiseworthy, most informants seemed to believe that it was a vast amount of work for little gain.

#### **9.4.5 By ensuring compliance with external and internal requirements**

This is a matter that is normally done as a matter of routine, involving an evaluation of course proposals against:

- The Australian Qualifications Framework (AQF)
- Relevant ESOS legislation
- Relevant health and safety requirements
- Anti-discrimination legislation
- Other relevant legislation (sometimes discipline specific)
- The requirements of registration authorities
- The expectations of professional bodies
- The views of the public and community

In addition to these external requirements, almost all universities require a check as early as possible (often at a faculty level before the proposal goes to the university at large) to ensure that the program conforms to all policies of the university, especially the course structure policy, the admissions policy, the English language policy and the nomenclature policy.

In many cases, these checks are increasingly made by compliance officers, assisted where necessary by the institution's legal unit, although practices vary greatly from one institution to another, as does the point at which these checks are made. Many universities prefer to wait until the final documentation has been prepared before a wider circle is involved as the initial course material is often too vague or general for the identification of difficulties. These checks may also be conducted by the course accreditation committee when a proposal is considered, but because of their time consuming nature they are more frequently handled by specialists in advance of meetings as part of the course accreditation procedure (together with sign offs by the library, IT, and so on).

There appears to be little formal assessment of risk in this matter, other than perhaps the danger of loss of income through program unviability, the risk of inadequacy (where the university may feel itself incapable of delivering or sustaining the proposal) or the risk to reputation through offering courses deemed inappropriate for a university, all of which are normally addressed at the initial course proposal stage.

It is the practice of a number of universities to seek comment from Teaching and Learning staff – the title of this unit varies from one institution to another - or to at least provide information to this body as part of the advanced warning preceding new proposals. These persons have no right of veto - they cannot prevent a course from going ahead - but can (and generally do) offer advice if necessary.

One other factor that Australian universities appear to be becoming increasingly aware of is the risk of inadvertently offending the sensitivities of particular groups, although the procedure to avoid this varies greatly. In certain cases, this responsibility is left in the hands of the Student Services unit (particularly where gender and similar issues are involved) or to the Indigenous Unit, or the "New Arrivals Support Unit" particularly where Islamic students are concerned, although there appears to be little consistency across the sector. The advice of other groups (church bodies, ethics committees, and so on) may also be requested depending on the circumstances.

#### **9.4.6 By examining the expected outcome against the strategic aims of the institution**

This is less easily done than the processes listed above and would appear to be both subjective and essentially negative in approach. Those assessing courses are normally aware of the strategic aims of the institution and are asked to seek further advice on anything that is obviously out of step with the current course portfolio. While courses that appear to be inimical to the strategic aims of the institution may be sent back for revision, everything else is likely to be accepted.

#### **9.4.7 By assessing the innovative nature of each proposal**

The vast majority of universities are anxious not to be seen to be simply replicating the courses of competitors, and for this reason generally seek some new approach, even in their most basic preparatory programs. For this reason, if a choice has to be made in view of a shortage of funds or resources, with all other things being equal, preference is normally given to proposals that are different – but not radically different – from those offered elsewhere. This is particularly the case where a competitive alternative is available in the metropolitan area.

It would be a mistake, on the other hand, to assume that courses are declined or accepted simply on the basis of their innovative nature. The proposal must be sound on other grounds, with innovation being simply the means to distinguish the course from one provider from that of another, often in its philosophy or pedagogic approach.

#### **9.4.8 By confirming the benefits to students and staff (including the potential for research)**

This is a further test to distinguish between competing programs rather than a core item. Course accreditation committees (and behind them Academic Boards) seem particularly interested in the benefit that is likely to be provided to students and staff as distinct from any reward to the university itself. Again, this test is applied in a rather negative manner in most universities. If a proposal offers benefits – and this can be confirmed from the document - the issue seems to pass unnoticed. It is only where a program appears to offer few benefits that questions are raised.

While all of the above are relevant, the most appropriate answer (or at least the most frequent response from informants) would appear to be 9.4.5 - ensuring compliance, with 9.4.6 - balancing the outcome against the aims of the institution, and 9.4.1 – by comparing proposals to similar offerings elsewhere, with 9.4.2 - resource availability, a reasonable second.

### **9.5 Who is engaged in this assessment?**

Course accreditation is a joint activity that involves groups from many parts of a university, each of which makes its own contribution. These groups are described in the following subsections.

#### **9.5.1 Senior officers of the university**

Senior officers are normally involved in the initial course proposal stage. Informants suggested that these staff are particularly interested in three things:

- Maintenance of the university's reputation
- Avoidance of anything that might weaken the existing course portfolio (such as duplication of programs)
- Financial and resource implications.

As a general rule the senior managers are not interested in the fine detail and are likely to spend little time on individual proposals.

### **9.5.2 Experts in the discipline area**

Experts in the discipline area are first involved at a faculty level where they undertake a peer review of course and subject proposals before they go to faculty board. This is done internally, and possibly informally. It is unlikely that faculty boards will endorse a proposal, however, without the support of those familiar with the discipline.

Other experts - generally from outside the institution - may be consulted at later stages, particularly if there is uncertainty about the currency, utility or relevance of what is proposed.

Experts in the discipline are normally expected to report on:

- The content – particularly whether it reflects the latest knowledge
- The rigour of assessment
- The mode of delivery
- The experience of other universities

As a general rule, academic specialists are not required to comment on the need and demand for the course, the employability of graduates or the benefits for students, (possibly because of their personal enthusiasm for what is likely to be offered), nor are they expected to comment on the availability of resources or issues of accommodation and staffing. Their focus is purely on the proposal from a disciplinary perspective.

### **9.5.3 Those directly involved with the development and delivery of the program**

Course accreditation is essentially a two way process between course developers and the accreditation system, with the possibility of numerous changes along the way to make proposals acceptable. Included within this discussion are those who will actually teach (or at least coordinate) the course if these are not the actual developers.

In addition to the written documentation informants suggested that those involved in the development of a course would be expected to provide:

- Additional information as required
- An identification of anticipated difficulties in mounting or delivering the course
- Confirmation of claims made in the documentation
- Evidence of the research – both academic and operational - underlying the proposal

For obvious reasons those involved in the development of courses have no say in their approval, although this may not apply to those required to teach or service the proposal.

### **9.5.4 Representatives of the academic community (but not necessarily experts in the discipline area)**

Representatives of the academic community are ultimately responsible for the maintenance of public confidence in the institution, and normally make little comment on the disciplinary aspects of a proposal but may say a great deal about its impact on the reputation of the university. Normally these representatives have five broad responsibilities:

- Maintenance of standards to protect the reputation of the institution

- Protection of students from injustice (as caused for example through an excessive workload, over-zealous assessment or a crowded curriculum). While many of these factors vary with the discipline, the demand of professional bodies, or the limited duration of programs there are sufficient commonalities with student difficulties in other parts of the institution to enable comparisons to be made and injustices removed.
- Protection of the rights of the academic community, virtually in an industrial sense, as exploitation or erosion in one area can quickly spread to another.
- Protection of equipment and facilities. (As a general rule those teaching subjects are responsible for student harm to equipment or premises, even if they are not required to pay for repairs themselves, and anything that could promote damage to property - such as the careless use of laboratory facilities or the abuse of computer workstations - is best identified by those with past experience.)
- Protection of future interests. (Academic representatives are not indifferent to their personal advancement or the future of their colleagues. This in turn may involve protection of the faculty – particularly this is not the body offering the course – or a guarding of resources.)

#### **9.5.5 Relevant administrative and professional staff**

The role of these persons requires little explanation although the power and influence that they can exert appears to vary from one institution to another.

As a general rule (and unless official members of a committee) their role is purely advisory although whether they have the right to initiate discussion, or simply respond when (and only if) asked varies considerably.

Traditionally, input is sought from five areas:

- The library
- The IT division
- Facilities management (the availability of accommodation, and timetables)
- Student Administration
- Student Services (particularly the Counselling or Disabilities Unit)

As groups such as the International Office, the Indigenous Unit or the Teaching and Learning Unit are normally ex officio members of committees they are not listed above.

It was noted that the contribution of these staff may be requested at different stages and that the information provided may go to different destinations. In the case of Facilities Management (and to a lesser extent Student Administration) most enquiries are made by the faculty. In the case of the library, IT and Student Services a final sign off may be required by the courses accreditation committee before a recommendation is made to Academic Board.

#### **9.5.6 Committees or teams containing elements from all of the above**

The use of teams enables a sharing of ideas and avoids the need to consult separate individuals. As a general rule, the six teams involved in course accreditation (all of which may be known by different names according to the institution) are the Faculty Board, the Vice Chancellor's Advisory Committee, the Teaching and Learning Committee, the Course Accreditation Committee, the Administrative Services Committee and Academic Board. The role of each is as follows:

- Faculty Board – Responsible for endorsement of proposals from a faculty perspective, normally with an internal responsibility for feasibility and the elimination of inappropriate proposals. There may be considerable input from administrators (such as the Faculty Manager) as well as academics at this stage.
- The Vice Chancellor’s Advisory Committee – Responsible for advising the Vice Chancellor (and, through the Vice Chancellor, the other members of senior management) on issues affecting the running of the university. As far as course accreditation is concerned their primary role is to endorse the initial stage of course proposals. In the majority of universities the faculty deans are members of this group (although their rights and responsibilities vary from one institution to another and in some cases these staff members may be represented by the DVC Academic).
- The Teaching and Learning Committee - Responsible for the delivery of courses. In most universities this group becomes involved after the initial concept has been approved, and acts as a guide (if required) to those developing the final course documentation. The committee may also monitor the predicted impact of the new course on the university and its students. There is usually a member of the Vice Chancellor’s Advisory Committee on the Teaching and Learning Committee.
- The Course Accreditation Committee – This body examines the final course documentation with a view to assessing the academic aspects of the proposal before making a recommendation to Academic Board. There is normally a member of the Teaching and Learning Committee on the Course Accreditation Committee.
- The Administrative Services Committee – This group examines the administrative aspects of new courses, sometimes allocating roles and administrative responsibilities, or alerting others to these requirements. The group becomes extremely important if some new aspect of administration is involved, as might occur, for example, with short courses and non-award programs, or where course proposals do not fit smoothly with existing structures.

The Administrative Services Committee is essentially an operations group that has no power to veto or defer course proposals as they flow through the system although its deliberations may affect progress through unnecessary delay. The purpose of the group is to identify difficulties in the current and future administration of programs and to ensure that these are resolved. As an operations group, the Administrative Services Group is rarely mentioned in course procedural documents and tends to function without recognition behind the scenes in most universities.

The Administrative Services Committee (which may be known by a variety of names and have a variety of roles depending on the institution) normally contains a member of the Courses Accreditation Committee, who may also be the person responsible for the shepherding of proposals through the system.

- Academic Board – In most universities Academic Board holds a delegated authority from the University Council to approve new course proposals. (Where this authority has not been fully extended it is the University Council that *approves* new courses on the recommendation of Academic Board). Academic Board normally includes the Chair of the Courses Accreditation Committee.

Course accreditation is essentially a collegiate activity in Australian universities, with few seeing the process through from its source to final approval. The fact that each of these bodies contains a person from the previous group gives limited continuity and ensures a smooth transition from one group to its successor.

### 9.5.7 What are these people (or office holders) seeking to achieve from the process?

While it would be irresponsible to draw major conclusions from a small number of respondents, there appear to be a number of commonalities in the response of informants, particularly when asked to attribute motives to others rather than themselves. These included:

- Aggrandisement of the university and maintenance of its reputation - Most informants expressed the view that those assessing courses did so for the benefit of the university, A university, like a ship at sea, tends to drown its entire crew when it goes down and hence must be kept afloat at all cost. A static maintenance of reputation is rarely enough, however, particularly where competitors are improving their image at the same time and, for this reason, constant melioration is essential.

From this perspective, course accreditation is primarily a means for enhancing the good name of the university. This enhancement is done by ensuring that courses and subjects are of an appropriate standard and relevance (and hence of benefit to students) but the principal beneficiary is the university. The key word used to summarise this is “Quality”, but it is the quality of the institution that informants have in mind rather than the quality of courses. Course accreditation is seen as yet another way of enhancing a university’s reputation, rather than being an activity in its own right. This position is more likely to be taken by those more remote from the accreditation process, particularly Directors of Quality (most of whom are not immediately engaged in course accreditation)

- Benefits for students and staff – This is a claim made by staff who are more directly engaged in the process. The outcome these people are seeking varies greatly but can be summarised as some greater benefit for students and staff than they might have had if not involved with the program.

Nor is this restricted to academic benefits. Those advocating this motive often pointed to less tangible outcomes, such as an improved attitude, better employability, stronger moral values, or a commitment to life-long learning. One difficulty involved the question of how these benefits – which existed solely as potential outcomes in course documentation – could be tested when proposals were brought forward for examination. Most informants suggested that this was done by analogy with existing courses both at the university concerned and elsewhere. If a course followed a similar model or philosophy to one with which the university was satisfied it was generally believed that outcomes would be similar, even if the content or discipline was significantly different.

This is a subjective and dubious means for assessing outcome and benefit, particularly in a fast changing academic and employment environment. The concept was laudatory, but its application may be uncertain.

- Compliance with the requirements of regulators - A surprising number of informants suggested that one of the motives that drove course assessors was the need to show themselves (and hence their institution) to be compliant with the requirements of regulators. This may not be the primary motive and might even be a temporary phenomenon in view of the rise of TEQSA, but it was suggested too frequently to be ignored. Despite this, more than one suggested that the need to comply with the requirements of regulators had always existed, even if the regulators had been other universities, with control exerted through peer pressure rather than by agents of the government.

Informants suggested that there were certain things that were expected in higher education programs, not so much the content (which varied with the discipline and level) but in the

approach of the student to study, the rigour of assessment and the application of the knowledge gained by the student to new situations. Thus, there appeared to be some common denominator – which could never be clearly defined - that distinguished higher education from all other forms of adult learning, such as vocational training or lifestyle extension. One of the motives that drove course examiners was the need to ensure that everything that passed through their hands met this expectation, whether required by regulators or not.

Compliance with the needs of regulators also involves acceptance of one's deeds by peers. If poor decisions are made the standing of those who made them is reduced, and this in turn impacts on one's professional (and often personal) reputation. For this reason, the requirements of regulators – even if these are not formally appointed to this role – remains a factor driving the actions of course assessors.

- Competitive advantage in the marketplace – Higher Education is a competitive business in Australia where much time and effort are given to the recruitment (and even more the retention) of students. Informants suggested that it was for this reason that one of the motives driving course examiners was the need for the university to remain competitive against rivals, particularly those who were drawing from the same pool of students.

The majority of informants suggested that it was not the quality of courses that made a university attractive to new students (many of whom valued the convenience of transport over the content of programs) but the reputation of the institution as a whole. For this reason, it was insufficient for those assessing courses to concentrate on the internal aspects of a proposal, but rather they were required to see each new course within the context of where the university was at the present time, and where it hoped to be in the future. This did not imply that content could be disregarded, but it did mean that the environment, as well as the course itself, had to be made attractive to students. For this reason, competitive advantage had to be one of the motivations that drove course assessors.

- Prudent course portfolio improvement – Informants suggested that it was possible for a university to have too many courses, a factor that increased the workload by reducing economies of scale, and which ultimately lead to confusion by students and the public, particularly if students in different awards are taught in the same class. One factor motivating course assessors was therefore a need to control unnecessary expansion, particularly if this absorbed resources and threatened existing programs. Prudent course portfolio planning normally took place at the initial concept stage and was continued throughout the life of the course. The fact that this issue was first addressed at the initial concept stage (generally at a Vice Chancellor's advisory committee or equivalent) did not remove the responsibility of those further down the chain, with each group being responsible for ensuring that what was passed forward did in fact improve the course portfolio of the university
- Opportunities for personal advancement and research Course assessors are human beings and exposed to the hopes and ambitions that are a normal feature of humanity. As such it is hardly surprising that informants suggested that another of the factors that motivates those with a responsibility for courses was the personal benefit that a course proposal might bring.

This was rarely a direct benefit – indeed the gain of a personal benefit on the part of a course assessor would rightly be seen as a conflict of interest – but as poor decision making leads to a lowering of status, sound decision making leads to an increase in standing and provides many indirect benefits to those making such decisions. The possibility of gaining benefit in this manner must always be taken into account when assessing the motivation of those examining courses.

It proved extremely difficult to have informants describe their personal motivation when it comes to course accreditation. Most informants were far happier ascribing motives to colleagues rather than themselves, and much of the information above is a synthesis based on what informants believed others were seeking when it came to course accreditation.

Although this suggests a second hand perspective, the question of motivation remains important. Course assessors are subject to all the fallacies and failings of humanity. If more can be learned about *why* they choose to be engaged in the process (and what they hope to get out of it) even if their involvement is unwilling – where an office holder is an ex officio member of a committee whether they want this or not - the thinking behind the implementation of course accreditation procedures may become more distinct.

### **9.5.8 Is course accreditation essentially an academic, a student welfare, or an administrative activity?**

This is an important question, as the answer shapes the view of the purpose of course accreditation and the risks and procedures behind it. A range of responses were given:

- It is an academic exercise to ensure the maintenance of standards and reputation – from this perspective, course accreditation is essentially a peer assessment to ensure that academic standards are met. Thus, the emphasis is on compliance, a comparison with the outcomes achieved elsewhere in the discipline, and on the benefits the course may bring to students and the academic community. The maintenance of records (and other administrative support) is a secondary activity that may be needed but in the end is nothing more than a reflection of decisions made on academic grounds.

This view was occasionally expressed by academic informants who felt that the ultimate purpose of the accreditation process was the maintenance of quality – with quality in this sense meaning academic integrity. Thus, a proposal may be unviable, it may be unteachable, it may be most unattractive to students, but it remains sound provided its contents and focus are acceptable to the profession. It is suggested with respect that this may be an over narrow interpretation of the intent behind the process

- It is an administrative activity intended to facilitate the collection of data – from this perspective, course accreditation is essentially an exercise in data collection. There are certain things that must be known before a program can be offered. This includes the content, the admission requirements, the location of teaching, the assessment and the requirements for graduation, to enable this information can be recorded accurately on appropriate record systems. Within this point of view, course accreditation is a vehicle to gain this information in a uniform, timely and standard manner. The process is essentially one of templates and formats, with quality resting in the diligence and care with which this information is provided. This does not mean that the content, rigour, or assessment is diminished in any way. All are important, but only because they form part of the data necessary to mount and sustain the program. It is also essential that proposals be compared to those offered elsewhere, not to assess the relevance of components, but to ensure that similar standards of record keeping are maintained.

While it might be suggested that this is essentially an administrative perspective it is rarely the general view of administrators, for whom information rather than data is required. Data – the hard sets of computer recorded facts and figures that can be produced and processed for the guidance of the institution - are essentially the prerogative of planners and senior managers, who have less interest in what may be going on in classrooms, but who are accountable for answering the questions raised by the Federal Government and by University Councils. In this view, the ultimate purpose of course accreditation is to harvest the course material for information via data mining

- It is a task whose ultimate purpose is to support the welfare of students – This is a position taken (as might be expected) largely by those with a responsibility for student welfare, whose interest is not in the content of a course as such, but more in the effect that the study of that course is likely to have on the attitudes and behaviour of those who take it. The purpose of course accreditation is not to look at the structure or content of each proposal in fine detail, but to consider just what effect the program is likely to have on graduates. It might be suggested that this is ultimately a form of assessment by graduate attributes, but this would be over simplistic, as the graduate attributes of most universities are internal rather than external. (Thus, while the skills of patience, teamwork, diligence and life-long learning may be important, as are the technical requirements of the discipline, it is external skill, such as the ability to shape changing circumstances, to gain and retain employment, and to have a sound judgment in dealing with others that is the ultimate purpose of Higher Education.)

In this model the intent of a course – quite irrespective of the discipline - should be seen as the production of well-rounded individuals – at peace with themselves as well as each other - rather than simply highly qualified technocrats, bureaucrats or ideologists, using the model first proposed by Schurman at Cornell University (Dennis 2002).

There are, however, more practical aspects than this, more specifically the avoidance of pressure on students through an excessive workload, inappropriate assessment or subtle forms of discrimination. The task is not to remove the burden of study – this may not always be possible – but to at least make it reasonable and equitable.

This is essentially a student focused view of course assessment, based largely on how the student experience should be shaped rather than what a course should contain

- It is an exercise in managerial control, intended to avoid internal dissention while at the same time making best use of the skills and resources available to the institution – This is not an explanation provided by senior management but rather one from further down the chain, where staff tend to be more cynical (or perhaps more open about their cynicism) than they are at the top. Essentially this perspective views course accreditation as means of control, a vehicle through which senior management can reduce tension within the academy by encouraging the myth that all decisions are collegiate and equitable, while at the same time shaping the environment within which decisions were made to achieve a desired outcome. In essence, course accreditation – at least within this view - forms only a small part of a wider conspiracy, a “new world order” within which institutional leaders gain more work (and less disruption) from staff by allowing them to think that they have considerable autonomy, while in reality everything they do is tightly regulated by the procedural envelope within which they operate, a concept far wider than Higher Education. (Ferguson 2017).

It is easy to dismiss this as far-fetched – a product of disillusion and frustration that deserves no further mention. At the same time there was every indication from informants that such a view was possible, and that it could have a serious impact on risk management as well as the approval of courses.

Informants suggested that one of the difficulties faced by universities is that virtually all of the skills required for its operation are intellectual, and unless carefully documented – and the documentation would need to be extremely detailed - are confined to the mind of the individual. Nor was replacement easy. If those who have developed these skills choose to withhold (or worse, to make only selective or partial use of them in their service to the university) there is little that can be done in the way of compulsion. Hence, senior management finds it necessary to do everything possible to ensure that the tasks on which it is dependent are provided willingly.

This is done by making it appear that those contributing services are doing so on behalf of their peers. (Perhaps previously on behalf of the university as well, but informants suggested that the age of appealing to one's loyalty of the institution may well be over.) This peer loyalty is enhanced by emphasising the collective and collaborative aspects of institutional activity, with decisions – perhaps even unfavourable decisions – being made in a collegiate manner with an input from as many persons as possible. Thus, course accreditation normally involves a far greater input than what might otherwise be required to make a decision on the merits of a course. The aim is to allow many voices to be heard so that the ultimate decision appears to be that of the group, never that of their superior.

Control, on the other hand, is exercised through management of the agenda and the ability to offer or withhold resources. Thus, it is the university that sets the pattern of its programs, determines the procedure for their approval, and ultimately agrees to commence teaching, not the course developer or even the faculty. At the same time, it is important that this not be done too openly lest it frighten staff away. Hence, course accreditation is one of the “invisible controls” used by a university. Under this system of management, it is made to appear that decisions are the popular choice of staff. In reality the response given is that determined by the manipulative –and essentially unseen – hand of management. (Watson 2000).

This does not mean that course accreditation is an exercise in deception, or that these procedures should be seen as either illegal or unethical. Senior management is seeking a similar outcome to that expected by the rest of the university, and as a general rule the staff of the institution – should they perceive this stratagem at work (and its implications are far wider than course accreditation) – are rarely averse to it (Weiherl & Frost 2016).

Others commented on the role of course accreditation in achieving institutional unity as a further extension of strategy. Course accreditation is one of the few areas of that requires the total cooperation of staff from all areas, both academic and administrative. Informants noted that if all areas of staff are unable or unwilling to work harmoniously with each other, the course accreditation process would be immediately unworkable. While this not the only area in which a similar co-operation is needed, it is the one in which any friction between groups will become apparent immediately, rather than something that emerges with the passage of time. As an instrument requiring co-operation from all parties it remains an effective means of control that prevents any one group becoming dominant. (Cattell 1913/2017)

- Course accreditation is a process to ensure that strategic aims and objectives can be achieved - While the statement may well be true it may seem strange to mention it in a section dealing with the question of whether course accreditation should be seen as an academic or an administrative function. However, a number of informants said that they believed that it was neither, and that ultimately both the academic and the administrative contribution are subservient to a greater risk and purpose. This may seem counter-intuitive, as without effective academic and administrative input, course accreditation cannot proceed. A moment's thought, on the other hand, may show the truth of this statement, particularly if one moves away from the immediate object of attention, the proposal itself, to the fears of those who support it. Course accreditation is essentially a process of peer review with harsh penalties for failure. From an academic standpoint the subject of the review is ultimately the course developer, with the course proposal simply serving as a means for making an appropriate judgment. If a course is below par what does that tell colleagues about the person who developed it or the Dean who signed it off? From an administrative perspective the review is of the operator – the person or persons responsible for what is done behind the scenes – who with their academic colleagues place their reputation on the line, as failure in either case is likely to be noticed immediately and publicly. Worse, course accreditation is a multi-stage process, where inadequacy at any point is likely to

impact on each following stage. This makes it extremely difficult to conceal failure. (Courses can be sent back for amendment, and may eventually be approved, but the stigma that there was something wrong in the first place can rarely be removed). Thus, it is not the strategic aims of the institution that are at stake here (although these should never be forgotten) but rather the aims and objectives of those more immediately involved, as these can be advanced or retarded through meeting the challenge presented by the course accreditation process.

In this view, course accreditation is essentially an arena in which individuals can prove their fitness for their current role and their potential for the future. Thus, it is not a matter of whether the process is intended to serve academic or administrative ends – indeed such a question becomes meaningless – but whether the successful approval of a course can justify each person's fitness for the position held in the institution (Remmers 1950)

- It is none of the above and is something else entirely - Perhaps this is the most appropriate answer as while each of the others may be true from a particular informant's perspective, none are complete in themselves. Course accreditation should be seen as a joint academic, administrative and welfare activity rather than a separate series of disconnected operations, despite the fact that each stage may be the responsibility of a different person or office. It is strongly suspected that one of the reasons that course accreditation is viewed in so many different ways may be due to the fact that participants see only a part of the operation (normally the part to which they contribute themselves) rather than the work as a whole.

#### **9.5.9 What role, if any, does, or should, risk management play in course accreditation?**

This is a difficult question as the meaning of *risk management* appears to vary greatly from one informant to another. It would seem that as far as academics are concerned, risk management involves the perils to which a course will be exposed over its lifetime, including things such as obsolescence, irrelevance, failure to attract students, and so on. Thus, the risks are future in nature rather than present. Administrators, on the other hand, see risk as current rather than future, possibly because the risks that occur in the present are likely to be their responsibility while those occurring in the future may be a problem for someone else. This meant that there were a variety of answers to this question:

- Risk management is something that is (or should be) kept completely separate from course accreditation – Those who gave this answer tended to view risk from a purely financial perspective. While it was agreed that there were numerous issues that needed to be faced (such as the commercial viability of a proposal, the revenue recoverable from fees, and so on) these were peripheral matters that had little relevance to the quality of a program. Course accreditation was seen essentially as a means of quality assurance where proposals were assessed against others on the basis of their content and rigour, and it was not the task of those involved in this form of quality verification to consider issues such as fiscal security.

Even where risk was seen as involving something wider than finance, its management was viewed as going no further than the welfare of staff and students – essentially as a Workplace Health and Safety (WHS) audit of course proposals. While it was recognized that Workplace Health and Safety could well be a quality issue that could become as ruinous as financial failure, it was felt that this was something that should be resolved in the delivery phase of a program, not when it came forward for approval.

Despite this, instances of obvious danger could be noted (a particular issue with programs involving out of classroom activity, such as Geological Fieldwork, or Sport and Physical Education) and a warning delivered to those responsible for course coordination, but even in this motherhood age no course could be knocked back simply because those not immediately

involved with its delivery thought that it might be dangerous. If there was any chance of risk, measures to counter it should be taken by the faculty, not by those approving its offer.

In this view course accreditation and risk management, while both important, were and should be completely separated

- Risk management should come into play only when there is a new, untried or unfamiliar approach. As such it should be the exception rather than the norm. – A number of informants felt that panels and committees could not shield themselves completely by placing the responsibility for risk on others. At the same time, risk management should only be conducted when it occurred within the terms of reference of the body concerned. If this was not the case it might well be regarded as an intervention by busybodies.

The majority of course accreditation committees had a specific responsibility to advise Academic Board of anything that might not have been considered previously, and this included those things that carried risk – particularly a risk to the reputation or academic standards of the institution. At the same time there was a reluctance to do this when the issue was believed to lie outside the expertise of its members, or where it might have been resolved successfully (or simply dismissed as irrelevant) at an earlier stage of the proceedings. Thus, course accreditation committees tended not to refer concerns about risk to Academic Boards. The one exception occurred where there appears to be a risk to safety or student welfare. While risk assessment is normally conducted at the initial proposal stage when approval is sought to develop the course, the panel providing this lacks insight into the fine details of the program (which at that stage have yet to be determined) and concentrates on issues such as financial viability, risk to reputation or threats to existing awards. If an accreditation committee should subsequently identify a risk to safety that appears to be otherwise unaddressed (such as the dangers involved in animal handling) the proposal is likely to be deferred until the issue is resolved. Under these circumstances a record of this deferral (albeit possibly without explanation) is normally included in the report to Academic Board

- Risk management should be applied whenever there is the potential for harm through inadvertence – This is something that may well be mouthed in principle but can rarely be applied in practice. The difficulty is the word “inadvertence” – a term implying lack of foresight or professional judgment – is ultimately a condemnation of those delivering the course rather than the proposal itself. As a result, this form of risk management (or more accurately risk intervention) is rarely, if ever, applied by course accreditation committees. There are, of course, inherent dangers in all forms of university activity but in the vast majority of cases these things are covered by existing protocols (such as lab safety rules) or by common sense. The issue becomes important only where it appears that the university may become liable through failure to provide adequate protection for its staff and students. (An example given by a safety officer involved the risk of fire with I-pad phones – an issue at the time (2017) with many airlines, although as far as could be determined no similar incident had occurred in a university. If students bring their I-pad to campus they themselves must take responsibility for any harm that may ensue. If, on the other hand, it is the university that provides the I-pad, or requires the use of an I-pad as part of the program, it is the university that must carry this responsibility, irrespective of whether the resulting fire occurs on or off campus. The solution, perhaps unsurprisingly, is for universities not to provide I-pads to students, or to make their use mandatory as part of a study program. Students can still use these devices but do so at their own risk.)

From the above example, the purpose of risk management would appear once again to be the protection of the university rather than its inmates. There can be fires in every pocket or handbag, provided none of these are the responsibility of the university.

This raises the wider question of the use of technology that might not have been envisaged when a course is proposed. As a general rule there would appear to be little link between the use of new technology and the risk management of courses, particularly at the point of approval. This was discussed at length with a number of members of course accreditation committees who indicated that the use of technology was regarded by their university as an aspect of delivery rather than an element of academic quality or rigour. Thus, courses were assessed on their academic integrity – as though they were to be offered in a purely traditional manner - rather than the instruments or methods required to service them. If new technology was introduced in the life of the course, but did not affect the course structure or outcomes, the matter was rarely referred to course accreditation panels, and was in fact considered none of their business.

- Risk management should be applied whenever there is the potential for harm through incompetence – This is something that few agreed with at first because it could rarely be applied in practice. There were three difficulties. The first was the implication of the word *incompetence*, a term suggesting a significant shortcoming on the part of staff – a judgment that none were willing to make. The second was the inability of panels to predict the unknown, and hence limit the possibility of risk, and the third was a feeling that it was not the responsibility of a university to protect fools from themselves. Thus, it is impossible to guard against every instance of poor judgment or inappropriate behaviour

Despite this, a number of informants felt, on further reflection, that universities need to be conscious of the dangers arising from potential staff or student incompetence for the sake of their own protection. This includes failure to conform with compliance requirements, inability to adhere to deadlines, to maintain records or ensure consistency of standards. These in turn could be overcome through the careful training and a close monitoring of staff, the development of protocols and the use of internal checks and auditors.

The danger was considered minimal where staff were familiar with procedures. Risk arose when something new was presented for which there were few precedents and no guidelines. (The example most frequently mentioned concerned cross institutional study. In days gone by the management of cross institutional study – where a student enrolled at one university but took classes by arrangement with another – was fairly basic. The student attended the other institution as though they were enrolled there and could be seen to do so. The delivery of courses by alternative means makes physical attendance unnecessary and this can lead to great confusion, particularly with visas.)

- Risk management should be restricted to specific matters, such as finance or resource availability – This was a limited approach, arising in most instances from a restricted view of risk management. Essentially it shifted the responsibility for risk from course accreditation committees to someone else, and even then, constrained the area of emphasis.
- Risk management should be applied at the discretion of the committee dealing with a particular proposal – This would appear to be the most common response, with each committee taking responsibility for those risks with which it is comfortable and familiar.

There are three problems, however. The first is the ability of the committee to identify and manage risk. Serious difficulty is possible if this is lacking or if the committee shows poor judgment. The second is the acceptance of these actions by others. The third is the consistency with which decisions are made, and the need to ensure impartiality. As a result, few informants were comfortable with the practical implications of this answer

- Risk management should be applied to all proposals irrespective of their nature - This is an ideal solution that is rarely practical. The key issue is time. Most proposals come to committees at the last minute and must be considered before deadlines close. While it may well be valuable to examine everything in depth this was usually impossible, particularly if pressure was on committees to get things through the system.

#### 9.5.10 Who (if anyone) is responsible for the risks arising from new courses or subjects?

There were at least four answers to this question:

- On the one hand, there is the question of legal risk – particularly the protection of the person or body that may be sued if risks are foreseeable and avoidable, but against which no precautions are taken (such as the use of hazardous chemicals in a laboratory). In this case there is a duty of care that must be exercised within the approvals process. If something is dangerous, the risk should be noted and justified before a proposal proceeds further.
- There is also the question of moral risk, where there is no legal liability but a moral responsibility, as might occur, for example, in the teaching of responsible lending in banking programs or the place of sportsmanship of games. Moral risks present little threat of litigation but if left unaddressed may prove harmful to the persons involved as well as the reputation of the institution. The risk in this case is inherent in the program content and is assessed on that basis.
- The third risk concerns the inability of a university to deliver all that may be promised. This may be due to misleading or over ambitious advertising, or it may be due to changing circumstances where there is every intention of providing all that is intended but which subsequently proves impossible. This risk is normally assessed early in the approvals process but may only become apparent much later.
- The fourth risk is the possibility that a program may be unacceptable to others. This may be due to something within the program itself (such as undisguised racism) or it may be due to an external perception (such as an unwillingness by others to recognize graduates due to the low standard of content or teaching). The difficulty is that it is often impossible to assess the probability of risks of this nature until the program has commenced, or until the first graduates are seeking employment. The risk can be reduced through conservatism – in other words by doing nothing that is unlikely to upset others – but can never be eliminated completely.

Each of these risks are considered separately by different parts of a university:

- The university as a corporate legal entity – The growth in litigation has made a number of Australian universities extremely sensitive to legal risk (Cameron & Klopper 2015). This, in turn, has contributed to the dependence of many institutions on their legal units as a component of their course accreditation procedures. As a general rule, legal units tend to be interested solely in legal risk – indeed if there is no threat of a court appearance (or a citation for non-compliance) legal units tend to be completely disinterested in the content or context of course proposals. Their task is to protect the institution rather than those within it.
- The University Council, as the body ultimately responsible for all risks in the institution – In the majority of cases the enabling legislation of Australian universities makes the governing body responsible for all activity of an institution including risk identification and management. This responsibility may be collegiate – where it is the body as an entity that is

held to account rather than its members - or it may be individual where malpractice occurs or where conflicts of interest arise (Armstrong 2007).

In the past a number of governing bodies have attempted to move the responsibility for risk to others, such as the Vice Chancellor, Academic Board, or institutional consultants, claiming in certain cases that they lack the insight enjoyed by those closer to the scene, and that the operation of the university depends on what others report to the governing body. It has since been shown that while this internal delegation may widen the net of responsibility, it cannot absolve the governing body or its members from the requirements of the institution's enabling legislation (University of Newcastle 2017).

For this reason, all Australian university councils have established their own Audit and Risk Committee (the title varies according to the institution) to provide assistance to the governing body. The terms of reference of these committees may focus on finance and investment, but as a general rule it is the responsibility of these bodies to alert Council to anything that may cause difficulty or embarrassment to the organization (University of Canberra 2017).

This last sentence is important, as it would appear that the primary role of these committees is to protect the governing body – and hence the university – from poor decisions (both financial and non-financial) through the provision of specialised knowledge and foresight (Stuart 2017). This protection may be limited, however, as full details of university operations (such as course accreditation) rarely come to the eyes of either the Governing Body or its Audit and Risk Committee.

Governing bodies safeguard themselves in this case through the provision of protocols to ensure that anything that is likely to embarrass the university is brought to their attention as early as possible. Thus, while Academic Boards have considerable freedom from interference in Australian universities, they remain fully accountable to the governing body for their actions and decisions. The governing body in turn accepts the ultimate responsibility for risk management whether the risk is incurred by Academic Board or some other servant or component of the institution, provided this protocol is followed (Macquarie University 2014). It seems questionable, on the other hand, whether this includes all risks or only those that may be foreseeable in the light of precedence or experience. Most councils limit themselves to the latter, as while the former cannot be excluded by denial, and an ability to perceive the unexpected exceeds the expectation of the community (University of Sydney 2016).

This limitation is ensured by dividing risk into two categories –organizational risk and operational risk. Organizational risk is risk that arises from the structure of the organization (including its delegation of powers) while Operational risk arises from its activities (Tattam 2017). University governing bodies take pains to maintain control over organizational risk but tend to leave operational risk to others. (Brewer & Walker 2010)

The implication for course approval rests in the procedural protocol. If the procedure prescribed by the university is followed diligently the risk rests with the governing body. If an issue arises that falls outside this procedure it becomes the responsibility of the person taking the action rather than the institution. (This is essentially the approach taken by TEQSA in the management of risk in Australian universities (TEQSA 2015). If risk arises from defective procedures it is the responsibility of the institution. If risk arises from the incompetence or deviance of rogue individuals the risk rests with those who appointed these people to the staff or gave them the authority to act, as well as the individuals concerned, rather than with the institution itself).

It would seem, therefore, that it is a general principal of Australian university management that the responsibility for risk arising from obedience to procedures – but not unthinking or carelessly applied obedience - must rest with the governing body. The responsibility for risk of other types rests elsewhere (Rowlands 2017)

- Academic Board, for approving or endorsing the course – If the responsibility for non-procedural risk rests elsewhere as suggested in the previous section, can this be placed on Academic Boards? The role of Academic Boards tends to be ill defined in most Australian universities where it often remains hidden under generalities, such as “responsible for oversight of academic activity within the university” (University of Canberra 2017). There are few cases in which university documents explain how this is to be done or the limits placed on the authority of this body.

It would seem, however, that as far as risk is concerned, Academic Boards are limited to foreseeable *academic* risks, both in the structure of courses and their delivery. The essential question is “What is meant by academic risk?” or more appropriately “What are the limits to an Academic Board’s responsibility?”

The term *academic risk* appeared to vary greatly from one informant to another. If we discount the meaning of this term when applied to students as irrelevant in this context, we are left with five possibilities:

- the risk that a decision of Academic Board will reflect unfavourably on itself
- the risk that a program will be unable to achieve its stated aims and outcomes
- the risk that a program will not meet professional requirements
- the risk that a program will not conform to government or regulatory requirements (such as the Educational Services to Overseas Students (ESOS) Act, the Australian Qualifications Framework (AQF), and so on
- the risk that the program will prove complex and unteachable, so that what is promised cannot be delivered.

In all of these cases the risk would (or should) be foreseeable and the board would be expected to seek change before the proposal is approved.

There are, however, a number of areas of academic risk for which boards might not be held responsible. These include:

- The risk of obsolescence through the emergence of new knowledge or technological change
- Failure to attract or retain students
- Failure of students to derive benefit (particularly employment) from the program.
- Failure to provide appropriate or timely administrative support
- Failure to provide adequate guidance and counselling for students.

These risks cannot be dismissed as irrelevant. The question is who or what should take responsibility for them within the institution? In the case of most Academic Boards the investigation of these peripheral risks is left in the hands of the courses accreditation committee.

- The Courses Accreditation Committee for making a recommendation to Academic Board – A far greater weight is placed upon course accreditation committees than is commonly realized. These bodies are not only required to make a recommendation endorsing course proposals – often in the knowledge that Academic Board will simply rubber stamp their suggestions without investigating further – but to check for anything that may inhibit the satisfactory delivery of the program, at least from an academic perspective. (The terms of reference of course accreditation committees are often vague and general, but it would seem to be assumed that one of the tasks of this committee is to alert Academic Board to any problems that may have been foreseen, and which may require further discussion before the proposal is approved. This in turn includes any possibility of risk)

It was suggested by informants that the great importance of course accreditation committees lay in the fact that their assessment of proposals comes towards the end of the process. The final product may be considerably different from what was approved at the initial course proposal stage, either because amendments have been made in the light of advice from various authorities or because circumstances may have changed. The courses accreditation committee therefore acts as a final filter before proposals go to Academic Board.

Three examples were provided:

- Courses accreditation committees are normally more aware of the strategic direction and internal feeling of the institution than less informed observers. If it was noted that there was a risk that a particular proposal could cause dissension the fact could be noted, and appropriate advice sought. (One example concerned contract programs – sponsored courses for the staff of particular employers. These may well be a valued source of revenue, but could they detract from the harmony of the institution, particularly if the sponsor was out of favour – such as the tobacco or coal industry – or if it was known that allowances, bonuses and over award payments would be made to those teaching, administrating or servicing these programs.)
- Course accreditation committees represent a diversity of skills and opinions. Collectively such a body, containing both academic and non-academic staff, may be able to perceive risks that are hidden from narrower groups such as faculties
- Course accreditation committees tend to be more familiar with external compliance requirements than many within the institution. External compliance changes rapidly and it is possible for amendments to be overlooked by others (including faculties) in an effort to get courses approved and running.

As a general rule, course accreditation committees are not responsible for administrative or unforeseeable risks. They are, on the other hand, expected to alert academic board to anything that may cause disruption to teaching or smooth commencement, such as a perceived lack of accommodation, equipment, staffing or technology, or potential damage to existing programs (James Cook University 2017)

- The Director of Risk (or equivalent) in the institution - As mentioned elsewhere there would appear to be little contact between the Directors of Risk (known by different titles according to the institution) and the course accreditation process. It would appear that most Directors of Risk are more concerned with finance and business arrangements than they are with courses and subjects.

Despite this, the Directors of Risk play a hidden (albeit indirect) role in this process, firstly by making the university and its staff conscious of risk (something that may not be innate in the minds of staff), and secondly by establishing procedures through which institutional risk can

be prioritised. The latter is particularly important as not all risks are expected to occur with the same frequency or to have the same consequences.

- The faculty and staff that will deliver the program - In many respects, on-going risk management falls by default to the staff teaching the course and beyond them to the faculty. Most programs are funded from within faculty budgets (or where more than one faculty is involved costs are shared on a pro rata basis) and it is normally the Associate Dean (Teaching) or equivalent who is expected to monitor the quality of delivery and make appropriate adjustments where necessary.

This presents a range of challenges to the course accreditation process. The first is that those who endorse courses are rarely aware of what may (or may not) happen after approval is given. All universities approve courses for a restricted period, often from five to seven years after which the program must be reaccredited with anomalies rectified, and with the documents upgraded. In the meantime, risk management becomes the responsibility of the faculty, and is likely to be managed without reference to outsiders.

The second is that faculties may prefer to protect themselves rather than the institution as a whole. Thus, staff may be retained (and content kept current within courses to justify the retention of these staff) beyond the point where this is wise or necessary, with the risk of the course becoming obsolete.

The third is that faculties may become overly protective of their courses, to the point where internal or external challenge becomes impossible. Thus, anyone within the faculty, school or department, who questions the veracity of a course immediately becomes suspected of disloyalty, while anyone outside is simply told to mind their own business.

Many universities avoid these difficulties by requiring programs to be trans-disciplinary where possible, or by cyclic restructure, although the issue of risk beyond the point of approval frequently remains unaddressed, particularly where programs require institutions to incur long term commitment.

Informants suggested that perhaps an even greater risk occurs where courses are offered by centres or institutes rather than faculties. (An increasing number of coursework programs, particularly at postgraduate level, are being offered by research centres, usually for reasons of convenience, staffing and equipment, a move that may place them at greater distance from faculty jurisdiction). These programs can become private and exclusive, particularly where administrative services are provided by the institute - and are funded from that source - rather than the central administration. A situation may arise where what is offered becomes different from what was originally approved, with the centre or institute behaving as though it possessed its own self accrediting authority, particularly where independently funded or where operating on a commercial or cost recovery basis. To avoid this most Australian universities severely limit the powers of their centres and institutes.

- The higher education regulators responsible for that particular institution – The responsibility of higher education regulators for the monitoring of institutional risk remains an open issue. The ultimate question is the level of intervention that the regulators (a term that includes all potential regulators – Commonwealth, State and Municipal, not simply TEQSA) are willing to impose and which the sector will tolerate.

At the moment TEQSA seems reluctant to do more than protect the reputation of the sector (and possibly the reputation of the government) rather than to safeguard any particular institution from its own folly.

This may be due to a lack of resources, uncertainty about instructions, the pressure of Universities Australia, and so on. A closer eye is maintained on universities by the Auditors General of the various states (who place emphasis on financial risk) and by local councils who are concerned by threats to the community (parking, traffic, student residences, litter and other costs to ratepayers – universities as educational bodies are normally exempt from rates and thus the costs to council they incur all on others).

As a general rule external bodies (including regulators) are more interested in the risks to themselves rather than the risks to institutions. They may, however, form part of the course approvals process, either directly (as in the case of professional registration authorities) or indirectly through a common membership on governing bodies. Their influence, however, is comparatively small.

#### **9.5.11 What (if any) are the risks to which universities are exposed?**

Most of the informants mentioned the risks to which they themselves or their unit were exposed rather than those faced by the institution. Despite this it was possible to develop a synthesis of the risks faced by universities in the course accreditation process. These included:

- The risk that the program may harm the reputation of the university. This was a matter that was taken seriously by many informants, possibly because their own job security was partially dependent on the confidence that the community was willing to place in what they were doing, but more probably because of a sense of loyalty to their institution.

Informants suggested that one of the strengths of a university was the sense of mystique that it maintained in the eyes of the community – an ivory tower that produced multiple benefits for society but whose inner workings remained closed to secular eyes. Few questioned the activities of a university provided this mystique could be maintained, and many forms of eccentricity that would be unacceptable elsewhere were tolerated simply because they took place in a tertiary institution.

This mystique could be shattered, however, if there was any evidence of scandal, incompetence or failure to adhere to the image that the community had created of what a university should be or how it should behave. Hence, universities make every attempt to protect their name and reputation to foster and sustain communal good will. (Winter, Wiseman and Muirhead 2006)

There were five things that were likely to cause a lack of confidence as far as courses were concerned:

- Failure to deliver what was promised (the perception of what was promised is a concept in the minds of the community rather than the university). This includes a failure to prepare students for employment as well as a failure to provide an appropriate education
- Excessive costs without the achievement of appropriate benefits. (Informants suggested that a surprising number of parents and sponsors blamed the avarice of universities for high fees and HECS debts rather than the government. Those responsible for the payment of fees – including the students themselves – expected to see value for their money and a sound return on investment.)
- Questionable topics, particularly those with which the community was uncomfortable (such as some of the complementary therapies) or which they saw as irrelevant (such as a

number of post-modern humanities programs). This did not mean that universities should avoid these issues completely but that adequate explanation should be given.

- Failure to adhere to moral norms and standard business practices. Informants suggested that the community – perhaps as a result of the mystique developed by the universities themselves – tended to hold these institutions to a higher standard of ethics and behaviour, similar to what was expected from the clergy. If this could not be achieved (and one slip may be more than sufficient) public confidence might well be destroyed. For this reason any suggestion of unethical behaviour could prove very serious, as would be any suggestion that a university was commending or teaching its students some form of unconscionable behaviour (an emerging issue in Banking programs).
- Criticism by other tertiary institutions. Informants recognized the fact that the general public were in a poor position to assess university programs, and normally accepted whatever was offered simply because it came from a “university”. This trust can be destroyed, however, by adverse comments from other institutions. It was important, therefore to ensure that these comments were not made in the first place, often by a process of sector loyalty that prevented institutions from openly criticising the work of their colleagues despite any misgivings they might have.

It would appear that the loss of public confidence (and the threat to finance this implies) is the greatest risk faced by a university, and that much of the course accreditation process (not least the publicity it is given by the universities) is intended to prevent this. This is particularly the case with those universities that appear uncertain of their legitimacy or which have not had time to establish their reputation (a process that may take up to 50 years – Gallagher 1982).

- That the program may cause financial embarrassment. This would appear to be the second cause of risk although not all respondents felt that it was important as reputational protection. There are five forms of financial embarrassment to which universities are exposed (taken largely from Panchamukhi 1977):
  - Misappropriation of funds by staff or others
  - Inappropriate or wasteful use of funds, particularly where publicly sourced
  - Inappropriate investment, capital spending or over expansion as evidence of poor judgment
  - Failure to restrict the causes of financial loss once identified
  - Institutional bankruptcy through poor financial management

The last three are particularly relevant in course accreditation. All courses require some measure of capital investment, and if the money is not spent wisely it is hard to avoid the criticism that it has been wasted. This is particularly the case where facilities and equipment are concerned, or where a choice must be made between several projects. Australian universities – under the oversight of numerous regulators and believing themselves to be underfunded - are therefore extremely careful how funds is spent.

Other factors revealing poor judgment are a failure to restrict losses when it becomes known that these are likely, or worse, a failure to curtail spending that might otherwise lead to bankruptcy. All affect the confidence placed in the institution by funding authorities (in Australia, essentially the Government) and the community. (TEQSA 2017)

- That the program may cause academic embarrassment by proving unattractive to students

There is always a danger that in preparing the best possible program from an academic or university perspective that it will prove unattractive to students, either because of its difficulty, its complexity or the manner in which it is taught and assessed. This could prove extremely embarrassing to the university concerned, not because there is anything wrong with the proposal itself – indeed quite the contrary – but because it shows that the university is out of touch with its students and their requirements.

The level at which a university should teach has always been controversial (Soley 1996) as what is delivered must satisfy two masters. The first is the academy, the discipline and the profession (which for this purpose can be regarded as a single entity). The second is the student body, and behind this those providing the sponsorship as well as those receiving the benefit. (Berkman & Plutzer 2012)

If a university chooses to offer a program at an inappropriate level, either in content or delivery (too low is as bad as too high) it will be quickly scorned by its peers and competitors. If, on the other hand it offers its courses at what it believes to be the right academic level – possibly at a level superior to others, and hence with greater rigor - it risks frightening away its customers. (Flinders University 2017)

What, therefore, emerges is a compromise between the ideal and what is acceptable, the risk being that neither group will be satisfied (Wappett 2012). This risk is traditionally avoided by pitching programs at the same level as competitors, and hence promising to achieve a similar outcome, while at the same time offering one or two additional features to make the programs of that particular institution more attractive to students. (Zimdars 2016)

It would appear that in Australia this matching of levels belongs to both the courses accreditation committee, which is responsible to the academic quality, and the faculty (which is normally responsible for delivery as well as the cost of advertising and/or the provision of marketing incentives). (Informants suggested that as a general rule this area of risk is rarely raised at the initial course proposal stage and occurs only towards the end of the approvals process when costs are foreseeable. Academic Boards normally see themselves as responsible for the quality of programs, rather than their marketing, but remain conscious despite this of the constant compromise between what is desirable and what is achievable.)

- That the program may reduce the number of students in existing awards – The danger in this case is that a new proposal may attract future students away from existing programs. This may result in the under-utilization of facilities or may require the redeployment of staff, often with considerable disruption. While there may be no change in the total number of students in the university there may be a considerable drop in revenue (if programs fall into a different cost band) or there may be a significant loss to a particular faculty if the new proposal is taught by a different academic group.

Australian universities avoid this difficulty in three ways:

- As far as possible almost all Australian universities insist that existing facilities be utilised for new programs, even if this involves a shortfall from the perfection that course developers expect. (Informants noted that courses are often written with an expectation of automatically receiving new or additional resources. The university, for its part, may approve the course but insist that the content be changed to allow existing resources to be used, even if this results in a less satisfactory outcome from a developer's viewpoint.) This in turn ensures that equipment (particularly in expensive fields such as the Sciences, Engineering and IT) will not be discarded until genuinely out of date, thus reducing the possibility of loss should demand diminish.

- The demand for new courses and subjects is closely monitored. If a new program proves more attractive than anticipated and starts to erode its peers (something that cannot be confirmed until teaching commences and the new offering has been in operation for some time) virtually all institutions commence an early phase out of those things that are less desired. This in turn may cause difficulties if the new course or subject is taught by a different academic unit.
- Most Australian universities with competitors in the same geographic area (basically the metropolitan area of capital cities) have contingency plans to counter student drift to other institutions. These normally involve the addition of something to make a course more attractive (which can be completely non-academic, such as an improved student lounge). The same can be done internally, with mandatory changes to a declining course (which the university for various reasons has chosen not to phase out) to make it more attractive.
- That the program may encounter unexpected difficulties – This would appear to be a common fear of Deans and academic administrators. While prudent leaders are aware of known risks (and hopefully can do their utmost to avoid them) less prevention is possible with the unforeseen. The most that can be done is to prepare contingency plans that can be brought into operation if problems arise.

The most frequently mentioned unforeseen difficulties were:

- The unexpected movement of staff (particularly where a high degree of specialisation is required and quick replacement is problematic)
- Failure of services or materials to be available when required (particularly the failure of IT contractors to deliver what was promised, and the failure of equipment suppliers to supply goods on time, both with being beyond the immediate control of the university)
- Changes to legislation
- Changes to demography and land use (particularly urban growth and environmental concerns)
- Changes to institutional policy and priorities

It is impossible to predict the probability of these risks and they can be managed only through contingency planning.

- That the program will become obsolete within a short period. Unlike the previous section, this form of risk lies partly within the control of the institution and its probability can often be detected through prudent management.

There are several forms of obsolescence:

- Technical Irrelevance – Technical irrelevance occurs when a program ceases to meet the needs of students (and ultimately the community). It should be noted that there may be nothing wrong with the program itself – indeed quite the contrary, it may be an exemplar of what is required - it is simply that what was offered previously has ceased to meet the need for which it was created and as such is no longer as attractive to students. If it is solely the quality of content or delivery that is challenged, rather than the need for the program itself, it may be difficult to close it, even though it may have become technically

irrelevant. This is particularly the case where there is a vested interest in the continuation of a course, irrespective of its value to students. (Jacob, Xiong & Ye 2015).

As a general rule, course accreditation committees make little comment on the relevance of courses. Indeed, it seems to be assumed by most universities that the relevance (and hence the attractiveness of the program to students) has already been assessed at the initial course proposal stage, normally as part of the Business Plan. Informants suggested that this was of concern for a number of reasons:

- There may be a considerable lapse of time between approval of the initial concept and its final submission to Academic Board for approval. Much may have changed during that period
- Much of the assessment of initial concept proposals involves questions of finance (potential income versus expenditure) with little discussion of fine details. As the course has still to be written no clear decision can be made on the relevance or otherwise of the final proposal
- Technical irrelevance remains a risk for the life of a course and is possibly a greater issue after a program has been offered for several years than at the point of approval
- As there is rarely a direct mechanism for irrelevance to be detected, the emergence of this risk must occur through other means, such as a decline in demand or adverse comments by the discipline or employers. This in turn delays remediation
- Once considerable investment has been made in a course there is a marked reluctance to relinquish what is already available. This is particularly the case where there is nothing wrong with the content or delivery, and where the award may be a leader in its field. The situation may well be made worse where university staff have made a strong personal contribution with the winding down of a program being seen as a professional as well as a personal affront.

Informants pointed out that universities often take an unrealistic approach to awards that are ceasing to be relevant, particularly where the first and possibly only indication is a decline in demand, by not cutting their losses but increasing their investment through greater advertising and publicity. Courses of this nature are rarely upgraded (the ultimate solution to the difficulty) but become bottomless pits into which universities pour money in an attempt to maintain the status quo. The effect becomes even more marked when the course itself is academically sound (and may be commended as such by the discipline) but where it ceases to be relevant to students.

Most universities take refuge in the fact that courses are approved for a limited period only and that a review is required before accreditation is renewed. This ensures (so the argument goes) that any defect will be picked up before it goes too far. Unfortunately, most of the information on which this is based is demographic (the number of applicants, the rate of attrition, and so on) rather than economic (the cost of running the course versus the immediate return).

Informants claimed to be aware of this difficulty but pointed out that demographic information was more readily available (and far more easily understood) than financial information, particularly where costs were based on subjects – which may be shared between courses - rather than on the programs themselves (Spaulding 2008).

Despite this, there were three forms of obsolescence that presented risks and difficulties

- Positional Obsolescence – Positional obsolescence occurs where a course has lost its attractiveness in the marketplace. The course itself may remain excellent, but demand may

have fallen for other reasons, many of which are beyond the control of the university. (Thus, there are many Accounting courses, of excellent value in themselves, that are ceasing to attract students because the demand for accountants appears to have peaked, and students are uncertain whether these courses – irrespective of their merit - will provide opportunities for the future)

Difficulties arise where staff became aware of this obsolescence but were unwilling to make the changes needed to accommodate it because there were other issues at stake. Universities counter this by requiring a review of programs at frequent intervals, almost always with statistical evidence of demand, enrolment and attrition, followed by revision and updating.

Positional obsolescence – which involves only those courses that have been in operation for some time – falls outside the responsibility of course accreditation committees and becomes an issue for planning departments, deans and senior management. Informants noted that there were few cases where academic boards became involved (or even considered the issue) until the course itself fell due for reaccreditation

Positional obsolescence occurs slowly and for this reason may pass unnoticed unless the situation is monitored. This is not true for the other risks – Content Obsolescence and Context Obsolescence – both of which can occur suddenly and take the institution by surprise.

- Content Obsolescence – While it is traditional to regard Content Obsolescence as a feature of disciplines undergoing rapid change (such as Computing or IT), informants suggested that in Australia a greater danger came from unexpected change in government or professional body requirements, with the universities being expected to change paths immediately – a task that was often impossible. (Reference was made to Primary and Secondary Teaching, where immediate change had been requested for political or educational reasons, and to Science and Engineering where there was a shortfall in numbers – but easily solved according to governments by universities increasing their enrolments, while overlooking the fact that it took many years to train a competent professional)

Informants suggested that content obsolescence was less dangerous when it affected all universities, as all may take a similar time to change, and tardiness in one institution was unlikely to attract the attention of competitors as all would be undergoing transition at the same time. The situation became more obvious - and hence more serious - when the discipline was offered by only one or two institutions (with consequences for employment) or was subject to a paradigm shift, where a failure to update content could lead to immediate irrelevance.

Universities counter the risk of content obsolescence by monitoring the suggestions of stakeholders and external advisory committees. Informants suggested that this is not an area on which dependence could be placed on institutional staff who may have a vested interest in continuity. Again, this was an area in which academic boards rarely became involved.

- Context Obsolescence – Context Obsolescence occurs when a course no longer integrates with the world around it. The course itself may be of high standing and remain of excellent quality but its failure to meet user requirements makes it of little value. (An example concerned Pharmacy. Traditionally these programs have involved the mixing of medicines, the grinding of powders and the blending of ointments. These skills have not been replaced by something new – as might occur with content obsolescence - but are less required in a modern dispensary and hence have been removed (or at least greatly reduced) in the current curriculum. The material retains its academic integrity, and may well be the subject of continuing research, but the context within which it is presented to students makes it completely redundant).

Informants suggested that while it was comparatively easy to detect content obsolescence it was much harder to avoid the risk of context obsolescence, as it required an impartiality wider than the discipline. Informants felt that those making decisions were sometimes too close to their subject - or too enthused by them – to notice a slippage of context. The university normally became aware of the problem from the concern of outsiders and the disinterest of students.

Unlike Positional Obsolescence, both Content Obsolescence and Context Obsolescence were academic matters that were expected to be addressed by course accreditation committees. The difficulty, however, lay in the fact that these bodies were forced by their terms of reference to be reactive rather than proactive, and while more than willing to consider matters referred by others, were unable (or at least most reluctant) to initiate action as a first cause. This in turn meant that while existing courses were in operation little could be done. Course accreditation committees (and the academic boards they advised) were unable to intervene until the program fell due for reaccreditation, an issue with obvious implications for risk management

#### **9.5.12 The withdrawal of approval**

Informants were asked whether academic board could withdraw approval, either before a course commenced or at some stage later if matters came forward that might have justified the withholding of approval in the first place. The question appeared to come as a surprise to many, most of whom noted that while this was possible in theory it had never occurred in practice, and hence was unproven territory.

Informants noted that in the vast majority of universities, once a recommendation had been made to the University Council no further action was possible without the concurrence of that authority. [Academic Board had in effect completed its task and nothing more could be done without the agreement of Council] As such, as soon as it was agreed that a proposal be approved anything further was the responsibility of the Vice Chancellor as the Chief Executive Officer of the governing body. Academic boards claimed no control over those teaching or servicing courses, nor could they address the effectiveness with which programs were delivered. As such the most that could be done in the event of error or scandal was to recommend that approval to deliver the course be withdrawn.

[It would appear from the comments of informants that the authority of Academic Boards to cancel courses varied from one university to another depending on the powers delegated by the governing council. On the one hand an academic board may have been given complete power to approve courses and oversight their management. In this case Academic Board acts as the representative of Council and simply reports its actions to that body, which the Council accepts without question. On the other hand, an academic board may have the power to approve courses but not to oversight their progress (a matter that may lie in the hands of a Teaching and Learning Committee or equivalent). In a third case Academic Board may be seen as a purely advisory body, whose powers are limited to providing a recommendation to the governing council, which may be accepted or declined, although the latter is rare. This range of delegated powers has many implications for the correction of errors, including the cancellation of course approval]

Despite this, most informants seemed to believe that Academic Board has a *moral* responsibility (if not the legal powers) to request that a particular program not be offered (or if currently in operation that it not be continued) if there were circumstances that might cause distress or embarrassment, particularly where this threatened the reputation of the university.

How this would be applied varied from institution to institution, with many noting that the issue had not arisen in their time with the university.

Informants were equally divided on how this would be applied as there were few precedents. It would cause great difficulties if courses were cancelled without reference to staff and students, and there were few universities that would permit this. A university may decline to admit new students, but (after reform) allow existing students to be taught out. Alternatively, the course may be allowed to continue (again after reform) but its future reaccreditation denied.

The key difficulty was the fact that in most universities there was no “procedure” for the withdrawal of approval – most agreed that approval could be withdrawn but few could specify the steps or the aftermath, and it was strongly suspected that informants were expressing suppositions about what might happen rather than some firm statement of institutional policy. The multiplicity of answers gave further assurance of the need for procedures (as opposed to the guesses of staff) in the accreditation and risk management of courses.

## 9.6 Conclusion

Universities face many risks, not all of which can be addressed as part of the course accreditation process. At the same time Australian universities have a high expectation of those engaged in the course assessment, and where possible expect these persons and groups to identify problems and alleviate risks. The difficulty, however, is a lack of training and experience (a deficit caused by a shortage of time and money) and it is for this reason that dependence is placed on a diligent following of procedures, which while not perfect in themselves can at least set boundaries to appropriate behaviour.

In the following chapter (Chapter 10) the conceptual framework governing the research will be discussed in greater depth. It is realised that it is unusual to place the conceptual framework so late in the thesis, as normally this is something that would be addressed before the methodology, possibly in the belief that the former should shape the latter. At the same time, it is believed that no apology need be made for reversing the order here. The researcher commenced with a clean slate, with a range of potential alternatives, each of which was untried in view of the novelty of the project. This uncertainty took the researcher down many by-ways, some profitable while others proved interesting but less relevant. It is only as one nears the end of the journey that the ultimate pathway can be traced.

## Chapter 10 Conceptual Framework and Conclusions

*The purpose of this chapter is to link the findings from the research with the conceptual framework that underlies the thesis.*

The material has been divided into six parts;

1. A restatement of the “thesis” being defended
2. The conceptual framework used to defend the thesis
3. The methodology used to conduct the research
4. The findings
5. Discussion of these findings
6. Areas for further investigation

While it may be unusual to present the conceptual framework so late in a thesis, this has been done to avoid disruption to those seeking practical information from the earlier chapters.

### **The conclusion reached as a result of this research**

**Risk Management forms an essential component of course accreditation in Australian universities but is applied through the rigorous use of procedures rather than the conscious actions of staff.**

#### **10.1 Justification for this Conclusion**

While the context has been explained in depth in previous chapters (particularly Chapters 1 and 2) it may be appropriate to mention it once more to establish the frame of reference within which the research was conducted. Australian universities have a right through their enabling legislation to approve the programs of instruction leading to their awards without external interference. As mentioned in Chapters 1 and 2, there is no set procedure for undertaking this assessment, and each university has developed its own system for assuring that the programs that it offers will be “fit for purpose”.

While these procedures vary markedly from one institution to another, there are a number of features that are shared by all. One of these is the need to identify and manage “Risk” (a term that in itself has multiple meanings). As explained in Chapter 3, “Risk” can occur in many forms and is regarded with varying degrees of seriousness by the university involved, dependent on their risk awareness, their risk appetite, their current commitments and their vision for the future. At the same time it would appear from both the documents provided by the universities and the interview of staff that the identification, control, and mitigation of risk is considered too complex to be left in the hands of those whose expertise lies in other fields, particularly when the constant movement of personnel gives insufficient time for skills in risk management to be developed.

To counter this, all Australian universities have developed policies and procedures to manage risk in all forms across all areas, and this is a matter that informants suggested was taken seriously and pursued rigorously across the sector. At the same time, it was apparent that little attempt was being made to control risk through the training of staff, almost certainly because the numbers, cost and logistics required made this impossible.

The conclusion was, therefore, that **Australian universities – as a matter of policy - protect themselves against risk through the enforcement of procedures rather than the training of staff.**

While this axiom appeared applicable to many areas of university operations, it seemed particularly relevant to course accreditation where proposals pass through the hands of numerous persons and committees before courses are approved and teaching can commence. It would appear from the comments of informants that each of these bodies worked in quasi-isolation, often without knowledge of the workings of the others but that the “glue” that give unity to the whole was the constant application of a tight set of procedures that governed the activity from beginning to end.

As each university set its own requirements for the approval of courses, these procedures appeared at first sight to vary widely, but it was soon realised that most of the differences were caused by local factors and were largely superficial. Beneath the verbiage of their documentation, all institutions claimed to be seeking the achievement of a common outcome - essentially a determination of the “fitness for purpose” of course proposals by peer review - although each might approach the task from a different direction and in a different manner.

It would appear, in summary, that despite all diversity of practice and procedure, Australian universities are seeking as a common objective to ensure that their courses are “fit for purpose”. This does not mean that the programs they offer are expected to be exemplars of pedagogy, outstanding examples of scholarship, or the paradigms most suitable for students, all of which, while highly desirable, might not be attainable. What each institution seeks in place of this is an assurance that what is on offer is the most suitable compromise between the conflicting demands of what society and/or the academic community expect, and the university’s capacity to meet these requirements (Voinovich 2002). As each university has different commitments to a different audience (and widely divergent means), the procedures used to assess courses must also differ from one institution to another. It is not a matter of what the universities might do to assess proposals that is important but the outcome they ultimately achieve. This point is not lost by TEQSA in its oversight of the sector, wherein great flexibility is allowed as to how courses are approved provided the finished product is acceptable (TEQSA 2017b).

At the same time these procedures had not been developed in a vacuum, nor (because they existed well before the rise of regulatory bodies such as TEQSA) were they solely the product of external pressure. While time did not permit a detailed examination of the original documents, it would appear from the comments of informants that arrangements were in place from at least the 1890s for the internal criticism of curricula by Professorial Boards at the Universities of Sydney and Melbourne. To assist in the smooth running of meetings, Professorial Boards had a set procedure for meetings, including where necessary the use of sub-committees for the discussion of awards, curricula and exam results (Selleck 2003). These in turn are believed to be the source from which current course accreditation procedures have been derived (Informant 13)

Academic Committees (to avoid confusion with Professorial Boards the term “Academic Boards” has been avoided in this paragraph, even though this title was (and is) used by many universities) were intended to be more representational than the Professorial Boards that they replaced. As a result, they were larger, more cumbersome and more bureaucratic than their less formal predecessors. (Dooly 2005). This in turn meant that many issues that were previously handled in meetings of professorial boards needed to be referred to working parties and standing committees, including the pre-approval review of courses. At the same time a gap emerged between the academic and administrative aspects of the process. While Academic Committees gave specific instructions to their sub-committees, they were not empowered to address those matters for which they had no responsibility, such as the backoffice tasks associated with administrative procedures. For this reason, wider and more embracing directives were developed by the governance support units of most Australian universities with a view to integrating the instructions of Academic Committees to their committees with the

requirements of senior management, and it was at this point that current course accreditation procedures came into effect as a link between the academic and the administrative requirements of a university (Informant 13). While few of the post-Dawkins universities commenced with Professorial Boards (most emerged long after these bodies had been dissolved) much of their structure was taken from their longer established predecessors, and hence a similar relationship was assumed to exist between academics and administrators, with governance support units acting as referees if required (Informant 19).

Informants noted a deliberate separation of management from those tasks more appropriate for Academic Boards. While policy and procedural statements were developed by governance support units on behalf of the former, they could not be implemented, at least as far as academic issues were concerned, until approved by the latter. This in turn meant that controversial factors (or those likely to promote dissension or delay in Academic Boards) were often passed over in silence, without mention in formal documents (Informant 13). Informants suggested that Risk, as such, was of lesser interest to Academic Boards, but of greater importance to management, and its inclusion in the material sent to Academic Board could become a distraction rather than a benefit. This would appear to be the reason that while Risk Management forms an integral part of course accreditation across the sector, the term is rarely mentioned in the procedures published by Australian universities.

## 10.2 The Conceptual Framework Governing the Research

The research commenced with a study of the course accreditation procedures of Australian universities, not with a view to noting differences but with the intent of identifying commonalities. This was done by a study of the procedural document published by the universities themselves, followed where necessary by the interview of staff to fill gaps and correct misunderstandings.

This enabled numerous factors common to all self-accrediting providers to be identified, although only one, the impact of risk management on course accreditation procedures, was followed through to its conclusion.

It is important to note that this concept was not developed as a hypothesis in anticipation of the research – in other words, from taking a set position and then looking for evidence to sustain it (while possibly ignoring or downplaying anything to the contrary). The concept emerged as the solution to a problem – How do Australian universities risk manage their courses? – and this could not be verified until all practical alternatives had been eliminated.

There were five possibilities:

- It was conceivable that universities select the staff involved in their course accreditation process on the basis of their prior experience in risk management. This was found to be demonstrably untrue and was not considered further. The data showed that staff were selected for a variety of reasons, such as expertise in curricula or administration, or by virtue of their office within the institution, or again because they were representative of particular groups. None, and this term is used in an absolute sense, were selected for their skill in risk management.
- It was possible that universities provided training in risk management for those involved with the course accreditation process who had not been exposed to it previously. This again was demonstrably untrue. No informant claimed that they or any of their colleagues had been given any instruction of this nature and, to most respondents, the thought that their institution would have the time or opportunity to release staff for this purpose, particularly when such large numbers were involved, seemed absurd.

- Perhaps the accreditation process is overseen by a person (or a unit) with specific skills in risk. This was also found to be untrue. While there is normally a university officer with responsibility for the smooth working of the approvals process (such as a Director of Quality or the DVC Academic) there appeared to be no link between this person and the risk management of course proposals. While Directors of Risk has been appointed to most Australian universities it would seem from the data that their role is confined almost exclusively to the traditional areas of finance or safety and that their involvement in course accreditation is minimal.
- It was also possible that the avoidance of risk was the role of institutional compliance officers. Again, this was demonstrably untrue. While almost all Australian universities have appointed one or more “compliance officers” to oversight their activities, the role and status of these individuals varies and can extend from experts in the institution’s legal unit to a low grade clerk in an obscure corner of the campus. The responsibility of these persons can extend from copyright and intellectual property litigation to ensuring that returns of all types are submitted by the due date or that all boxes are ticked and that there is no breach of requirements. Their involvement with course committees is minimal, as is their responsibility for risk avoidance.
- Risk in course accreditation is controlled – or at least monitored – by external regulators. Again, this was demonstrably untrue. The data showed that while the prime regulator (TEQSA) is most certainly interested in risk, this is risk to the sector as a whole through poor management of the institution itself rather than the threats presented by specific courses. Thus, while TEQSA (and others, such as the state Auditors General) are most certainly interested in the procedures used by universities to assess risk in all of their activities, they play no role in their implementation. TEQSA, for its part, has been content to establish a set of “threshold standards”, the bare minimum that it expects to see from those under its jurisdiction. Provided these conditions are met, neither TEQSA nor any of the other regulators have close involvement with the course accreditation process. They are most certainly not responsible for the micro-management of the risks that arise from individual proposals.

Despite these false trails it remains true that all Australian universities (there are no exceptions) remain conscious of risk and are anxious to have potential threats identified and controlled. The question therefore arises “How do they do it?” The answer, similar to the plot in a stage production, would appear to lie in the script rather than the actors.

Few actors are allowed to ad lib before the footlights – their task is to be faithful to the text of the playwright and the directives of the producer. It is the same in course accreditation. None of the groups involved in the process are free to wander at their own discretion, they have a set task to perform and are given strict guidelines on how to do it. This hardly removes personal responsibility, but it gives at the same time a high level of consistency from one performance to another.

At the same time a solution of this type hardly resolves the issue because (as Plato, Bonaventure and Aquinas remind us) behind every outcome there must be a cause – is it possible therefore to trace the source of risk management in course accreditation procedures back to its first cause?

Universities, despite their fetish for records and the citation of sources, do not have a good reputation for leaving paper trails, with most operational documents discarded as soon as they have been replaced by others while the originals are allowed to drift into the depths of time. It is therefore difficult to retrieve obsolete procedural documents from universities, much less to discover their author, as once something becomes obsolete it is simply removed from the website and pending a lengthy archives search is simply no longer available.

Nor do most staff members seem to know who originally wrote their policies and procedure, or from whom – as noted by some with malicious glee – they were clearly plagiarised.

Fortunately an alternative exists to this lack of source material through the Wayback Machine (<https://archive.org/web/>) an internet archive that records past web pages. Thus, if something was originally on the web but has since disappeared it may still be possible to retrieve it even though it has vanished forever from the website of its original owner.

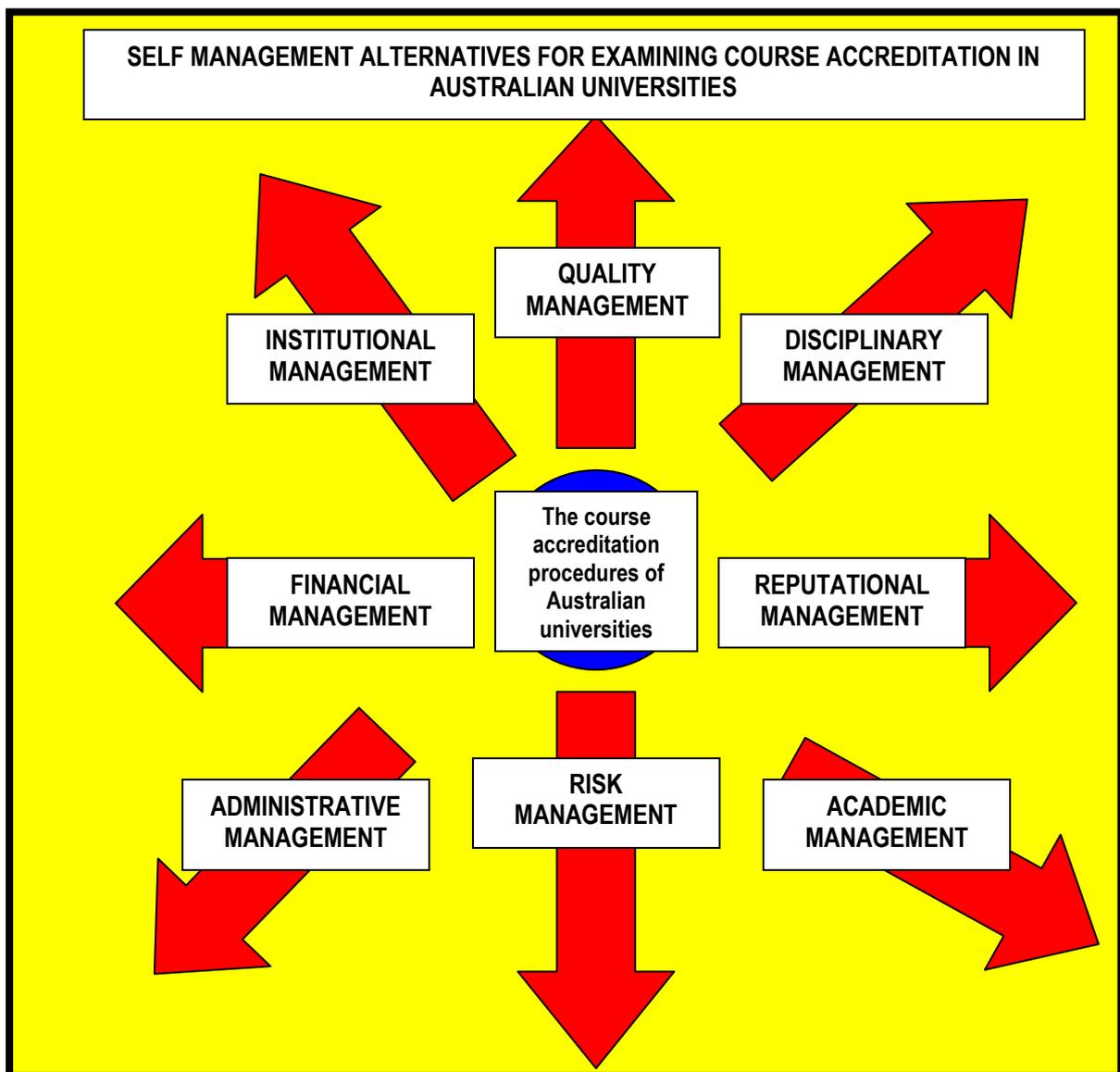
The research commenced as a comparative examination of the current course accreditation procedures of Australian universities, which are normally available to the public through institutional websites. While these procedures vary in detail there were five features found in common (and without exception) across the sector:

- The procedure prescribed is the only one recognized by the institution. While there may be a limited number of short cuts to meet emergencies (such as a signing off of documents under executive authority to meet tight deadlines) these are regarded as exceptional, and under normal circumstances no variation from the published procedure is permitted. Indeed, the omission of any one step from the process is sufficient to invalidate the procedure as a whole.
- The same procedure is used on every occasion irrespective of the discipline or the level of award. (Research degrees are normally processed in a different way and are not considered here). Thus, the same procedure is used for all proposals within the same university, from an Associate Degree to a Coursework Masters, without variation or exception – indeed the process itself is kept completely separate from (and independent of) the nature of the award.
- The same rigor of enquiry is applied to all proposals, irrespective of their source or sponsor. While more may be expected from students in advanced degrees, the same criteria is used to assess the fitness of what is proposed irrespective of the course or content.
- Procedures are rigorously enforced, with staff called to account if there are departures from what is laid down. While certain decisions may be made collaboratively by committees, this does not remove the responsibility of individuals (such as committee chairs) for ensuring that due process is followed.
- According to the material produced by the universities it would appear that few of the staff involved in course accreditation receive formal training for their role, particularly in areas with which they may be unfamiliar (a matter confirmed later by informants). This omission becomes particularly significant where risk identification or mitigation is involved.
- There is an inconsistency in the depth of information provided. Much is explained to course developers (many of whom may be facing this task for the first time) but little is explained to administrators. This means that virtually all of the information provided on websites is incomplete. It was for this reason that the documentary component of the project could be used only be a commencing point, without being sufficient in itself to reach a conclusion.

As explained in Chapters 7 and 8, the operation of a university is essentially an exercise in self-management, with each academic community determining for itself the persons on whom it will confer its degrees, the criteria that graduands must exhibit, the tasks required to confirm that students reach acceptable standards, and (where not supplied from other sources), the teaching to be provided to enable these standards to be achieved. Very little of this is determined by outside agencies, and despite the fact that there are regulatory requirements to which Australian universities must conform, such as the Australian Qualifications Framework (AQF), these are imposed to ensure compatibility between institutions rather than as directives that tertiary providers must obey. For this reason, all external requirements are accepted – at least in theory, as defiance may have financial and regulatory implications – on a voluntary basis by providers (Harman 1983).

Teaching occurs in partnership with all other activities, and while it provides a source of publicity and revenue it forms only one part of the organization’s relationship with its community (UNESCO 1991) Despite this, no university can afford to neglect its programs of instruction, and one of the many functions of a university is to “manage” that teaching effectively (Scott, Coates & Anderson 2008). This includes the assessment of courses before their commencement.

It is possible to examine course accreditation from the many aspects of self-management found in a university, as illustrated in Figure 10.1.



**Figure 10.1 Perspectives on Course Accreditation**

It will be seen that all of these involve some aspect of governance within the context of institutional self-management – a limitation placed upon the research to avoid questions of Pedagogy, Curricula or

Student Satisfaction, all of which play a legitimate role in the accreditation process but which might otherwise cause distraction.

The aspect of self governance used to examine course accreditation was Risk Management, chosen because it was relatively self-contained and was an issue of interest to Higher Education regulators as well as the universities themselves. It was necessary, however, to put priorities into perspective. It was agreed that the *topic* to be investigated was course accreditation, but this was to be examined predominately from the *perspective* of risk management. It was not to be a study in Higher Education Risk Management that would use course accreditation simply as a quarry from which to draw examples.

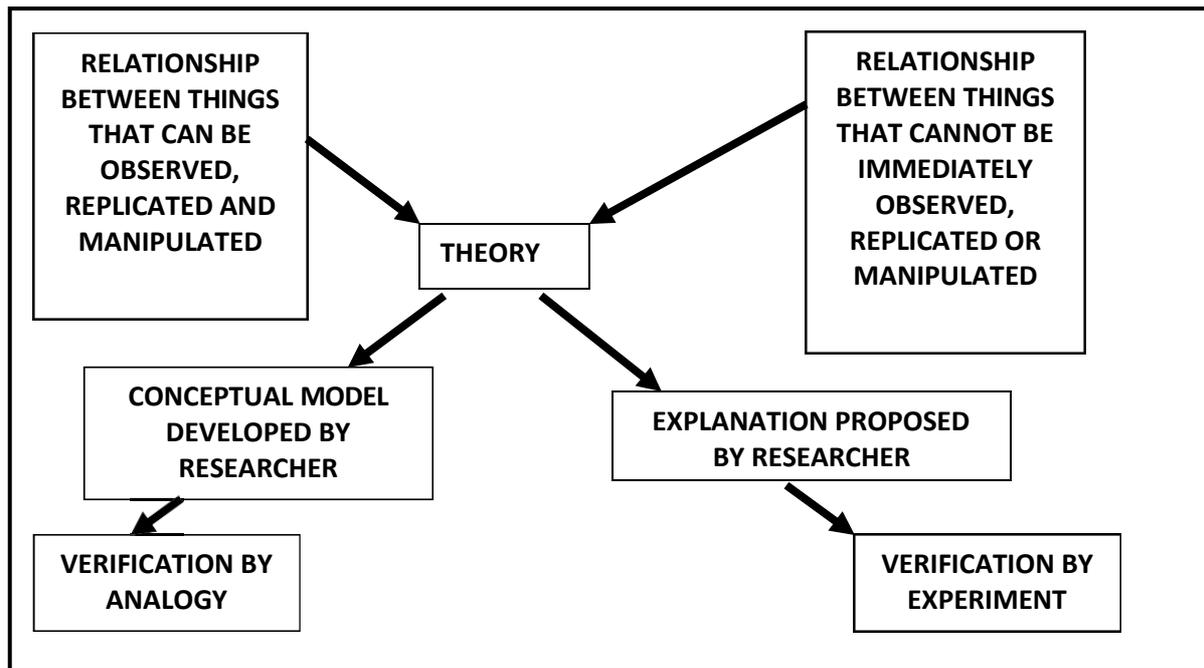
Each of the possibilities listed in the chart on the previous page has its own body of literature. For this thesis much of what others had contributed towards the topic could be found in the Higher Education Risk Management literature – originally a sub-set of the Enterprise Risk Management literature more commonly used in Business, but now sufficiently adapted to the needs of the sector to be a field in its own right. (Unfortunately, there is no similar pool of knowledge for Higher Education course accreditation procedures and those who wish to explore must work from the original sources.)

The fact that a body of scholarship already existed for one component of the study (Higher Education Risk Management) imposed a limit on the conceptual models that might be constructed. Despite this, the discipline of Risk Management in Higher Education (if not in other fields) is of comparatively recent growth and has had little time to develop its own traditions (Ruzic-Dimitnjevic & Dakic 2014) This gives a degree of flexibility that might be missing in more traditional areas such as the study of Higher Education Finance or Higher Education Strategic Planning, both of which are closely fenced by paradigms.

### 10.3 The Conceptual Model

Conceptual models are normally defined as a mental replication of the relationship between two factors or entities (Frohlich, Corin & Potvin 2000). The term *mental replication* is used deliberately as these models are relationships that exist *in the mind*. Hence everything depends on the interpretation. If the interpretation is wrong, the model is faulty and the result misleading (Ravitch & Riggan 2012).

Unfortunately, not all conceptual models can be verified, and where this happens the researcher is forced to fall back on analogues and then use the *theory* or explanation this provides to construct possible scenarios (or conceptual models) to justify what must otherwise remain unverified. The relationship between the things that can be observed, replicated and manipulated, and those where this is impossible is explored further in Figure 10.2.



**Figure 10.2 Relationship Between Observation and Theory**

Figure 10.2 reflects the difference between those occasions when relationships that can be verified by *direct experiment* and those that can be confirmed solely by *analogy*. Most conceptual models in the Social Sciences fall into the latter category (Popper 1963) (Those things that can be verified by experiment are usually preceded by a “hypothesis” rather than a “theoretic model” - Bendassolli 2013). As there are many possible choices – none of which can be demonstrated to the exclusion of others - there are few cases in which there can be only one completely accurate conceptual model. On the other hand, false or inadequate models are quickly excluded by their improbability and the fact that they don’t fit the circumstances (Popper 1959).

It will also be seen from the diagram above that the point where both manipulative and unmanipulative data interact - indeed the one thing that both will always have in common - is “Theory” – the explanation behind what happens - and for this reason every “conceptual model” should ultimately be seen as an extrapolation of a selected theory based on analogy (Goertz & Mahoney 2012).

It seemed, therefore, that in constructing a conceptual model, it would be essential to choose the most appropriate theory on which to base it (Grant & Osanloo 2014). If the theory is ill chosen, the outcome will be misleading. It is important, therefore, to have a sound understanding of the theory one plans to use before venturing to construct a conceptual model (Glanz & Rimer 1995).

All theories (and hence all conceptual models) are grounded on methodology (Steiner 1963). This arises because no theory can have any foundation without at least some evidence (otherwise it becomes a metaphysical speculation) and no evidence can be produced without some form of methodological background (Nilsen 2015). In the end every explanation depends on the interpretation of evidence, and this in turns depends on the way in which data was gathered (Ritchie, Lewis, Nicholls & Ormston 2013) Thus an inadequate methodology (caused by an inappropriate frame of reference, can easily lead to a defective theory, as illustrated, for example, by the ancients who believed that the Sun revolved around the Earth, not because of any shortage of intellect, but simply because their conceptual model was inappropriate. Figure 10.3 shows this relationship. (model based on Edmonds & Kennedy 2017)

It will be seen that theory as explanation rests largely on personal knowledge (either acquired directly or gained from a third party). It is important to distinguish between conceptual models (the relationship that exists in the researcher's mind) and paradigm frameworks (the relationship previously established by others within the discipline that governs their own thinking) as both may affect the validity of what is conceived (Graham 2013).

Research normally commences with a pre-established *frame of reference* based on a broad, assumed or general knowledge of the relationship between two factors (Toynbee 1934) This initial frame is usually a product of the researcher's education, past experience and values and may vary greatly from one person to another. In the majority of cases, this frame of reference is accepted by the person involved without further challenge (Wendland 2014) - a mistake as not everything associated with it may be relevant. Hence, many factors that might form part of an initial observation are, after appropriate consideration, dismissed. From those factors that remain the researcher constructs a personal belief system to explain what has occurred. This belief system is used in turn to create conceptual models (Ross 2004).

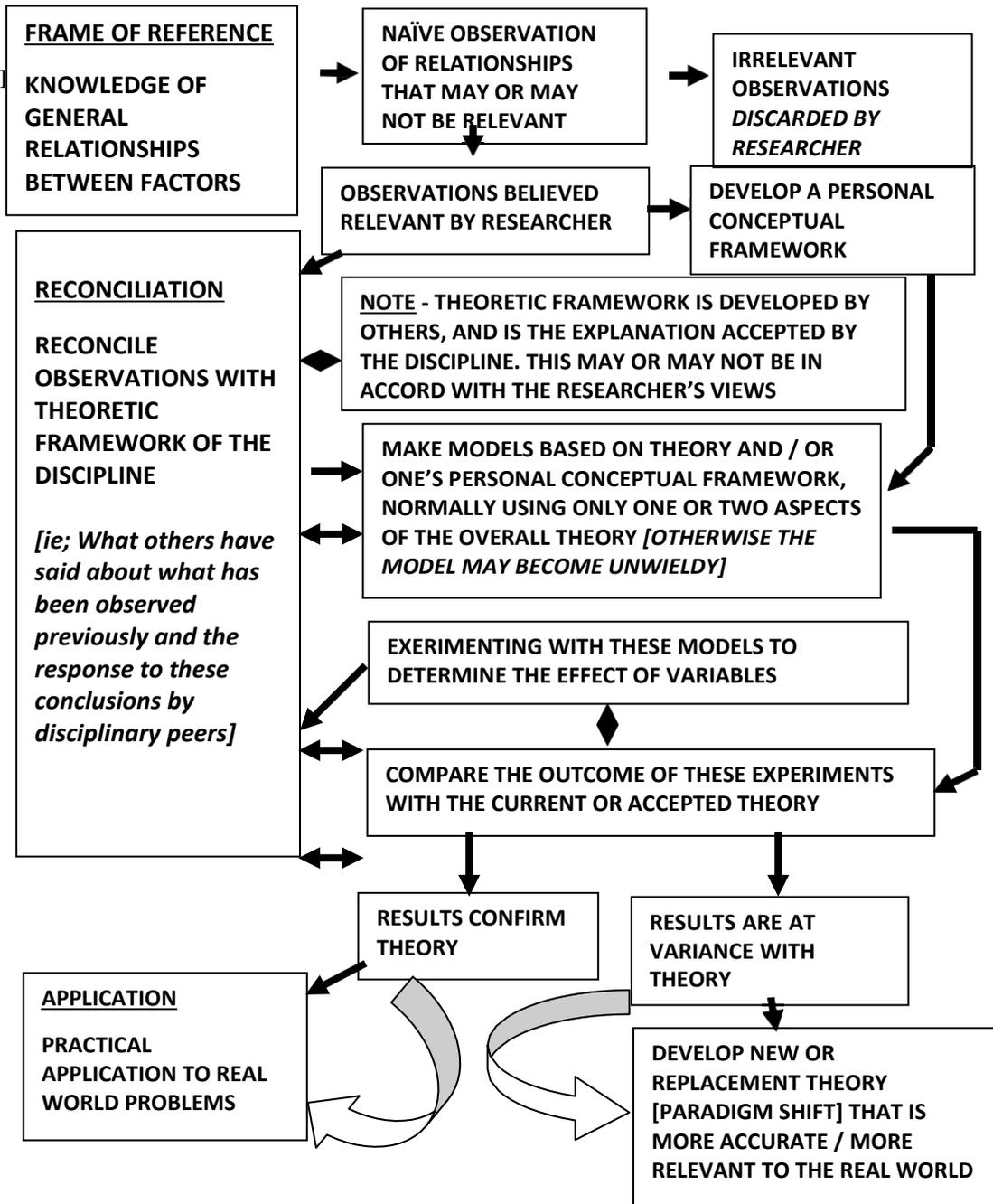


Figure 10.3 Frame of Reference

While conceptual models are unique to their developers (as each is conceived in the mind of its originator), few are completely new or novel (Poels 2003). In practice, most researchers use the theoretic framework developed by others to interpret what they see and hear, and the result will be an amalgam of a number of these frameworks (Green 2014).

Several conceptual models (or theoretic templates), were postulated, using the following assumptions as limitations:

- This was to be a qualitative study, and qualitative studies are essentially comparative (Esser & Vuegenhart 2017) involving the examination of a range of objects within a closed field (Kannegieter 2010). In this case, the field was course accreditation in Australian universities. Thus all other aspects of university operations within which risk management might occur were therefore excluded.
- A constructivist research pattern along the lines suggested by Neimeyer & Levitt (2001) was felt most appropriate for the project. This allowed data to shape the concepts arising while at the same time preventing these concepts from influencing the collection of this data. Neimeyer & Levitt suggest in their article:

.....a research method might be classified as constructivist or social constructionist to the extent that it

(a) elucidates 'local' as opposed to 'universal' meanings and practices,  
 (b) focuses upon provisional rather than 'essential' patterns of meaning construction,  
 (c) considers knowledge to be the production of social and personal processes of meaning-making, and  
 (d) is more concerned with the viability or pragmatic utility of its application than with its validity per se.

This emphasis on local, provisional, and pragmatic assessment of (inter)personal meanings can be illustrated by a closer consideration of three core techniques associated with a constructivist or social constructionist approach, each of which encompasses many different variations. These include repertory grid technique, analysis of narrative processes in spoken or written 'text,' and discourse analysis. (Page 2651)

This in turn required:

- Paying particular attention to the explanations provided by individuals, even if these were contrary to those expressed by their colleagues or the rest of the institution
  - Focusing on provisional rather than "absolute" meanings and practices
  - Realizing that responses were simply the construct of an informant's mind, based on their own interpretation of what they had been told previously, what they had observed, and what they had pieced together for themselves through a process of cognitive dissonance
  - Noting the consequences of the belief of individuals on their actions and feelings (essentially "turning their thoughts into unconscious action" - Burr 1995)
  - Considering the use of data analysis tools such as Kelly's Repertory Grids, Narrative Dissection, and Discourse Reductionism although it was not clear they were relevant to this particular task.
- This was to be an exercise involving ontological research, asking "What is the nature of reality?" as seen through the eyes of informants rather than through the pre-existing mental concepts of the researcher. *Reality* under these constraints is not the researcher's own reality, even if it is sometimes confused with it – a differentiation going as far back as Whitehead (1929)

- It was also a project involving epistemological research, with questions about the relationship of the research to knowledge in general. It would be easy under these circumstances to get information overload. Much that would be uncovered would necessarily be discarded – or at least pass unreported - not because it was valueless, but simply because it fell outside the boundaries required (Waddington 2012)
- The work was also seen as an exercise in anthropological research because the focus was human activity – course accreditation, while conducted in the name of a university, is a purely human construct and thus subject to all the perils, misunderstandings and failures that are a feature of human gatherings. This in turn meant that there was likely to be an element of inconsistency in the data, as the research involved individuals while most decisions were made in groups (there was no way in which the groups themselves could be interviewed – time and staff availability made this completely impossible). There was also the question of continuity as both the informants and the researcher were likely to in their understanding and interpretation of the circumstances from one interview to another. [Blau (1994) experienced the same inconsistency in his interview of university staff, albeit on other matters. Blau’s solution was to stagger his interviews across several months and to revisit informants several times – a solution that was simply not practical for this project.]
- The work also involved rhetorical research – essentially research into the communication between informants and the researcher. It would have been presumptuous to assume that the terminology used would convey the same meaning on each occasion, particularly when the variation in vocabulary from one institution to another was known in advance. Hence, all questions needed the potential to be asked in multiple forms and interpreted in a similar manner (Edwards & Holland 2013) (Seidman 2013).

These constraints made it necessary to focus on the domain of the research – a task considered vital as course accreditation can be perceived as a purely educational issue (essentially a review of the curriculum) or a legal matter involving compliance and legislation, as well as – or perhaps instead of - an administrative activity involving a series of sub-systems and protocols (Embley, Liddel & Tao 2011).

But what was the domain? Figure 10.4 illustrates this by a set of concentric rings. It was determined that the outer layer (the overlapping field within which the activity occurred) would be Higher Education Management – a discipline distinct from the hierarchic operations found in Business as academic managers depend on a willing co-operation between themselves and colleagues rather than the coercion of a superior found in elsewhere (Bess & Dee 2008).

The second ring was Risk, which in Higher Education is essentially “a regulated control of reputation” (King 2018) within which an institution is required not simply to protect its own good name (although this is important) but even more the reputation of peers across the sector (King 2009). All other risks (such as threats to life and property) are ultimately a threat to reputation, as failure to take these things in account provides evidence of poor management, and poor management in one institution withdraws confidence from them all (UK Higher Education Commission 2013).

The third ring involved Higher Education Systems, as course accreditation needed to be viewed as a multi-stage *system* that allowed risk management to be practiced as part of a coordinated procedure rather than a stand-alone activity (Schwarz & Westerheijden 2007). As a system, the process is independent of those who may be engaged in it. It cannot be changed at their whim or convenience. (Krotseng 2012).

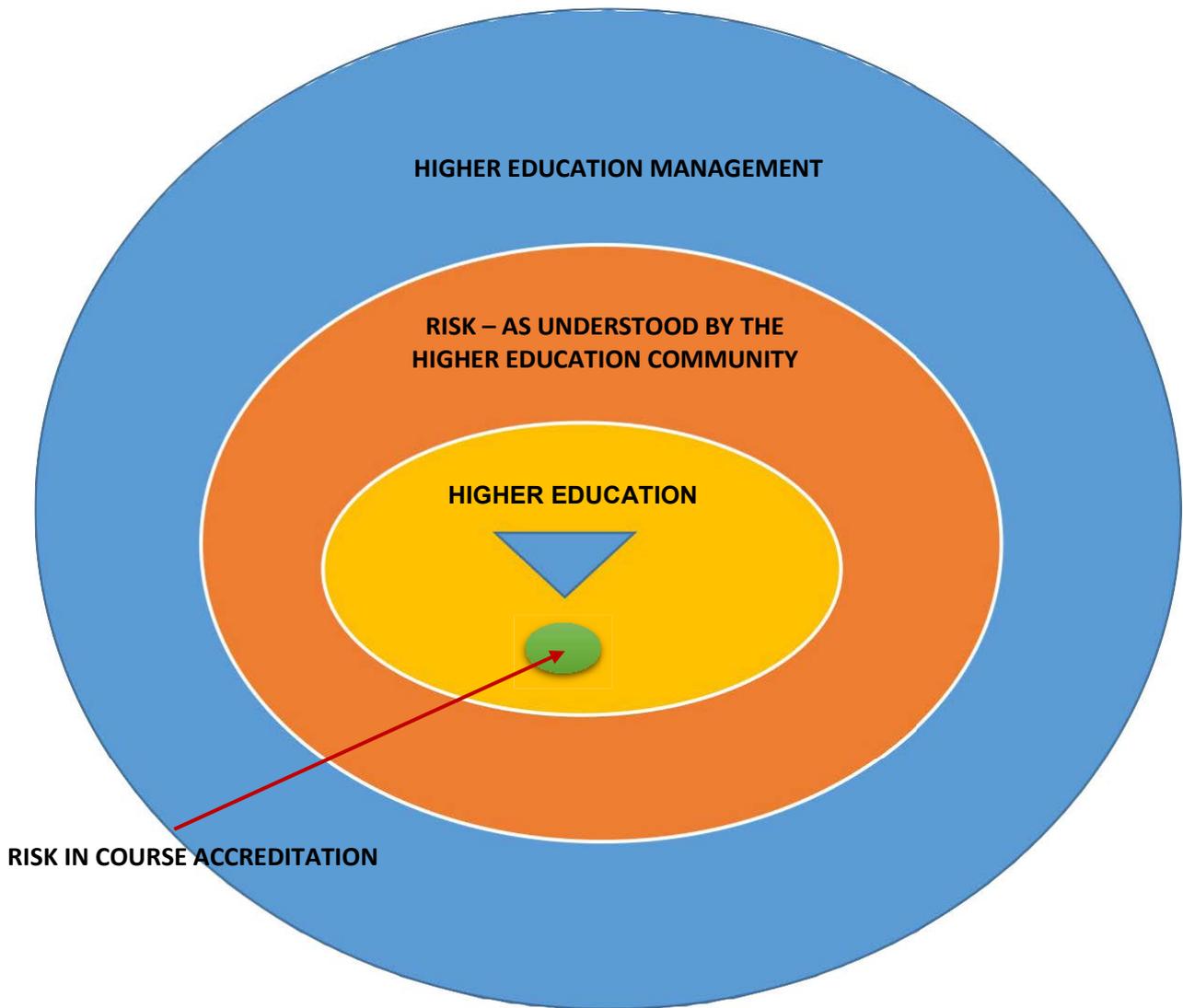


Figure 10.4 Establishing a Domain for the Research

## 10.4 The Domain of Higher Education

It seems beside the point to seek a definition of Higher Education or to explain the numerous features that distinguish this activity from other forms of post-secondary activity or commercial ventures such as training and coaching (Crowley & Williams 2008) It may be profitable, on the other hand, to make some comments on its management.

As explained in Chapter 2, there are several factors that differentiate the management of a university from other forms of commercial organization. The first is the fact that the leaders of a university have less control over their subordinates than their counterparts elsewhere. Academic skills reside within the scholar and are independent of the workplace, portable, and extremely difficult to replace. If academic leave they take their skills with them and this makes further work impossible (Alfred 2006). For this reason, everything that occurs should use persuasion rather than coercion - a factor that sets universities apart from other bodies in the corporate world (Bess & Dee 2009).

The second is that a university provides little more than the arena within which staff work and students learn. A university may make available the facilities, environment and administrative arrangements to facilitate these activities but, unlike an automated factory, can never be sufficient in itself to provide the learning or research needed to make it productive (Beckman, Bennett and Lockyer 2014). For that, staff with a high level of education are required, both as teachers and administrators.

The third factor is that there is ultimately no individual with total charge of a university. All Australian universities are controlled by a governing council, never by a single individual. This body, unlike the Directors of a company, is essentially a group of laypeople with a responsibility to account to Government for the management of the institution and is completely unable to deliver the outcomes expected from its own volition. For that it is required to employ others. While there is always a senior officer in charge of the day to day running (usually called a “Vice Chancellor”, and drawn almost exclusively from the academic community) he or she operates under the control of the governing body, exercising power by delegation and retaining it solely at their pleasure (Davis 2017).

Neither the Vice Chancellor nor the Governing Council can work without the willing cooperation of others, the great majority of whom could create extensive disruption if they withdrew their services. For this reason, a university operates in an atmosphere of (sometimes nominal) comradeship known as “collegiality”. At the same time, it is difficult to find examples of unfeigned collegiality in the management of a modern university (Kot 2009). This occurs through the fact that in a modern corporation there must always be a person to act as a defendant should legal action be pursued, a function that gives the person nominated an attributed rather than an actual source of power (Horne 1997). The fact remains, however, that most decisions in Australian universities are made on the recommendations of multi-person committees and are simply endorsed – rather than conceived – by the person on whom this responsibility is placed.

The fourth is the “not-for-profit” nature of Higher Education. While sound fiscal judgement is required to ensure that income keeps pace with expenditure, a university is not expected to make a profit or to make any attempt to repay its sponsors.

The fifth factor is the payback period – the time by which a return is expected. In the commercial world this is normally short term and immediate. This is not the case in Higher Education where the payback period may be measured in decades rather than fiscal quarters (Psacharopoulos 2014). This in turn means that the originators of an “investment strategy” (a term disliked by those working in Higher Education as it implies a mercenary attitude towards its activities – Kennerley 2018) are unlikely to be around when their investment matures and they may gain little fame or personal benefit as a consequence (Townsend 2014).

All of these separate Higher Education from other commercial activities. They are relevant to the risk management of this sphere which is markedly different from its counterpart in the commercial world.

The “micro-domain” to be examined was the interaction between risk management and course accreditation procedures. It is important to note that no attempt was made to investigate all aspects of course accreditation in Australian universities – a task that would take years, if in fact it could be completed in a lifetime – the work was to be confined to examining the influence of risk management on the course accreditation *procedures* of Australian universities. [The word “procedures” has been given emphasis, as it is the procedure – in other words the tasks staff are required to complete before a proposal can be approved. This narrows the work and separates it from other aspects of course accreditation, such as the development of curricula, the operation of committees, the quality of assessment or the maintenance of standards, all of which are important but far too lengthy for a single thesis. The “procedures” are the steps prescribed by the university – not all of which are published (and hence the need for interviews to fill gaps) but which are applied uniformly to each proposal].

Hence, the focus of the research was narrow. The question investigated was to be the relationship between the risk management practices of Australian universities and their course accreditation procedures. Put simply, all Australian universities have now been required by the Tertiary Education Quality and Standards Agency to develop systematic plans to combat risk. This risk can be of many types (an issue explored further in Chapter 2) but the question is not one of the *breadth* of risk but the development of plans through which these risks can be controlled (O'Connor & Moodie 2007)

This focus is summarised by the chart below [Figure 10.5] (based on a model provided by Kleimann & Klawitter 2017). The emphasis in this case involves the investigation of a broad topic (course accreditation) using the narrow lens of Risk Management

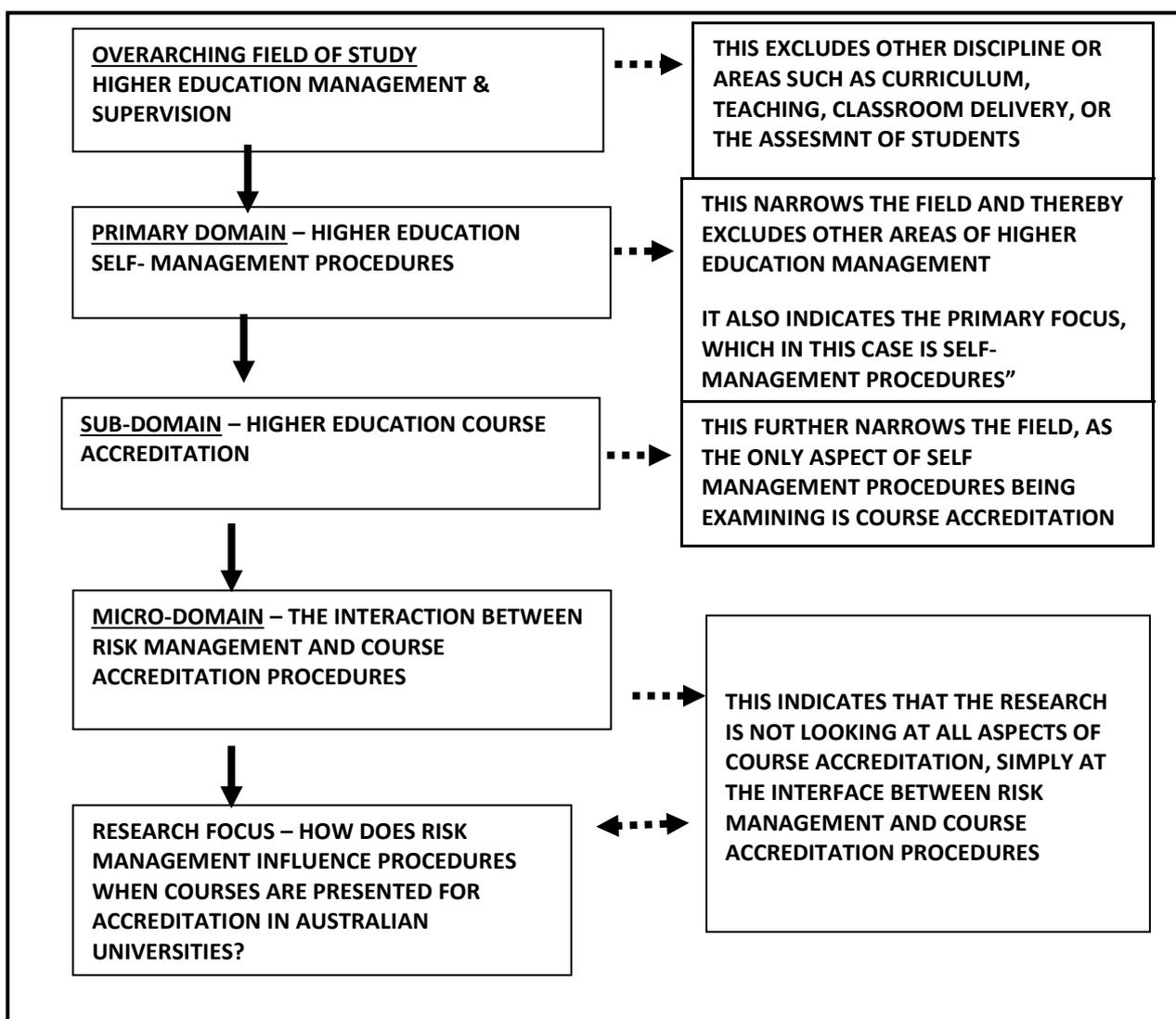


Figure 10.5 Focus of the Research

## 10.5 The development of a conceptual model within this framework

It is possible to develop numerous conceptual models within this framework as apertures through which to approach the research, although most of those considered were considered inadequate and subsequently deleted.

While there are many ways in which universities can be described (such as a “self-organized chaos” – Portugali 2012, or as “regulated anthills” – Bain 2015) it was felt that the best way to resolve the issue would be to regard universities as structural systems, that are made up in turn of smaller (but interconnected) sub-systems, with each dependent on even smaller or more intimate micro-systems within a fractal organizational framework (Hoverstadt 2011). Hence universities should be subject to the normal principles of systems analysis and viewed not as unity organisations but rather as “collectives” within which each contributes something towards the whole (Cutright 2001). While space precludes a detailed discussion of these systems, much less the way in which they are organised and integrated, it may be sufficient to state that the harmonious interlocking of each enables the intent of the institution as a whole to be achieved

This is particularly the case with course accreditation. The question of why universities go to the trouble and expense of accrediting their courses was discussed in Chapter 9 and will not be addressed here. It may perhaps be sufficient to note that course accreditation is viewed by most (if not by all) universities as an internal peer review process that has been established for the purposes of institutional self-assurance rather than external compliance and as such is subject to internal scrutiny only. Thus, course accreditation should be seen as a means for satisfying the internal requirements of the organization rather than being something imposed on universities by regulators. Indeed, the accreditation procedures of Australian Universities have long preceded the requirements of (and even now remains completely independent from) any external regulation (Forsyth 2014). Thus even if there was no requirement for the review of course proposals – which technically speaking there is not, as there is no mention of this in the enabling legislation of any Australian university - universities would almost certainly continue what they do at the present time, simply to maintain the confidence of the academic community (Craft 2018).

Course accreditation was therefore viewed as a system and investigated using the tools of systems analysis. Systems Analysis involves an examination of interrelationships – of the manner in which a range of factors interact to achieve a desired outcome (Bowman 2003). It is difficult to describe the reaction of all components at once, particularly when all are active and interposing on each other at the same time. It is normal practice to reduce the number of “actors” as much as possible, and to view the collision between each as single incidents, despite the fact that they are likely to be occurring within a larger arena, with much else going on around them (Burch 1992). It is also a matter of convention to regard one of these components as stable and stationary (and hence passive, immovable and consistent) while the other is active, mobile and disruptive. In such a conceptual model it is assumed that the passive component would have remained unchanged had it not been impacted upon by its active counterpart (Kelkar 2004).

In the conceptual model constructed for this thesis, course accreditation was regarded as the passive component – stable, long lasting and essentially unchanging. Risk Management was regarded as the disrupter to spoil this tranquillity.

There were nine areas to be explored to understand the collision between risk management and course accreditation. All nine of these were used to shape the project and produce the outcome. (Taken with expansion from Ansell & Whatron 1992):

- The boundaries, and any limitations these boundaries may impose. Course accreditation is clearly defined by the universities and extends from the point where a concept is proposed to the first lecture – or in some cases to the point where approval expires or the program is terminated. Risk management is less clearly defined, and may include only known or easily foreseeable threats, or it may involve risks of all kinds, no matter how unlikely or remote
- The duration of contact. Unlike course accreditation, risk management is not a single entity and comes in many facets. There can be a multitude of risks, some of which have a greater probability – or extend for a longer period of time with more serious consequences – than others. Those risks that are transitory or infrequent are likely to have a lesser effect than those that are frequent and constant
- The breadth of the problem. All Australian universities have clearly defined course accreditation procedures, which while differing from one institution to another have sufficient commonalities to be approached as a single entity. A sector wide survey was chosen because of the unexplored nature of this field, even if this risked the loss of fine detail.
- The scope of the problem. The ultimate purpose of the investigation was not simply to examine the interaction or risk management with course accreditation as an academic exercise

but to give a deeper understanding of the accreditation practice itself across the sector. For this reason the emphasis was on the practical rather than the theoretic aspects of this interaction.

- The consequence if risk is ignored. In some cases the possibility of risk – or the outcome should it occur – is so small that it can be safely ignored, and this is done by most institutions. In other situations the outcome may be catastrophic. It was necessary to determine where the balance lay between these two.
- The risk appetite of the institution. All activity involves risk, although in certain circumstances an institution may be more prepared to expose itself to greater danger than in others. The reasons for this required investigation
- Those responsible for identifying and managing risk. The staff responsible for course accreditation are clearly defined in most universities. This is less the case with risk, particularly if the institution starts with an ill-defined conception of what it is protecting itself against. The question of who might be responsible for risk, particularly in course accreditation, required clarification
- Risk as a driver for change in procedures. While course accreditation is assumed to be stationary for the purpose of this model, it remains in a state of constant change. The question to be addressed was how much of this change is driven by the presence of risk, and whether this is in fact recognized by those engaged in the change management process
- The role of external agencies, particularly TEQSA. TEQSA focuses heavily on risk, although whether this is risk to the sector (or possibly risk to the government) rather than risk to individual providers may be moot. The question to be addressed, however, is whether this influence was in fact significant, or whether, as some informants subsequently suggested, TEQSA is simply a bogymen used by management to frighten staff.

One difficulty in the preparation of a conceptual model was uncertainty about what the universities meant by “Risk”. A term widely used in documentation but rarely defined. It was considered essential, however, to distinguish clearly between Risk as a force and its consequences as an effect.

This made it necessary for the researcher to consider course accreditation as an exercise in risk sentience. The word “Sentience” is widely used in Biology and Psychology (and increasingly by analogy in Business and Risk Management) to mean “self-awareness” or “mental consciousness” (Grossenger 2012). Thus a person whose mental functions are operating in a responsible manner is said to be “sentient”. This means that the person is aware of what they are doing, can think for themselves, can anticipate future consequences and can be held accountable for their actions. Essentially sentience – at least in human beings - is the ability to be aware of one’s environmental situation, to be able to reason logically, to learn from mistakes and to perceive (and be responsive to) the feelings of others This has a parallel with the “sentience of organizations”, an anthropism that can be traced back at least as far as Miller and Rice (1967) and which has since been used to explain many otherwise uncertain aspects of Organizational Theory (Ratzesverger & Sawhney 2017) (Selvaseelan 2018). The question that needs to be asked is whether it is possible to construct a conceptual model of course accreditation through the lens of Risk Sentience.

This is not as easy as it sounds. As Selvaseelan (2018) reminds us, there is no universally accepted definition of Risk Sentience, and as a consequence the term can be both misused and misunderstood. When reduced to its simplest form Risk Sentience becomes little more than an exercise in “gut

feeling” – intuition if one likes – rather than a form of logical reasoning. At the same time it needs to be clearly distinguished from mere risk anticipation:

The Theory of Risk-Sentience proposes that while risk perception is the subjective judgment that people make about the characteristics and severity of a risk, risk-sentience refers to the more primal and rudimentary feeling limited to merely sensing possibility of an uncertainty to develop into the status of a future risk. It is thus proposed that risk-sentience is the innate precursor of risk perception. (Selvaseelan 2018) [Emphasis added for clarity]

An example may make this clear. A person finds it necessary to walk through a dark and dingy laneway late at night. There may be nothing to fear – the route may be perfectly safe and the journey completed without any incident whatsoever. Despite this, because dark and lonely places are associated with danger the traveller is likely to have a greater expectation of risk than they might on a broad and well lit highway, or even in the same laneway at noon. It is the “sentience” (the person’s appreciation of the situation in which they are placed) that heightens the senses and makes them more conscious of the dangers they run (Kyrtsis 2007).

Most universities – in Australia and overseas - operate in an atmosphere of risk sentience (Zaaiman 2017). This makes universities conservative in nature, with a sense of caution that governs all aspects of their operation, and which distinguishes them from “for profit” commercial ventures where there is a greater emphasis on entrepreneurship (Archibald & Feldman 2017).

For this reason most university systems contain built in mechanisms to prevent “enthusiasts” from taking hasty action that may damage the institution (McGettigan 2013). This may require that they gain a second signature for approvals or that there be a cooling off period between the signing of a document and its implementation (Viegas 1986).

While such a conceptual model was attractive, its application to the real world revealed a number of deficiencies.

- The assumption behind a model based on risk sentience is that course accreditation – in common with most university procedures – should be stable and invariable, with little change over many years, as change in itself involves risk. In reality the very opposite is true, with accreditation procedures changing rapidly as universities face new challenges and as the demand of regulators becomes greater. Rather than being sedentary, course accreditation has become one of the least stable elements in academia (UNESCO 2006)
- While there can be no question of the caution exercised by those responsible for the approval of courses and subjects, most of this hesitancy appears to be based on the uncertainty of risk rather than a fear of its consequences (van Asselt & Vos 2007). The model suggests that it is the atmosphere or apprehension of risk that inhibits action. In reality it would appear to be the uncertainty of risk (which may or may not exist) that governs the actions of decision makers rather than simply an acknowledgement of its presence. For this reason approval is often given despite the possibility of the unexpected occurring – frequently with a knowledge that because of the unpredictability of risk the problems feared may never arise (CDE 2017)
- The further objection comes from the fact that risk sentience demands at least a subconscious awareness that risk exists – the risk itself may be ill defined but its existence is not. If there is no awareness of risk, risk sentience does not apply (Crowe & Horn 1967) The assumption, if a risk sentience model is used, is that those assessing course proposals are fully aware that risks exist and exercise appropriate caution to prevent their occurrence. This may not be the

case, particularly if those involved are inappropriately trained or inadequately orientated to their task.

- The ultimate objection to this model is the fact that risk sentience relies heavily on past experience. Participants become aware that risk exists through incidents in the past that were either undergone personally or were gained through the vicarious experience of others (Coyle 2004). Risk sentience breaks down when new and unexpected threats appear, simply because the sense of danger is missing (North 2001). This in turn makes it less appropriate as a conceptual model.

Risk sentience can be used, however, if tempered with Senge's Fifth Discipline

Peter Senge's books "*The Fifth Discipline: The Art and Practice of the Learning Organization*" (1990) and "*The Fifth Discipline Fieldbook : Strategies and Tools for Building a Learning Organization*" (1994) seek to explain how "learning organizations" structure themselves and conduct their business. [A "learning organization" is a body that constantly seeks to learn from its past, particularly from past mistakes. A "learning organization" need not be as tightly organized as a commercial entity - churches, charity groups, sporting teams or even groups of individuals that meet regularly for some common purpose, such as a political party or a chess club, can also be regarded as a "learning organization", as are universities. The common unifying factor is that each, irrespective of its purpose, must be willing to benefit from its experiences, and to use its past successes and failures to improve its self-esteem as well as its place in the world (Mason 2018)].

Senge suggests that there are five disciplines that must be mastered before a "body" (a word used here in its widest sense of any group assembled for a specific purpose) can be considered a "learning organization":

#### 1. Systems Thinking

Essentially Systems Thinking is the ability to view the organization as a whole rather than simply a collection of parts, and to note its place in the wider world. (Senge 1990 page 10). Systems Thinking involves System Dynamics, and it is only the latter that can be seen by external observers, with system dynamics – the outcome from the workings of the system - being the visible proof that systems thinking is in operation (Dangerfield 2014). A football team, for example, is required to function as a single body, with each player supporting his colleagues even if this diminishes the individual's chance of personal glory. Such a team will quickly defeat a group of "legendary players", each of which might well be a champion of the sport in their own right, but who perform as individuals rather than as members of a squad. Spectators – as external observers in the stands – cannot see the "systems thinking" that operates in the mind of the team as the game is played – all they can see is the "system dynamics" portrayed through activity and outcome on the field. In the same way it is extremely difficult to confirm the presence of "Systems Thinking" in a university – it may, however, be possible to track it (as seen for example in its effect on university procedures) by noting what emerges through system dynamics (Gilbraith 1998).

There are two problems, however. The first is that it is possible to get a "pseudo-dynamic" that arises from habit rather than intention. (Thus, an institution in confirming that all the boxes are ticked before accepting an application, but this may be governed solely by long established practice rather than rational thought or deliberate action). Pseudo-Dynamic action can be extremely misleading in Higher Education, where organizations can appear to be busy, diligent and rigorous – and may themselves believe that such frenzied activity is a sign of excellence - but whose actions are purely repetitive, done without thought and contributing little (Neave 2006).

The second is a risk of confusing “Systems Thinking” with “Systems Operation”. Systems thinking is essentially an attitude – a way of thinking about the world and the interaction between the various actors within it, while systems operation involves its application and outcome (Meadows 2008). It is possible to blunder into success, and for this reason a successful outcome may be inadvertent rather than the result of a procedure. Take for example the action of a doctor who through carelessness misdiagnoses a patient’s condition. The doctor prescribes a medicine which by pure chance effects a cure. It might appear to external observers that the “systems operation” (the treatment of the patient) was based on sound reasoning (in other words on effective Systems Thinking) without realising that what was achieved occurred by accident rather than design. For this reason the effectiveness of systems operation – the way in which systems thinking is put into operation - can never be taken as proof of the existence of Systems Thinking (Matthews 2004) [“System Dynamics” should be seen as the link between “Systems Thinking” and “Systems Operation” (Caulfield & Maj 2001)].

Both of these – the presence of “pseudo-dynamics” or the apparent success of systems operation in isolation from systems thinking – can occur in “Learning Organizations”, particularly in universities (Nakpodia 2009).

The test to eliminate these phantoms (pseudo-dynamics and thoughtless “systems operation”) is whether the organization has gained mastery over “Dynamic Complexity” (Adams et al.2009). Mastery over Dynamic Complexity assumes that the organization has the ability to come to terms with each of the factors that affects its operation, even though in the normal course of business it may rarely need to do so. The test of whether an organization has equivalent mastery over itself and its environment rests on its ability to interrupt its normal activities and intervene in whatever may be going wrong as soon as required – similar to the intervention required from a pilot to recover from the emergencies that arise during a flight (Pffaeing 2014).

It is important to avoid confusing “Detail Complexity” with “Dynamic Complexity”. Detail Complexity occurs where there are so many variables that they overcrowd the mind, confuse the organization, and quickly become unmanageable. Dynamic Complexity, on the other hand, implies an inbuilt filter or a system of prioritisation to ensure that the most serious problems are handled first, with the others deferred until time and capacity are available (Gilpin & Murphy 2008). As will be discussed shortly, both of these can arise in the risk management of course accreditation.

## 2. Personal Mastery

Senge’s second discipline is “Personal Mastery”. This means that a group or organization must be committed to life-long learning and be prepared to profit from both its mistakes and successes (Beer 1981). Personal Mastery is grounded in self-discipline (Dihman 2017) and the test of this is restraint (Morato 2013). This in turn means that an organization needs to choose whether it will react or not, irrespective of the reality or imminence of the threat (Courtney, Lovallo & Clarke 2013). The fact that an organization chooses not to act when others in a similar situation might strike out blindly may well be the best indication of personal mastery (Duckworth, Gendler & Gross 2017)

Personal Mastery is achieved by developing proficiency, both learning from one’s own mistakes and noting the successes and failures of others (Senge 1990). It is important to note, however, that learning from others rarely means a replication of their behaviour. What organizations are required to do is to note the thinking behind a particular strategy and its application under a strict set of conditions, in an attempt to imitate their thinking, rather than simply to copy their actions (Sutton 2007) (Spender 2014). Essentially this involves the use of others as mentors or role models, noting the reasons for their actions as opposed to the actions themselves (Hattie & Donoghue 2016)

Personal Mastery, in the sense of self-restraint - or possibly the ability “to look the other way, similar to Nelson’s blind eye” (Coleman 2002) - is an important aspect of Higher Education Management, and the influence of this strategy on conceptual models of risk management was considered important

### 3. Mental Modelling

Senge’s third discipline is mental modelling, and this is essentially the ability to predict the outcome of future actions before doing anything further. These mental models are grounded in probability rather than certainty, and can never make perfect forecasts.

The third discipline must therefore be taken into account with its two predecessors, Systems Thinking and Personal Mastery (or more accurately Personal Restraint) to suggest possibilities rather than reliable accuracies.

Mental modelling as Senge explains it is not quite the same as the conceptual modelling that is mentioned here. Mental modelling, as far as Senge is concerned, involves sequential thinking – the logic of the columns in a financial balance sheet – rather than simply a projection of alternatives (Serman 2000). The difference lies in what is rejected. In Senge’s form of mental modelling, only those things are accepted that are in accord with the five disciplines of his schema. (*The first three have already been mentioned, the others are Shared Vision and Team Learning*). All else must be excluded. In conceptual modelling, on the other hand, everything must be accepted until it can be positively eliminated as misleading, deceptive or misappropriate (Young 2008)

### 4 & 5 Shared Vision and Team Learning

Senge’s last two disciplines are “Shared Vision” and “Team Learning”. As both are complementary to each other it may be best to deal with them both in the one section, at least as far as conceptual modelling is concerned.

Shared Vision (according to Senge 1990) is a sub-set of “Total Insight”. Total insight is the sum total of a person’s (or more accurately in this context, an organization’s) understanding of something in the external world. “Understanding” in this context means the original stimuli or evidence **plus** whatever interpretation may be placed upon this by the observer. This definition of “Total Insight” – which is “total” to the person not the situation, is used by writers simply so that it can be broken into smaller parts, one of which is “Shared Vision”, a term that Senge adapted but did not invent – it was previously used for mutual agreement (Parker 1990).

Total Insight is broken into two components by Senge – “Mental Models” and “Shared Vision”, with the first shaping the second. The “Mental Model” is the structure developed in the mind as an explanation for what is observed. “Shared Vision” is that part of the explanation or model in the observer’s mind that is shared with others (Senge 1990).

Take for example a patient with an incurable disease. The patient may have come to terms with the ultimate inevitably – in other words he has created a “mental model” of his condition and what is likely to happen in the future - but may decide not to reveal everything to his wife lest it cause further distress. The patient is aware of what normally occurs and to the limit of his understanding - he makes no claim to know everything about the disease – can predict further deterioration to the point of death. The partial information given to his wife, on the other hand, forms their “shared vision” of this “mental model”, possibly implying false hope that he may yet recover. [The example is chosen deliberately as “Mental Models” and “Shared Visions” are normally associated with pleasant and desirable things, such as the promise of future happiness and prosperity. As the example shows, this need not be the case – mental models and shared visions can relate equally to undesirable outcomes. Nor is this a case of the invalid telling lies, something that is foreign to Senge’s thinking. It is rather a

matter of telling the truth, but not the whole truth, thus withholding part to improve the message. This is something that is not unknown in Higher Education either–Craig 2015)]

Shared Vision gives rise to Team Learning, whereby the lessons learnt personally from experience or shared by others in the group are applied in the workplace. Team Learning is in fact a reciprocal process, with the “teacher” gaining as much (or perhaps even more) than the so called “pupil” in an atmosphere of mutual benefit (Senge 2014). The end result is improvement – errors that were made in the past are not repeated, and strategies that were successful elsewhere are made part of the daily practice. The end result, particularly in Higher Education, is a “Learning Organization” (Bui 2010)

A tentative relationship between Senge’s “Fifth Discipline” and “Risk Management in Course Accreditation” is given in the diagram that occurs later in this section. At the same time, this relationship is not perfect, and is dependent on five assumptions, the absence of any one of which would cast doubts on its validity.

- It is assumed that course accreditation is in fact a “system” rather than a “ritual”. A system has a defined and deliberate structure that may be constantly amended or improved to meet emerging needs – indeed it is the frequency of amendment that distinguishes one from the other, as the essence of a ritual lies in the fact that it rarely changes, irrespective of what may be happening in the world around it (Koster 2001). Thus in Higher Education, graduation ceremonies are essentially a ritual, as every effort is made to keep them consistent with past tradition. Teaching and Learning, on the other hand, is a “system”, where every effort is made to shake off the old where necessary and introduce improvements. If course accreditation is a ritual rather than a system, Senge’s principles cannot be applied.
- It is assumed that course accreditation is an exercise in “Institutional Mastery” (the term “Personal Mastery” – although the one used by Senge – is a personification, and likely to be misleading). This means that the “institution” – either the whole or some active part within it – imposes its own self-discipline over what is done, and seeks through this to facilitate improvement by developing proficiency – in other words to learn from its successes and failures (Branson, Marra, Franken & Penny 2018). This in turn assumes three things; (adapted with modification from Chance 2009)
  - a. That the institution knows what it wants to achieve from the process, and that all participants are aware of this expectation and share the same aspiration.
  - b. That improvement is desirable – essentially that there is a current standard (in sport this would be called a “personal best time”) that is known to the institution and which it is possible, realistic and desirable to exceed.
  - c. That there are appropriate benchmarks to measure progress. While these need not be numeric (some things such as values, esteem or goodwill simply cannot be converted readily to figures) there must be some objective way to measure improvement that is independent from mere gut feeling.
- These things need not be self-initiated to be valid. Institutional Mastery can be imposed from an external source (similar to a rebellious child being taught self-discipline, or a higher education provider learning self-discipline from a regulator) or it can be developed internally. The key point is that self-discipline – the sign of self-mastery – exists in practice, rather than simply its source. (Sherman 2014)

- It is assumed that the institution has a “mental model” of what it is seeking, and that this is clear and communicable. In the case of course accreditation this means that the institution (or at least those within the institution charged with this responsibility) have a clear mental image of some “ideal” course or subject against which the proposals brought forward for approval can be compared. [It may not be possible for the institution to offer such “ideal” courses incidentally, possibly on the grounds of cost, staff shortage, equipment short fall, the duration of awards, the wishes of students, and so on, but this “ideal” is what the institution would prefer to provide in an otherwise unrestricted world. The course that is actually approved, while falling far short of this, is therefore a compromise between what is desirable and what is achievable. At the same time, this does not detract from the existence of an “ideal course” as the mental model against which comparisons can be made (Pechar 2004)]
- It is assumed that there is a “shared vision” of what the institution is seeking to achieve, and that this is actively communicated by decision makers (Senge 1990). This communication is not confined to a restricted circle and may in fact form part of the mission statement of the university. The key issue is that most if not all within the organization should be aware of what their colleagues – and ultimately, they themselves – should be seeking to achieve, and are persuaded thereby to contribute towards it (Thornhill, Lewis & Saunders 1995)
- It is also assumed that there will be team learning (Senge’s Fifth Discipline). Team learning in turn implies a constant review of progress and a quest for permanent improvement (Hariharan 2014). This can be frustrated by an excessive turnover of staff

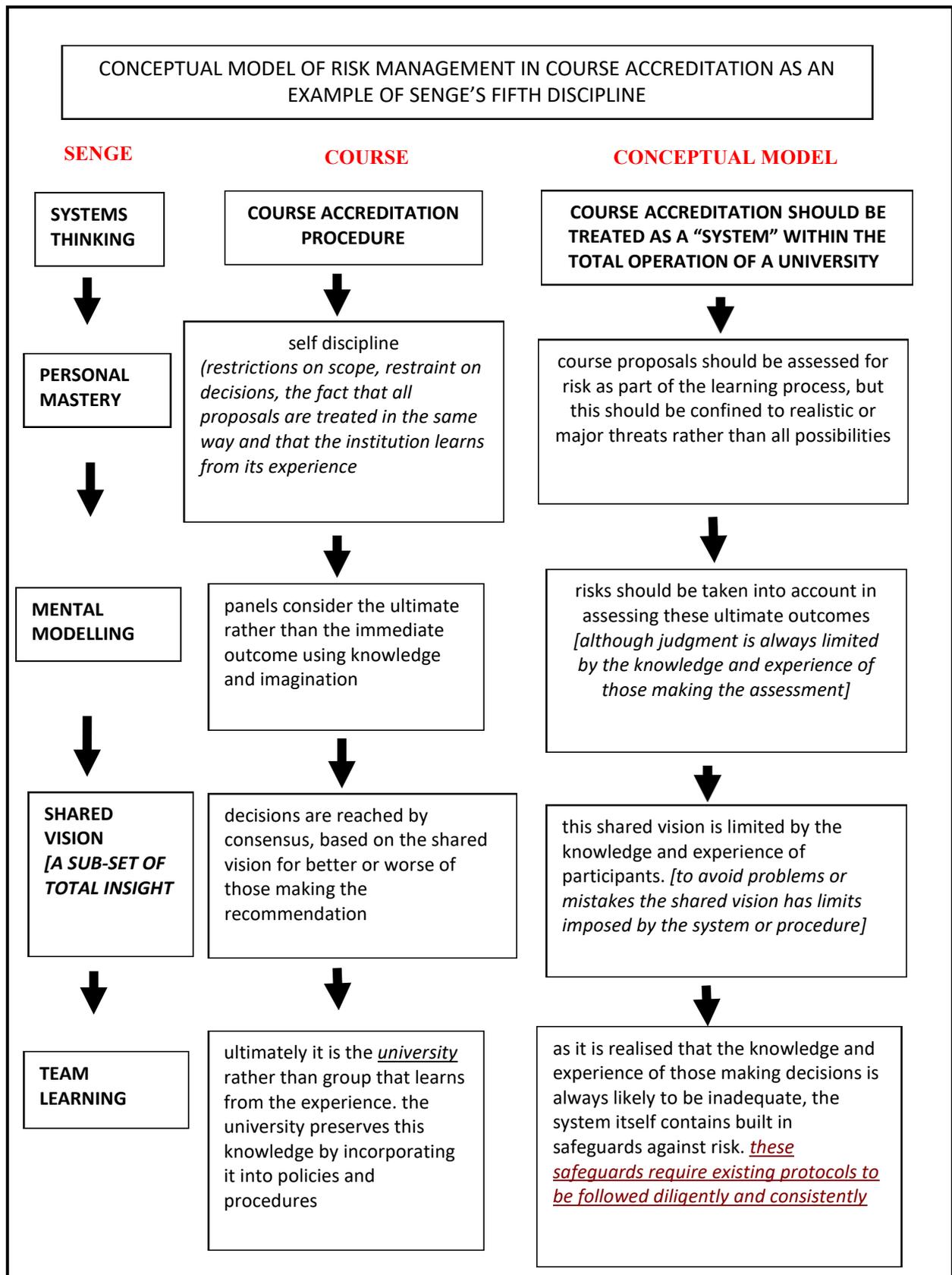


Figure 10.6 Conceptual Model as an example of Senge's fifth discipline

It seemed that subject to these limitations, a conceptual model based on risk-sentience tempered by Senge’s Fifth Discipline might be possible, as shown by Figures 10.7 and 10.8.

CONCEPT	EVIDENCE	CONCLUSION
<p>Course accreditation as an exercise in risk sentience</p>	<p>Risk sentience involves an awareness of the potential for risk, even if the details of the risk itself remain uncertain.</p> <p>There appears to be little doubt from the material published by universities that these bodies are aware of the potential for risk, and will do everything possible to avoid it</p> <p>In course accreditation this presents a conflict between caution and innovation, or more realistically between individuals <i>[who downplay risks]</i> and the system <i>[which may treat all risks as significant threats]</i></p> <p>This conflict is mitigated through the establishment of “risk recognition” procedures <i>(such as a need prescribed by policy to always do something, or alternatively to never do something else)</i> thus overriding both staff exuberance and institutional caution</p>	<p>Universities are aware that risk is inherent in courses (as in all tertiary operations), although the actual risks vary from one case to another and are rarely delineated.</p> <p>Universities expect specific risks to be identified by decision makers, but because of the inadequate training given to decision makers in risk management their judgment may not always be sufficient or may be misplaced.</p> <p>To avoid this, universities provide a set of general principles that decision makers are obliged to follow unless a variation can be justified.</p> <p>As it cannot be guaranteed that decision makers will be aware of these rules, they are normally enshrined in the procedures that control the environment within which decisions are made. these protocols do not identify specific risk but make certain that appropriate measures will be taken to counter them</p>

**Figure 10.7 Course Accreditation as an Exercise in Risk Sentience**

CONCEPT	EVIDENCE	CONCLUSION
<p>Risk management in course accreditation as an example of SINGE's fifth discipline</p>	<p>Senge's fifth discipline involves an ability to view the organization as a whole rather than as a collection of parts.</p> <p>This in turn means that course accreditation should be seen through the lens of systems thinking as an exercise in operational dynamics in which the institution demonstrates its mastery over dynamic complexity.</p> <p>While this is frequently acknowledged in the documentation produced by universities, in practice many stages of the accreditation process appear isolated – if not quarantined – from each other, with each group doing something specific and individual.</p> <p>This is particularly the case with administrative versus academic practice and the interface and consistency between various groups.</p> <p>The fact that universities appear to view the accreditation process as a single entity, and yet allow it to be done as a series of separate (indeed quasi-independent) stages presented an anomaly that required further explanation, particularly the issue of whether risk management applied solely to a part, or to the process as a whole.</p>	<p>Senge (1990 and 1994) provides an alternative way of looking at the influence of risk management on course accreditation procedures in Australian universities</p> <p>To Senge, all business operations, (including, one assumes, both university and course accreditation) form part of a learning process in which organizations learn from their past mistakes. One questions, however, whether this does in fact occur as a deliberate strategy in course accreditation.</p> <p><i>Despite this, Senge's emphasis on "shared vision" and on "team learning" is in fact valuable, as is his insistence on systems thinking as a "whole of institutional" process.</i></p> <p><i>For this reason, while Senge's methods cannot be used as a panacea, they provided a valuable insight and could not be disregarded.</i></p>

**Figure 10.8 Risk Management as an Example of Senge's Fifth Discipline**

The two primary concepts on which the conceptual model was drawn are shown in Figure 10.9

Course Accreditation is an exercise in risk-sentience	Universities operate in an atmosphere of risk-sentience (even if the risk itself is poorly defined). To avoid disruption, they operate with deliberate caution. Course accreditation procedures are a reflection of this apprehension.
Risk management in course accreditation as an example of Singe's fifth discipline	Singe's fifth discipline involves the ability to view organisational systems as a whole rather than simply as a collection of parts. Thus, course accreditation should be seen as an exercise in systems dynamics within which the institution gains mastery over risk through effective co-ordination.

**Figure 10.9 Primary Concepts of the Conceptual Model**

This led to the final conceptual model, Figure 10.10.

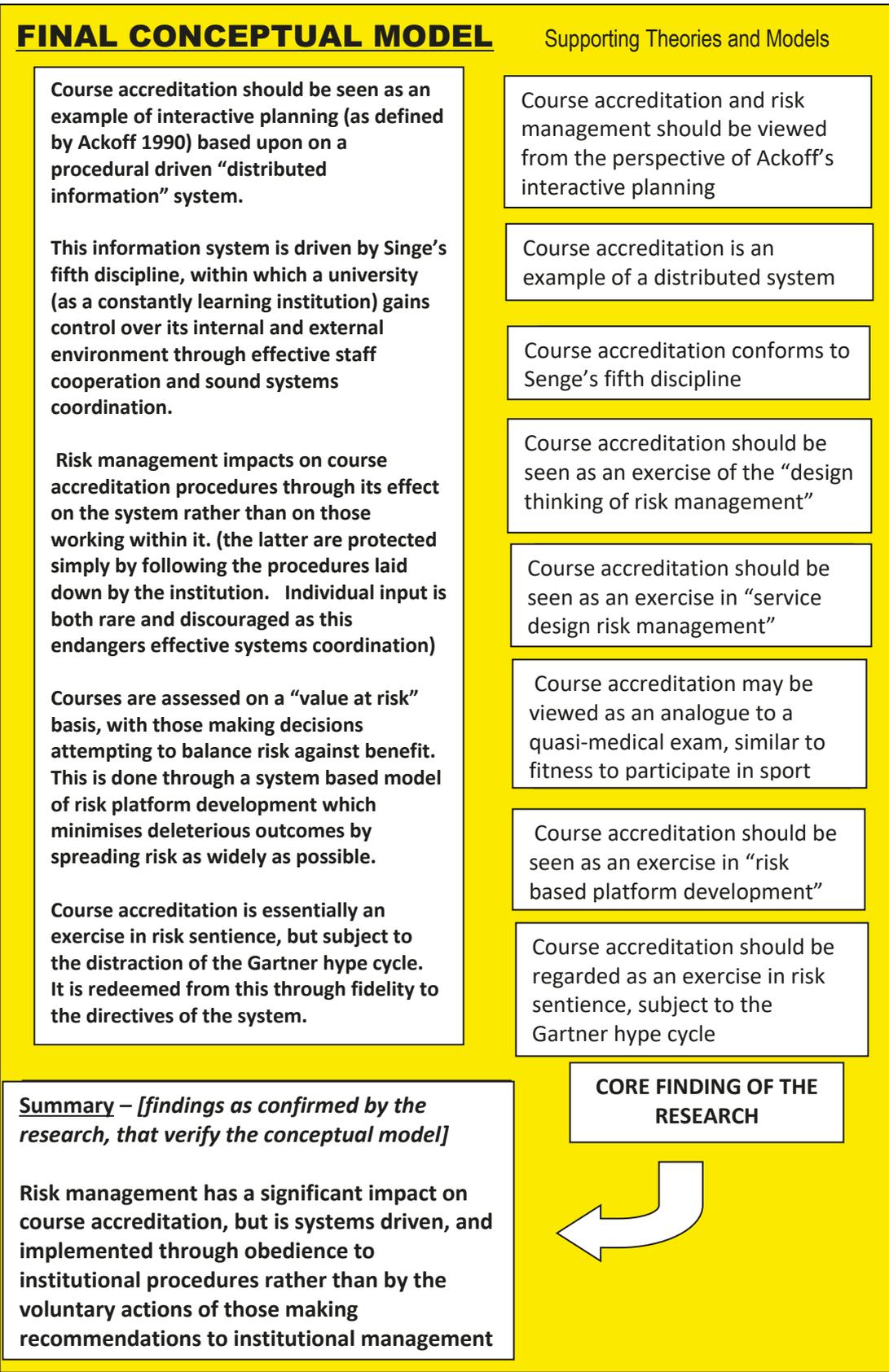


Figure 10.10 Final Conceptual Model

## 10.6 The application of the conceptual model

The conceptual model was applied in two stages. The first was after documentary material had been assessed and analysed but before the questions to informants were finalised. Within this framework course accreditation was seen as an exercise in risk sentience where institutions were aware that risk existed (even if some risks remained unknown) and were anxious to do everything possible to avoid or neutralise their occurrence. This in turn shaped the questions needed to fill gaps.

The second stage occurred when the time came to analyse the data collected. While there were several themes in the data (as explained in Chapters 8 and 9) the most significant appeared to be an intent by the institution to learn and gain benefit from the experience. For this reason, the response from informants was assessed through the lens of Senge's Fifth Discipline, where Course Accreditation was seen as an exercise in Systems Dynamics, through which the institution gained mastery over risk through effective co-ordination of its systems rather than its personnel. Hence, it was the "system" that provided protection, not (as in other industries such as transport or fire fighting) the skill by those charged with the avoidance of risk.

Universities have a long life and readily survive both their members and their failings (Barnett 2000). This is done through the use of systems, and it is these systems that give life to the institution rather than those responsible for their implementation (Okechukwu 2011). Australian Higher Education is particularly "systems driven", not simply in its administrative practices (although this is where most envisage the use of systems most readily) but even more in its teaching and learning, where tactics that have proven successful are replicated to the point of becoming habitual – not applied unthinkingly but once used successfully applied time and again to achieve an equivalent outcome (Clark 1983).

Course accreditation is neither a habit nor a ritual, but it involves major replication, as once a satisfactory pathway is found there are few who are prepared to deviate from it. Risk is rarely in the minds of those responsible for avoiding it, but provided the system is followed all will be well

## 10.7 CONCLUSION

Course Accreditation is an important aspect of Higher Education management, and as such deserves further investigation as both an academic and an administrative activity. There have been few if any studies of the inner workings of Australian universities, and it is hoped that the task that has been done will open the door to a more thorough examination of how Australian universities conduct their business and meet their obligations to the community.

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## Appendix A – TEQSA Threshold Standards

Informants advised that TEQSA required evidence that:

- 5.1.1 There are processes for *[the]* internal accreditation of all courses of study leading to an Australian Higher Education Qualification
- 5.1.2 Course approval and self accreditation processes are overseen by peak institutional academic governance processes and they are applied consistently to all courses of study, before the courses are first offered and during re approval or re accreditation of the courses
- 5.1.3 The course of study is approved or accredited...only when
- 5.1.3a The course of study meets, and continues to meet, the applicable Standards of the Higher Education Standards Framework
- 5.1.3b The decision to (re)approve or (re) accredit a course of study is informed by overarching academic scrutiny of the course of study that is competent to assess the design, delivery and assessment of the course of study independently of the staff directly involved in those associated in those aspects of the course
- and
- 5.1.3c The resources required to deliver the course as approved or accredited will be available when needed.

Informants also advised that TEQSA (2014b) requires evidence that:

- 5.3.1 All accredited courses of study are subject to periodic (at least every seven years) comprehensive reviews that are overseen by peak academic governance processes and include external referencing or other benchmarking activities.
- 5.3.2 A comprehensive review includes the design and content of each course of study, the expected learning outcomes, the methods for assessment of those outcomes, the extent of students' achievement of learning outcomes, and also takes account of emerging developments in the field of education, modes of delivery, the changing needs of students and identified risks to the quality of the course of study.

Informants suggested that for this reason that the vast majority of Australian universities revised their procedural documents (if not their practice) in 2016 to bring them into line with TEQSA requirements.

## APPENDIX B – TEQSA Guidance Note: Course Approval, Design and Delivery 22<sup>ND</sup> October 2013

### Overview

The Provider Course Accreditation Standards (CAS) apply to all higher education providers. Providers with self-accrediting authority accredit their own courses and in doing so, their corporate and academic governing bodies ensure that the courses meet the Standards before they are offered, and without reference to TEQSA. The corporate and academic governing bodies of other providers are responsible for ensuring that course proposals meet the Standards before they are sent to TEQSA for accreditation.

TEQSA will validate the effectiveness of each provider's overall course approval processes and decisions at the time of registration or renewal of registration. The extent to which a provider can achieve and maintain academic quality will in large measure depend on the robustness of its course approval processes.

This Note provides guidance on how providers might demonstrate that they meet selected Standards relating to course approval, as well as those relating to course design and delivery, with a particular emphasis on issues that in TEQSA's experience recur relatively often in applications for course accreditation from providers without self-accrediting authority.

### Course approval processes

Course approval processes (as well as structures) vary between providers and the Threshold Standards do not prescribe particular processes.

However, there are a number of common features of successful processes that contribute to good decision-making and build confidence in the decision-making process, some of which are prescribed in the Standards. TEQSA will seek evidence that these are in place and operating effectively:

*Policy and Procedures Framework.* A course approval framework will reflect the scale of the provider's higher education operations and its course delivery models. TEQSA would expect to find policies and procedures in place for the development, review and approval of a provider's new and existing courses of study. The framework would outline the relevant policies, procedures and forms, including: course documentation; the criteria for approval of course proposals; the stages of course development; and the relevant staff and committees with course development and course review responsibilities.

*Path of approval.* In smaller providers, after approval by the relevant academic manager, proposals are likely to be put straight to the academic governing body. In larger providers that are sub-divided into faculties or other academic units, scrutiny will usually be undertaken by faculty or department boards composed of academics in the broad field of education, before the consideration by the main academic governing body. All these bodies should receive the same course documentation as detailed above.

*Allocation of responsibilities.* The responsible academic manager, and department or faculty (if applicable) should be clearly identified. The proponent should either have experience in course design (as well as in the relevant discipline), or should have access to course design expertise.

*External input.* External advisors should provide active input into each course proposal, usually through a course advisory committee or equivalent. A Course Advisory Committee can have either an ongoing function or be created by the academic governing body to oversee development of a specific course proposal. The membership of a committee should include representation from the relevant industry or profession and senior external academic(s) with current knowledge of the discipline. The more responsive the provider is to this input, and the more evident this is in the minutes of committee

deliberations, the more likely the course will meet the Threshold Standards and meet student and employer needs.

*Course review.* TEQSA would expect to find provision for a cycle of periodic review following approval of a course, and evidence of active implementation in the case of existing courses. This is discussed in detail in TEQSA's Guidance Note on Quality Assurance. The cycle of review should ensure that the course is updated whenever required, and should provide for a major course review in the period leading up to the next reaccreditation of the course, whether the final decision is made by TEQSA or by the provider itself if it has self-accrediting authority. The major review should consider all available information about the performance of the course and all the latest information about developments in the discipline and the requirements of employers. Course review reports are important evidence on the effectiveness of the review process in the case of existing courses.

*Active scrutiny and response.* Whatever the path of approval, the course approval process should ensure that all proposals are subjected to rigorous scrutiny. It should be evident through minutes of meetings and reports that members of governing bodies and course advisory committees have been active in giving input. The minutes should also record actions arising, to be pursued by the course proponents or management.

### **Desirable features of a course proposal or application**

#### *Course design and documentation*

TEQSA would expect to see evidence of the following features in a course proposal submitted for approval to the academic governing body and/or to TEQSA:

A coherent course structure, demonstrating:

- coverage of the relevant skills, knowledge and application is at the appropriate depth and breadth needed to achieve the course outcomes;
- more introductory features are covered in earlier stages of a course, and an appropriate sequence of units leads towards achievement of more advanced features in later stages; and
- systematic organization of course elements.
- A comprehensive and current set of course specifications, including outlines for each unit.
- The course documentation includes a coherent set of appropriate learning outcomes for the course as a whole (and each nested course), consistent with the AQF level of the course, and specified learning outcomes for each unit. The unit learning outcomes should align with the course learning outcomes and the AQF level specifications.
- For the avoidance of doubt, TEQSA does not expect to see every course learning outcome covered in every unit, but students should be able to achieve each course learning outcome over the range of units in the course. Other key features of the course design, including delivery methods, assessment and student workload are clearly specified in the unit outlines and are appropriate.
- Pathways into and out of the course to further study or employment are outlined, including access to professional accreditation, and the course should prepare students for appropriate graduate outcomes including further study and/or employment.
- Where the course is delivered via a third party, there is a written agreement specifying the obligations of each party and putting in place robust quality assurance controls, enabling the registered higher education provider to take responsibility for the quality of the course (legally binding agreements are strongly recommended).

#### *Related issues*

Course Accreditation Standard 1.3 requires that the course of study is drawn from a substantial, coherent and current body of knowledge and scholarship in one or more disciplines, such as those listed in the Australian Bureau of Statistics Australian Standard Classification of Education. TEQSA will test whether the body of knowledge as presented in the course outlines is coherent, substantial and current, through assessing the course structure, topics and the lists of references in each unit.

These should include references dated within the last five years published by recognized scholarly publishers and peer-reviewed journals.

Course Accreditation Standard 1.4 provides for a course that is based on an emerging field, where the body of knowledge may be less substantial than in an established field. In these circumstances, the course should draw on the scholarly literature in established fields relevant to the course outcomes in order to ensure that the total body of knowledge presented in the course is balanced and sufficiently substantial. In these circumstances, and also where a course is interdisciplinary in nature, the course learning outcomes and structure should provide for integration of the different fields. The coherence of such a course should be evident in the course documentation despite its origins in multiple bodies of knowledge.

In addition to the wider scholarly literature (which can include, for example, commentary, synthesis and integration of knowledge), course documentation should also include references that discuss, outline or report research findings that are relevant to the field, as appropriate to the course level and field. In considering whether references are research-related, TEQSA will have regard to the definitions of research and research outputs contained in the Australian Research Council's Excellence in Research for Australia (ERA) Submission Guidelines.

Course documentation should also include references that discuss, outline or refer to relevant theoretical frameworks, as appropriate to the nature of the discipline (bearing in mind that some disciplines are more applied in nature or may not have a dominant theoretical framework).

Where course proposals are submitted for accreditation to TEQSA, TEQSA will specify a minimum set of evidence that is required. Further evidence will be required in some cases based on a risk assessment, but not in all cases. Please refer to the relevant process guides, available from the TEQSA website.

Course Accreditation Standard 1.2 requires course designers to take account of external standards other than the Threshold Standards. Where the course is designed to provide entry into a profession, TEQSA would expect to see that the course has been accredited by the relevant professional association(s) or board(s) (in the case of an existing course) or that the applicant has entered into discussions with them with a view to applying for professional accreditation. The course should address the specifications in the professional standards so that graduates will be eligible for entry into the professional association or registration by the board.

Where there are published discipline standards such as the Learning and Teaching Academic Standards Statements developed by the former Australian Learning and Teaching Council, these should also be addressed as reference points.

The broad features of the course, including admission standards and content, should be benchmarked against similar courses at other registered higher education providers.

The provider should seek advice and input from external experts in the relevant academic field and profession. TEQSA will seek evidence that this input (either in the form of minutes of a course advisory committee and/or commissioned written reports) has been carefully considered and, as appropriate, acted upon.

#### *Course resourcing*

In the case of a new course, especially in a new field, or one offered by a new provider, TEQSA would expect detailed plans to be available for the deployment of resources needed to achieve the learning outcomes for the projected numbers of students, including teaching resources and support resources (including library/information resources, course support material, physical and/or virtual learning spaces and any specialist facilities that may be required such as laboratories and equipment).

In the case of an existing course, TEQSA would expect to see evidence of existing resources being maintained and provision being made for any additional resources that might be needed either because of increased student numbers, or any new course features.

All course resourcing should be appropriate to the nature of the discipline and the course level.

#### *Academic staff*

The Course Accreditation Standards (CAS 4.1, 4.2 and 5.2) require that a course is taught and assessed by academic staff with sufficient qualifications and experience.

Provision should be made for academic leadership and adequate academic staffing for each course, either through existing staff resources or through a plan to appoint staff with the required level of qualifications and experience (which must be at least one Qualifications Standards level higher than the course or with equivalent professional experience). Evidence may include position descriptions for positions that are planned to be filled before commencement. For further detail, please refer to TEQSA's Guidance Note on Professional Equivalence and Academic Leadership.

#### *Admission criteria*

TEQSA would expect to find that admission criteria have been benchmarked with those of similar courses at other providers. The admission criteria should ensure that students admitted to the course have adequate prior knowledge and skills to undertake the course successfully.

Where advanced standing is given for prior study, the provider should ensure that each student follows a course of study that leads to achievement of the learning outcomes, despite their different starting points. Where students who do not have recent experience of academic study are admitted to a course (especially in the case of a Masters degree), TEQSA would expect that sufficient academic support is available to ensure that they can adapt to academic study successfully. They may also need to be admitted in the first instance to a lower degree in a nested sequence (e.g. Graduate Certificate in the case of a Masters degree).

#### *Assessment*

In accordance with CAS 5.1, course documentation should outline a range of assessment tasks that test each student's achievement of the overall course learning outcomes as well as the learning outcomes of each unit. In a nested course, providers need to show TEQSA how assessment tests achievement of the learning outcomes of each course by the point of potential exit. This is further discussed in TEQSA's Guidance Note on Nested Qualifications.

TEQSA would also expect to see a systematic framework within which assessments are marked and timely feedback is provided to students, in accordance with CAS 5.4. There should be defined arrangements for the management of assessment for each course and unit in each semester, designed to ensure that grading is consistent and that grading standards are consistent with those at other providers. Well-established methods to bring this about include internal and external moderation of assessment and benchmarking assessment results against those of other providers offering similar courses.

Well-established good practice in assessments also includes the use of a mix of different types of assessment, including some formative assessment tasks in addition to summative assessment.

#### *Course review*

In accordance with CAS 6.1, there should be evidence of a cycle of periodic course and unit reviews, taking into account input from external advisors in the form of regular reports considered and acted upon by the academic governance body and by management (see TEQSA's Guidance Note on Academic Quality Assurance).

An effective internal cycle of course and unit review should include consideration of trends in student results, based on systematic collection of data about student progress rates, grade distribution, attrition rates and completion rates, as required by CAS 5.4, together with related student survey results and other relevant feedback from students and stakeholders such as employers. The reasons for any variations in trends from expectations should be explored and action taken where necessary to bring about improvements in course design or delivery.

As required by CAS 5.6, the provider should be able to demonstrate that progression and completion rates are within an acceptable range, especially when benchmarked against rates for similar fields of education at other providers.

### **TEQSA's Differentiated Assessment Approach**

TEQSA uses a differentiated process to assess applications for course accreditation and re-accreditation from providers that do not have authority to accredit their courses. Applications classified as low-risk will be assessed against a sub-set of the course accreditation standards, and reduced evidence requirements will apply.

Conversely the scope and assessment requirements will be increased where the risk is higher ('Core+' model). TEQSA will consider the following factors in forming a view about the level of risk involved in a particular case:

identified risks, including at the field of education or course level, using existing data obtained through HEIMS and TEQSA's annual Provider Information Request

applications for new courses that represent a new disciplinary area or a different AQF level than existing courses delivered by the provider

verified effectiveness of quality assurance systems in combination with known student outcomes and prior history of applications to TEQSA.

#### *Expedited course assessment*

TEQSA will undertake an expedited process where the evidence demonstrates that the provider's own course review and approval process has been effective. In particular, TEQSA will be unlikely to appoint external experts to review applications for renewal of course accreditation in such circumstances, especially where:

Academics of equivalent standing to those on TEQSA's register of external experts have signed reports confirming that the course (as presented to TEQSA) meets all the relevant standards (case manager can advise on the format of these reports)

AND/OR

Academics of equivalent standing to those on TEQSA's register of external experts are members of the Course Advisory Committee (or equivalent) and where:

The academic members have given active input into the deliberations of the Committee (as evidenced in minutes of meetings)

The academic members have 'signed off' on the final course proposal that has been submitted to TEQSA

In all cases, the academic governing body needs to have approved the proposal and ensured that all relevant issues have been addressed, as evidenced in the minutes of the relevant meeting.

### **Resources**

#### **Other relevant references**

The Office for Learning and Teaching's Resource Library contains a collection of higher education learning and teaching materials flowing from projects funded by the Australian Government,

including those from the Australian Learning and Teaching Council. See

<<http://www.olt.gov.au/resources/good-practice>>.

TEQSA Guidance Note on Academic Governance

TEQSA Guidance Note on Academic Quality Assurance

TEQSA Guidance Note on Corporate Governance

TEQSA Guidance Note on Nested Qualifications

TEQSA Guidance Note on Professional Equivalence

TEQSA's 'Core +' model for course accreditation' (TEQSA Consultation paper March 2015)

TEQSA Application Guides for:

Course accreditation

Renewal of course accreditation

Self-accrediting authority.

Assessing and Assuring Graduate Learning Outcomes Project publications:

<http://www.itl.usyd.edu.au/projects/aaglo/summaries.htm>

Assuring Graduate Capabilities (Office for Teaching and Learning project) website:

<http://boliver.ning.com/>

The Quality Assurance Agency for Higher Education (2012), *UK Quality Code for Higher Education*.

Chapter B1: Programme design, development and approval.

For further information about or discussion of *course accreditation* please contact your case manager in the first instance.

## **Appendix C - List of Australian Universities Investigated During the Research**

[A number of these institutions have undergone a slight change in name since the collection of data, such as Western Sydney University, although none have become unrecognizable. Others have entered or withdrawn from affiliated groups, such as Charles Darwin University. To avoid confusion the current (2019) names and affiliations are shown below rather than the name at the time that data was collected. The official name of a number of the members of the Group of Eight commence with the word “The” (i.e. “The University of Adelaide”, and so on). This word is rarely used in normal conversation and has been omitted from the list below.]

The universities were grouped by affiliation as it was originally thought that this might lead to commonalities in accreditation procedures and thus reduce the load on the researcher. This was not the case, and it was found that membership of a particular affiliation had little if any impact on the internal workings of each institution. The symbol “#” indicates that interviews were conducted (generally by phone) to clarify uncertainties and fill gaps.

<b><u>Group of Eight</u></b>	Australian National University # Monash University # University of Adelaide # University of New South Wales # University of Melbourne # University of Sydney # University of Queensland # University of Western Australia #
<b><u>Ungrouped Universities</u></b>  <i>[Universities that belong to none of the affiliations listed]</i>	Australian Catholic University # Charles Sturt University # Bond University # Deakin University # Edith Cowan University # Macquarie University # Swinburne University of Technology # University of Canberra # University of Newcastle # University of Notre Dame Australia # University of Tasmania # University of Wollongong # Victoria University #
<b><u>Australian Technology Network</u></b>	Curtin University of Technology # Queensland University of Technology # RMIT University # University of South Australia # University of Technology Sydney #
<b><i>The following institutions have the word "University" in their title but for reasons explained in the text were not included in the study</i></b>	
<b><u>Regional Universities Network</u></b>	Central Queensland University # Southern Cross University # Federation University Australia # Carnegie Mellon University University of New England # Torrens University Australia University of Southern Queensland# University of Divinity University of the Sunshine Coast #
<b><u>Intensive Research Universities</u></b>	Charles Darwin University # Flinders University # Griffith University # James Cook University # La Trobe University # Murdoch University # Western Sydney University #
<b><u>Interviews</u></b> – A total of 54 interviews were held during 2016 and 2017, sometimes more than one in the same university. In all cases these interviews were for the purpose of filling gaps and correcting misunderstandings rather than the collection of new data. Due to travel and funding restrictions most of these interviews were conducted by phone rather than face to face and involved administrators as well as academics	

Appendix D - Risk Intelligence Map (Deloitte's Business Intelligence 2017)

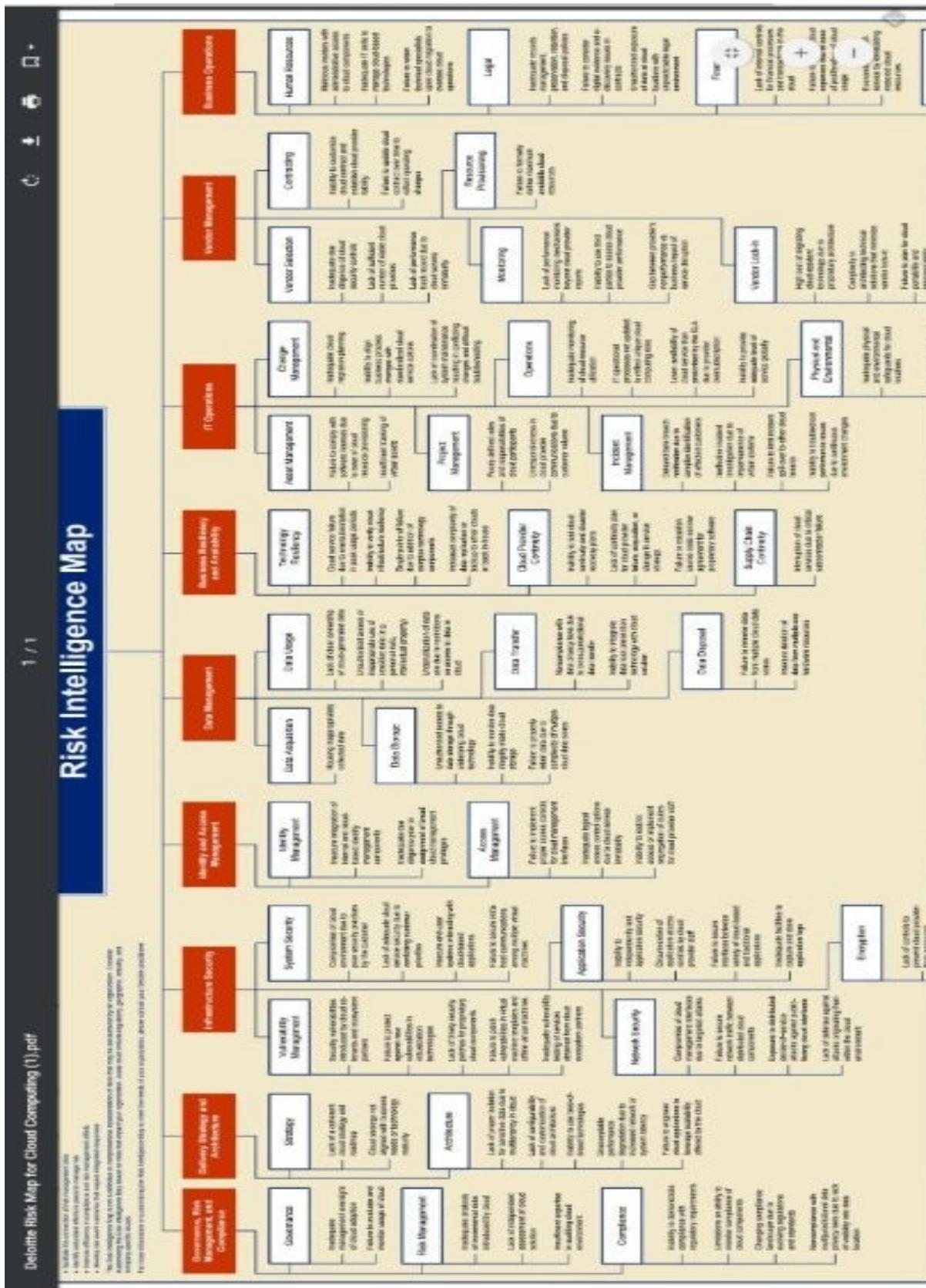


Figure D-1 Risk Intelligence Map

## Appendix E - Schlee's Theorem in Higher Education Risk Management

Schlee's Theorem comes from Economics and is summarised by Eckwert & Zilcha (2015) as;

In competitive exchange economies with efficient interim allocations, better information reduces ex ante expected utility for all individuals under any of the following conditions;

- The economy has no aggregate risk
- Some agents are risk neutral
- The economy admits a representative agent with concave vNM preferences (page 18)

This gives rise to considerable mathematics with multiple variables and higher level calculus that will not be discussed here.

When used in Higher Education Risk Management calculations the mathematics behind the theorem suggests that the greater the intelligence of risk (based on quantity versus depth versus veracity) the greater the willingness of an institution to take risk, but only up to a certain point, beyond which the threat of risk will overwhelm the risk taker despite the accuracy or validity of the data. (This is often illustrated by a racing example. A punter may be willing to place a \$10 bet if he feels – on the basis of all available evidence - that a horse has a reasonable chance of winning. He may be less willing to risk \$10,000 on the same animal, particularly if there are other strong runners in the field, the track is wet and soggy, the jockey is unknown, or if there is a better chance of using his limited funds on more certain bets in other races. **The mathematics determine the point at which the data indicates that the risks have become too high, with the probability of the punter – or the institution – while previously willing to take the chance, now withdrawing from the opportunity)**

As mentioned in the text of the thesis (Section 3.1.4.2) this instrument is used solely in the planning units of Australian universities and appears to be unknown elsewhere in the academy.

The researcher is indebted to the planning officers or a number of institutions for this explanation.

## Appendix F - URMIA Risk Categories

(Based on Klinksiek 2016 and on additional information provided at interview by Australian university risk managers.) Each requires a different approach to risk.

- **Affiliated entities:** independent academic organizations, student and alumni organizations, research centres, commercial partners and co-located providers such as VET and community colleges that may be associated by the public with the university
- **Athletics and off campus activities:** Conferences, rented rooms and facilities, graduation ceremonies, open days, injuries and resulting medical care to players or spectators, sporting body compliance, spectator control, terrorism and crowded place incidents, team trademarks and licensing, team behaviour off field, issues arising from spectator disappointment such as cancellations due to weather. [In Australia this also includes gender issues arising from sport.]
- **Brand and reputation:** academic excellence, academic freedom, alumni relations, constitutional challenges, free speech and expression, relationship with key benefactors and supporters
- **Business continuity and emergency planning:** breadth and currency, emergency response, international activity, (including contact details for exchange students while overseas), coordination with local emergency services, registration and compliance with the Australian Inter-Service Agency Incident Management System (AIIMS) – a government authority with which all universities must now be registered, and a further source of risk, although for security reasons little mention is made of this, even to university staff
- **Community:** economic development, use of institutional facilities by community members and organizations, service bodies and cultural contributions to local society
- **Competition:** handling diverse educational providers, college rankings and public perception of the institution, including inappropriate advertising
- **Conflict of interest or commitment:** internal competition between staff or units for scarce resources
- **Demographics:** Falling enrolments or high attrition rates), increasing dependence on international students, housing and student accommodation, parking and transport
- **Enterprise risk management:** effective program design, assessment and mitigation plans
- **Financial:** Budgeting, capital sufficiency, construction management, contracts, deferred maintenance, local and national economic conditions, energy and water costs and availability, fund raising, grant procurement, investment management, tuition fees, staff deferred liabilities (superannuation), insurance, taxation, auditing and legal reporting requirements
- **Gender-related issues:** equality, sexual harassment and assault, LGBTQI issues
- **Governance and institutional management:** Affordability, authorised activities, competency based education, institutional culture, decentralised activity, educational technology, leadership and strategic planning, shared governance and academic freedom, maintaining registration by meeting all requirements of TEQSA and other government agencies
- **Government support of higher education:** financial aid, government financial support, sponsored research, regulators such as TEQSA

- **Human resources:** code of conduct, diversity, employee productivity, employee benefit management, employee rehabilitation, workplace safety, relations with unions and staff professional bodies, wage and hour compliance
- **Intellectual property:** legal compliance and defence, copyright, patents, foregone opportunities
- **International:** Asset protection, competition, compliance with off shore requirements, emergency response, ethical violations, global trends, locality risk, change in host government policy, tariff and trade agreements
- **Local, state and federal regulation:** Compliance with all legal requirements of the three tiers of government, timeliness of returns and reporting, compliance with Defence Procurement Policies and Defence Centred Research including AUSMURI (Australian-US Multidisciplinary University Research Initiative – for more information see <https://www.dst.defence.gov.au/publication/ausmuri>)
- **Operations:** Auxiliary businesses such as bookstores and publishing, library and art collections, online learning, outsourcing, security of premises, student travel and transport, student health services
- **Property:** physical damage, depreciation and obsolescence, inadequate design, inappropriate naming of buildings, monuments and statues, environmental issues (including noxious weeds) water management, fences and boundaries
- **Public safety:** terrorism and related incidents, building access and security, crime, compliance with the requirements of the Australian National Security Agency, minors and others on campus or engaged in university activity (including research), conformity with Australian Child Protection Legislation and the Australian Code for the Responsible Conduct of Research.
- **Internal Safety:** fire and life security, road hazards, signage and parking, laboratory safety, catering, pandemics, research hazards, inadequate or inappropriate staff and student training, use of emergency equipment (fire extinguishers, etc) on campus
- **Students:** academic standards and graduation rates, access and disability requirements, admission and enrolment, alcohol and substance abuse, at-risk students (including student suicide), campus predators (including bullying), financial scams, contract essays and other forms of cheating
- **Technology:** Access, relevance, obsolescence, equipment failure, replacement strategies, mobile devices, performance capacity, hacking, security and cyber liability, use of technology for inappropriate purposes.

## Appendix G - Victoria University – Risk Management Procedure

*[Included as an example to support the information provided in Section 4.2.3.2. but shortened slightly for reasons of space]*

### Section 3 - Scope

(2) This Procedure applies to:

1. All staff, students, Council members, contractors, honorary and adjunct staff.
2. All activities under the control or direction of the Victoria University ('VU'), whether conducted on or off University property.

### Section 6 - Procedures

#### Part A - Summary of Roles/Responsibilities

(5) It is critical for the successful implementation of the risk management framework that there are clear accountabilities and responsibilities for the process.

(6) The overall responsibilities of various groups and individuals within VU are summarised in the table below.

Roles	Responsibilities
Council	<ul style="list-style-type: none"> <li>• Delegate risk management responsibility to the Compliance, Audit and Risk Committee (CARC).</li> <li>• Review all strategic and enterprise risks and significant operational risks.</li> <li>• Oversees CARC discharging its risk management responsibilities.</li> </ul>
Compliance, Audit and Risk Committee (CARC)	<ul style="list-style-type: none"> <li>• Ensures the risk management framework is being maintained by Management.</li> <li>• Elevate critical risks to the Council.</li> <li>• Approves the definitions of strategic, enterprise and operational risk profiles.</li> <li>• Approves the characterisation of specific risks as strategic, enterprise and significant operational risk.</li> </ul>
Senior Executive Group	<ul style="list-style-type: none"> <li>• Highlights any significant or emerging risks to CARC.</li> <li>• Develops / refreshes the current strategic and enterprise risk registers which fall within CARC's approved profiles.</li> <li>• Oversees the effectiveness of control mechanisms and treatment plan implementation for strategic and enterprise risks and significant operational risks</li> </ul>
Senior Leadership Group	<ul style="list-style-type: none"> <li>• Highlights significant operational risks to the Senior Executive Group (SEG).</li> <li>• Develops / refreshes operational risk which fall within CARC approved profile.</li> <li>• Implements effective control mechanisms and mitigation plans for operational risks.</li> </ul>
Planning & Governance Portfolio	<ul style="list-style-type: none"> <li>• Collaborates with VU units and Colleges to embed risk management process and culture.</li> <li>• Develops / refreshes the tools used to identify, assess, and manage risks.</li> <li>• Maintains and updates records of strategic, enterprise and operational risks and provides a risk highlight report, at least quarterly to SEG.</li> <li>• Provides proactive assistance, education and performance checks for all units and Colleges of VU.</li> </ul>
All staff	<ul style="list-style-type: none"> <li>• Manage operational risks in their day-to-day roles.</li> <li>• Bring any potential risks to the attention of management.</li> <li>• Participate in the operational risk identification, recording and review processes whilst developing and implementing treatment plans where required.</li> </ul>

Roles	Responsibilities
	<ul style="list-style-type: none"> <li>Following procedures and policies which govern the implementation of controls to manage risks.</li> </ul>

(7) Please see the [Key Activities in Operationalising the Risk Management Framework](#), including who is responsible, accountable, consulted and informed as part of those activities.

(8) Greater detail regarding the activities of certain roles is found in the [Risk Management Framework Guidelines](#).

### Part B - General

(9) The purpose of these procedures is to implement the [Risk Management Policy](#). The process for managing Victoria University's risks is consistent with the risk management standard AS/NZS ISO 31000: 2009. The key steps include providing feedback through a monitoring, review and reporting process and appropriate communication and consultation.

(10) This is represented visually in [Flowchart 1](#) and [Flowchart 2](#).

### Characterisation of risks

(11) VU has defined three levels of risk:

1. Strategic risks - risks which arise from, or threaten the success of the strategic choices that VU has made. They are often driven by change in the operating environment and ecosystem.
2. Enterprise risks- risks so severe or material that their realisation could threaten the very survival of VU.
3. Operational risks - risks which are managed within VU's units and Colleges and could jeopardise the achievement of their business plans. These risks may be escalated to the enterprise level if the impact would affect VU's license to operate or very existence.

### Step 1 - Communicate and Consult

(12) At the very start of any risk management activity, the answers to two simple questions should be sought:

1. Who will have information that will be useful in identifying and managing risks?
2. Who do I need to keep informed about what I am doing?

(13) The [IRACI Communications Tool](#) helps to ensure that appropriate persons are identified as stakeholders, and that these "providers" and "recipients" of information have their communication needs addressed during the risk management process. This should be considered for all risks identified to ensure that all stakeholders are communicated to.

### Step 2 - Refresh Develop

#### Set the context

(14) Establishing the context for the risk management activity sets the scope and boundaries for the whole risk management process. It is the key mechanism for providing the foundations for identifying and analysing the risks.

(15) The key objectives of establishing the context are:

1. To ensure that there is an appropriate level of understanding of the operations of the specific area of the VU under review;
2. To determine the scope of the proposed risk management activity;
3. To begin to identify the issues, constraints, etc. that could give rise to hazards, threats and risks.

(16) Establishing the context involves a consideration of the: external context, internal context and risk management context as further described in the [Risk Management Framework Guidelines](#).

### Developing the evaluation criteria

(17) The effort that should be put into establishing the context will depend upon the extent and complexity of the risk management activities concerned. The more comprehensive the context, the more information is developed to inform the risk management process. However, there will always be legitimate trade-offs that will limit the extent of, and effort put into the context.

### Step 3 - Define 'What Must Go Right' to Achieve Objectives

(18) Management needs to identify 'What Must Go Right' to achieve the objectives. This will be 'What Must Go Right' for the:

1. Strategy for the strategic risk assessment;
2. University to be financially viable and retain its license to operate for the enterprise risk assessment;
3. Achievement of the unit / College business plan for the operational risk assessment.

### Step 4 – Identify the Risks

(19) At first, a broad list of possible risks should be developed but prioritisation of risks should lead areas to identify all high, major and moderate risks which would impact the achievement of VU's objectives, whether or not they are under the control of VU.

(20) Risks are to be identified as they arise any time but risk management is a critical component of the development of VU unit or College's strategic plan; so that both operational and strategic risks are aligned with VU's strategic plan.

### Risk Identification Methods

(21) There are many methods for identifying risk, including:

1. facilitated brainstorms, interviews, questionnaires, workshops, data analysis, stakeholder feedback;
2. SWOT analysis; scenario planning and gap analysis are also useful management tools.

(22) Risks are likely to arise in the following circumstances:

1. Lack of clarity about what needs to be done and what should not be done.
2. When it is not clear who is responsible and who is accountable to deliver a key output and key outcome.
3. When strategies are not clear and KPIs are not aligned with policy/project objectives.
4. Lack of knowledge about university policies, stakeholder needs and government requirements.
5. When decisions are made without analysing relevant, accurate and up-to-date data.
6. Whenever there is a lot of staff turnover — including senior management.
7. When managing a complex project that is new and/or challenging and/or requiring stakeholder engagement and/or requiring a whole-of-university approach.
8. When a policy or program is not communicated well to key stakeholders.
9. Lack of capability.
10. Whenever organisational units experience a negative collegiate culture.
11. When managing large expensive projects.
12. When few are asked to do more work to compensate for the lack of resources.
13. When organisations undergo drastic changes.

### Step 5 - Analyse the Risk Level by Combining the Likelihood and Consequences Ratings

(23) Risk analysis is about developing an understanding of the risk and the extent to which it can prevent an organisation achieving its goals.

(24) Once all risks have been identified they are analysed in terms of how likely the risk event is to occur (likelihood) and the possible magnitude (consequence) of the risk event.

(25) Rating Risk Likelihood (see [Likelihood Criteria Table](#)): requires an assessment of the risk's frequency of occurrence. The likelihood of a risk is rated on a score from 1 (rare) to 5 (almost certain).

(26) Rating Consequences (see [Risk Consequence Rating](#)) represent the magnitude of the risk or its impact if it were to occur — they are rated on a scale of 1 (insignificant) to 5 (catastrophic).

(27) The final ranking of a risk is obtained by combining the selected likelihood and consequence rating for each risk. Please see the [Risk Matrix](#). Note that existing controls in place to mitigate risk should be considered when assessing the likelihood and consequence so that the assessment reflects the residual level of risk.

(28) A risk assessment can generate a large number of risks and dealing with such a quantity in a meaningful way may well be beyond the capabilities, resources and time limitations of an individual assessment. It is therefore entirely appropriate to conduct an initial 'screening' assessment in order to create a 'shortlist' of risks for a more in-depth analysis.

(29) The consequence and likelihood criteria referred to above have been developed for most risk management activities down to project level. However, the applicability of these criteria needs to be examined as part of establishing the context for each individual risk assessment activity.

(30) The consequences reflect the amount and type of risk that VU is willing to accept in order to meet its strategic objectives. It is the responsibility of the Planning and Governance Portfolio to refresh this table if VU's risk appetite changes and to facilitate SEG obtaining CARC's approval of any such changes.

(31) The interrelation of risk across VU needs to be assessed and plotted in accordance with [Risk Management Profile Structure and Responsibilities](#) to ensure an holistic view of VU's risk is obtained and communicated.

### **Determining the Level of Risk**

(32) The level of risk is determined by aligning the consequence and likelihood using the risk rating matrix outlined above to derive a level of risk. As each risk will require different levels of management attention at different times based on the complexity of the control environment and factors causing the risk to exist, the management priority focus should be captured for each risk using the [Risk Priority Rating](#).

### **Step 6: Evaluate Approach to Managing Risks**

(33) Each risk will need to be assigned a Risk Priority Rating, depending on the rating derived from the risk matrix and the ability of VU to control the risk. Further information is in the [Risk Management Framework Guidelines](#)).

(34) Mitigation strategies may include:

1. Developing a decision making process including the assignment of authority and responsibility.
2. Refinement of policies and practices.
3. Addressing any gaps in the competence of personnel.
4. Refreshing the communication of policies, procedures etc to internal staff and keystakeholders.
5. Regular monitoring and reviewing of risk management actions to ensure that the reasons for taking the risk are met.

(35) Except in exceptional circumstances VU will only accept risks which have a final risk rating (as a result of mitigation strategies or otherwise) which is acceptable.

### **Step 7: Treat Risks**

(36) The person proposing that VU accept the risk must develop an action plan to mitigate these risks to an acceptable level (see [Risk Management Framework Guidelines](#)). Action plans must be implemented.

### **Step 8: Recording Risk**

(37) The [Risk Management Form](#) must be used to document the risk treatment for each risk. The form requires identification of the risk (including what is causing the risk); management action for each cause; a target date; the name of the person responsible to complete each action point.

(38) It is critical that there are clear and concise communication channels to provide management with the mechanisms to elevate specific risk information whilst providing the transparency and oversight to Council, CARC and SEG. The accuracy and timeliness of risk information is critical to providing the right information to specific groups so that they can make informed risk based decisions.

### **Risk Registers**

(39) Risk registers must be developed and maintained.

### **Strategic Risk Register**

(40) Planning and Governance Portfolio is responsible for the planning and facilitation of any strategic risk register refresh.

(41) The register must be focused on risk to and from VU's strategic plan.

(42) SEG and the CARC will participate in annual workshops to develop and refresh the register of strategic risks.

(43) It is the responsibility of the Planning and Governance Portfolio to finalise the register of these risks and report to SEG and CARC in accordance with the [Annual Risk Planning and Review Cycle](#). Out of cycle reports must be made if there is a material change to VU's Strategic Plan.

### **Enterprise Risk Register**

(44) Planning and Governance Portfolio is responsible for the planning and facilitation of the quarterly review and annual refresh of the enterprise risk register following the strategic register.

(45) The register must be developed based on risks identified in the strategic risk register related to operations and those risks identified in operational risk registers which, if they were to materialise, would result in significant consequences for VU.

(46) SEG will conduct quarterly reviews and annually refresh the enterprise risk register.

(47) It is the responsibility of the Planning and Governance Portfolio to finalise the enterprise risk register and report to SEG and CARC in accordance with the annual risk cycle in [Annual Risk Planning and Review Cycle](#).

### **Operational Risk Register**

(48) Planning and Governance Portfolio is accountable for ensuring that the quarterly review and annual refresh of the operational risk registers is completed by each VU unit and College.

(49) The operational risk registers must be developed based on risks to the achievement of VU units' and Colleges' business plans and the enterprise risks which affect the whole of VU.

(50) The head of VU's unit or College is responsible for ensuring that, on a quarterly basis, the operational risks are appropriately reviewed and updated. Annually a then operational risk register must be finalised.

(51) It is the responsibility of the Planning and Governance Portfolio to ensure that the operational risk registers are finalised so that it can report to SEG and report highlights to CARC in accordance with the annual risk cycle in [Annual Risk Planning and Review Cycle](#).

(52) The [Risk Management Framework Guidelines](#) provide details regarding the requirements of reports.

### **Step 9: Monitoring and Reviewing risks**

(53) Monitoring and reviewing risks is an important part of risk management. It allows risk owners to identify any new risks arising or changes in existing risk rating due to changing circumstances and to review the extent to which risks have been mitigated.

(54) Risk owners should monitor and review risks regularly and ensure that changes are recorded in appropriate risk registers on an ongoing basis.

### **Step 10: Risk Management Continuous Improvement Cycle**

(55) The risk management methodology is aligned with the principles of continuous improvement. It requires all individuals and groups within VU to continually identify, assess, mitigate, review and report risks within their areas of operation, so that all risks are mitigated and managed to an acceptable level in accordance with the risk appetite that has been approved by CARC.

(56) The [Risk Management Continuous Improvement Flowchart](#) illustrates the risk management continuous improvement cycle.

## **Appendix H - Framework for the Interviews Associated with this Research**

### **Background to this document**

It is difficult to conduct interviews with university staff, particularly with those having a professional interest in research, as one is invariably faced with friendly yet supportive questions regarding one's methodology, conceptual framework and literature review, to the point where this can dominate discussion with little data collected. For this reason, interviews needed to be carefully controlled with the candidate leading the discussion rather than the informant. To achieve this, it was suggested that I locate my questions to informants within a structural framework that would keep the task on track while at the same time allowing the quick analysis and collation of data using standard software. I did this using the methodology suggested by Wilson (2014) which after a discussion of alternatives seems to be the most appropriate vehicle for research into the inner workings of universities.

Wilson discusses structured, semi-structured, unstructured and mixed developmental interviews, in the last of which one proceeds from a structured framework through a semi-structured mode to an individual approach specific to the person being interviewed. My interviews had the potential to extend from Vice Chancellors to HEW 3 or 4 general staff so the "structured flexibility" model presented by Wilson was valuable.

There was never any intention of asking every question in the following document. Even if informants had the patience to put up with such a time consuming session, the range, number and volume of responses would produce a mass of data that would be overwhelming and unusable. My purpose in listing these questions here is to show the range of issues covered and to give some indication of their collation and analysis.

It is not my aim to give a complete explanation of Wilson's methodology here. The reason I have included the diagram is to allow the questions that follow to make sense as otherwise one could end up with a spreadsheet of endless categories of letters and numbers that are completely meaningless.

An absorption test (Appendix H) for triangulation purposes was conducted after each interview, but before these interviews are transcribed.

### **Problems arising**

Informants were sent a copy of the structured questions in advance. By and large, all interviews (many of which were held by phone) passed successfully. The following issues arose:

- Time was found to be a critical factor. Informants were available for a limited period and it was hard to get through all questions in the time available
- As anticipated, even with a structured protocol it was extremely hard to keep academics on track and to avoid gossip and hobbyhorses
- Encoding and data processing, while successful, were far more time consuming than anticipated.

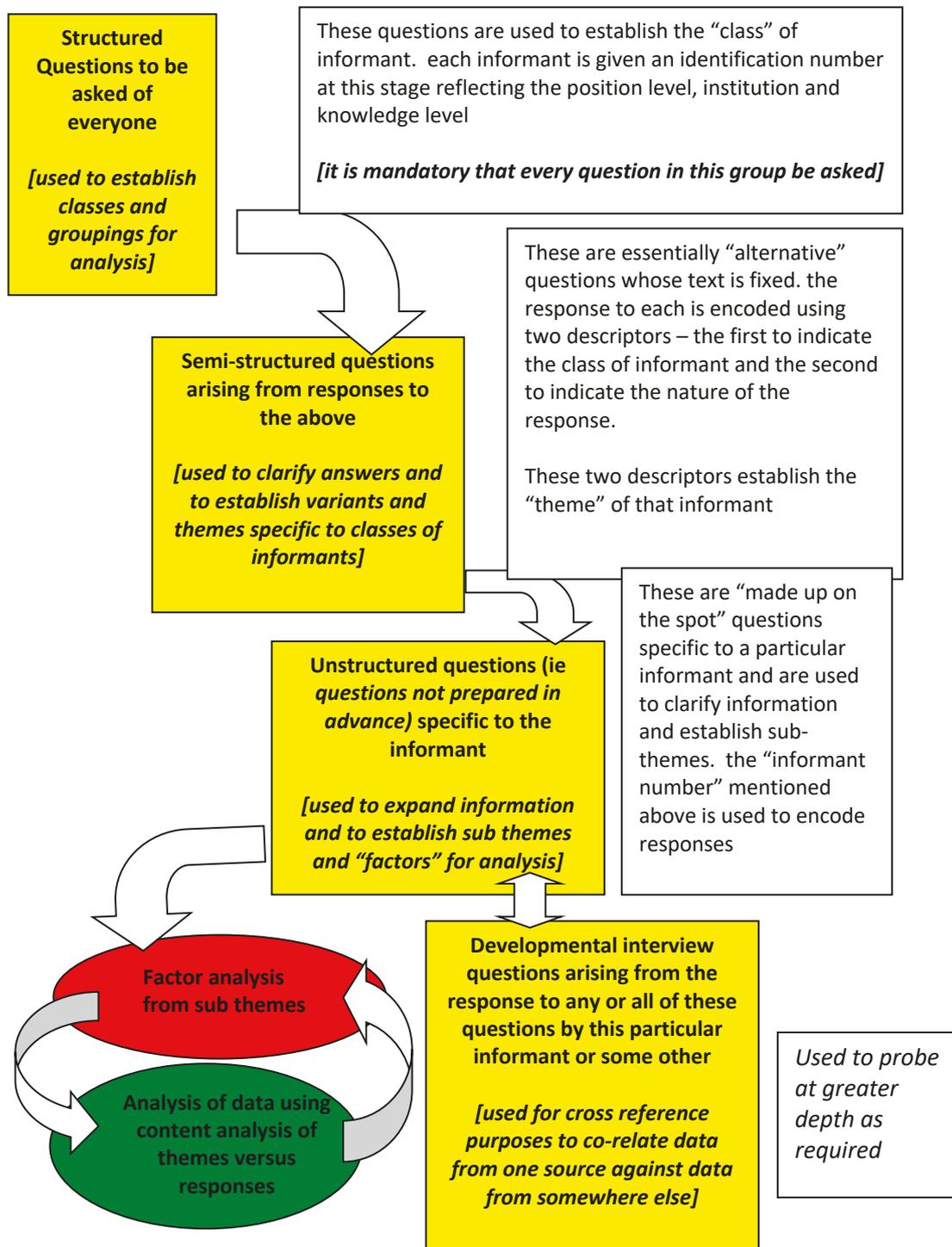


Figure H-1 Interview Techniques (taken from C Wilson 2014)

**Structured questions asked of everyone**

1. General [Yes – No response only. No coding was used to a negative answer as this would result in the termination (and possible rescheduling) of the interview]

- Have you completed a consent form?
- Do I have permission to record our conversation?
- Have you read the information sheet regarding my research?
- Do you have any advice on how the research might be improved?

[Justification for these questions. The first three questions are asked for legal and practical reasons. The fourth question – an icebreaker - seeks confirmation that the information sheet has been read, and by asking advice from the respondent incorporates that person into the research process]

2. Background to informants [On the basis of the information provided the informant would be allocated to a “class” that would encompass all informants of a similar background. Each informant will be allocated a number using the code shown below]

- Do I have your correct name? [The name would not of course appear in the final thesis]
- What is your current position within the university?
- What is your role in the course accreditation process?
- How long have you been involved with course accreditation?
- Have you been involved previously in other roles associated with course accreditation?

[Justification for these questions. These questions are intended to confirm the identity, position and the role of the person in the accreditation process and to assess their knowledge and experience of procedures.

**CODING**

University no	Numeric [1-40]	[separate	Number for	Each aust	Univ]
Name of informant	Text	[but	De-identified	Before use	In thesis]
Position	Text	[but sorted	Into group	& identified	By number]
Role	Text	[ranked 1 – 10	According	To task]	
Experience	Text	[ranked 1 – 10	According	To exper’ce]	
Previous association	Text	Ranked 1 – 10	According	To previous	Association]

Thus, a DVC might be coded as Univ **01**, Position **3**, Role **5**, Exp **8**, Assoc **4** = Informant No **013584**

An administrator at another university might be coded as Univ **18**, Position **7**, Role **5**, Exp **4**. Assoc **2** = Informant No **187541**, and so on

**The course development process – Initial course proposal**

**Structured Question**

- Could you briefly run me through the course approval process?

[Justification for this question. While the researcher would have made himself familiar with the documented procedures of the institution well before the interview he will be interested in hearing the process described by participants at multiple levels in their own words, noting updates and departures from the published material and inconsistencies in the reports of informants from the same university.

This also allows the informant to be linked the research through providing an input in his or her own words]

#### Semi-structured questions arising from this structured question

[Not all questions were asked, but if they were the same question, with the same wording, was used in each case]

- Does the university require an Initial Course Proposal (or equivalent) before course development can commence? *[If the answer is “No” – and some universities did not require this - the questions that follow were redundant and the alternatives in the section beyond this were asked in their place*
- Where does the initial concept *[if used in your university]* originate?
- Are there exceptions to this, and are these exceptions frequent?
- Who develops the initial course proposal *(again, only if initial course proposals form part of the course accreditation process)?*
- What is normally contained within an initial course proposal?
- Is any check made to see whether the proposal may conflict with or impact upon another course offered by the university, and if so, how is this done?
- Is there any difference where a course is developed for contract delivery?
- Is there any difference where a course is intended to replace an existing program?
- Are any initial course proposals campus specific and what additional steps may be involved where this is the case?
- Are the procedures for an initial course proposal the same where course are to be delivered by Distance (or some other form of off-campus) Education?
- Are the procedures for an initial course proposal the same where courses are to be delivered off shore ***by the institution?***
- Are the procedures for an initial course proposal the same where courses are to be delivered off shore ***by an agent or partner?***
- Are the procedures for an initial course proposal the same where courses are to be delivered ***in a language other than English?***
- Is it a requirement for initial course proposals to be endorsed by external persons or bodies?
- Who approves the academic aspects of an initial course proposal?
- Who approves the commercial aspects of an initial course proposal?
- Who approves the resource implications of an initial course proposal?

#### Alternative semi-structured questions

*[Asked if the response to the structured question is No]*

- Where do course proposals normally originate?
- Who ensures that resources are available to mount the course?
- Who ensures that there is sufficient demand for the course?
- Who prepares a business plan for the course?
- Who approves the business plan for the course?
- Who determines whether other courses should be phased out to accommodate this proposal?
- Who underwrites the cost of the course development process?
- Who gives ultimate approval?
- How is duplication avoided?
- Who advises the institution (staff, faculty, stakeholders, etc) of each of these decisions?
- How are each of the above carried out?

[The researcher was aware that in those institutions where an initial concept proposal is not required, much of this work is done in the Faculty under the direction of the Dean and key faculty staff (Faculty Business Manager, etc).

At the same time, it was felt important to gain this information direct from informants rather than from prior or personal knowledge]

Justification for these questions – The published course approval procedures are often vague about Initial Course Proposals, suggesting that they are needed but providing little information on their content or administration. These questions were intended to throw further light on what the institution requires

### **Unstructured Questions**

These were asked as required and the response recorded separately. [Unstructured questions can arise only as extensions or follow up from the semi-structured questions listed above. In the Wilson model, they cannot be asked “ad novo” or in isolation from everything else, but must come from the responses already received, and for this reason could be foreshadowed in advance.]

### **Developmental Interview Questions**

These questions were used to co-relate data from one source against data received from another. [Thus if one person says that something is done in a particular way in a certain university while a second or subsequent person says that it is done differently in the same institution the developmental interview questions were used to determine exactly what occurs and possibly why different answers might have been given.] As in the case of their unstructured counterparts, these questions could not be framed until after the interview process commenced.

### **Encoding of Responses**

Wilson is at pains to stress that all questions asked at interview must be developed after the system of coding used for analysis is in place. [In other words, the coding comes first and then the questions to be encoded are shaped around it. Wilson is strongly opposed to any form of interview that involves asking questions first and then searching for some method later to encode the responses.]

With this in mind an encoding template was developed for this set of questions as shown on the following page. The response in each case was reduced to a numeric value for final analysis, essentially because the software finds it easier to pick out a number within a string of figures than to identify a word in a string of text [which as all users of search engines are aware may produce an ambiguous response in any case].

The encoding was based on the transcript of interview and was commenced as soon as the written transcript had been cleared by the informant.

Informant Number..... (using the coding previously explained)

Date of Interview..... (additional information for internal checking purposes)

Structured Question 1. – Can you briefly run me through your course approval process?.....  
Assessed by the researcher on a scale of 1 to 9 (1 = least, 9 = most) depending on the amount of detail provided and the informant's knowledge of the process. [If the answer to any question either here or later is "Don't know" the response is encoded as zero]

Semi-structured questions

1A – Does the University require an Initial Course Proposal? [Yes or No = 1 or 2].....  
If the University **does require** an Initial Course Proposal some of the following questions may be asked with the response being given a code of 1 to 9. [If a question is not asked it is encoded as Zero]

- 1A1 - Where does the initial concept [if used in your university] originate?.....
- 1A2 - Are there exceptions to this, and are these exceptions frequent? .....
- 1A3 - Who develops the initial course proposal .....
- 1A4 - What is normally contained within an initial course proposal? .....
- 1A5 - Is any check made to see whether the proposal may conflict with or impact upon another course offered by the university, and if so, how is this done? .....
- 1A6 - Is there any difference where a course is developed for contract delivery? .....
- 1A7 - Is there any difference where a course is intended to replace an existing program? .....
- 1A8 - Are any initial course proposals campus specific and what additional steps may be involved where this is the case? .....
- 1A9 - Are the procedures for an initial course proposal the same where course are to be delivered by Distance (or some other form of off-campus) Education? .....
- 1A91 - Are the procedures for an initial course proposal the same where courses are to be delivered off shore **by the institution?** .....
- 1A92 - Are the procedures for an initial course proposal the same where courses are to be delivered off shore **by an agent or partner?** .....
- 1A93 - Are the procedures for an initial course proposal the same where courses are to be delivered **in a language other than English?** .....

1B - Alternative Semi-Structured Questions

- 1B1 - Where do course proposals normally originate? .....
- 1B2 - Who ensures that resources are available to mount the course? .....
- 1B3 - Who ensures that there is sufficient demand for the course? .....
- 1B4 - Who prepares a business plan for the course? .....
- 1B5 - Who approves the business plan for the course? .....
- 1B6 - Who determines whether other courses should be phased out to accommodate this proposal?....
- 1B7 - Who underwrites the cost of the course development process? .....
- 1B8 - Who gives ultimate approval? .....
- 1B9 - How is duplication avoided? .....
- 1B91 - Who advises the institution (staff, faculty, stakeholders, etc) of each of these decisions? .....
- 1B92 - How are each of the above carried out? .....

1C – Unstructured Questions [Framed individually]

1C1 – [Write in question] ..... (and so on)

ID – Developmental Interview Questions [Framed individually]

1D1 – [Write in question] ..... [and so on]

Informant No	1	1A1	1A2	1A3	1A4	1A5	1A6	1A7	1A8	1A91	1A92	1B1	1B2	1B3	1B4
13584	8	1	6	4	9	5	7	7	9	8	4	0	0	0	0
15919	0	2	0	0	0	0	0	0	0	0	0	5	4	4	8
24515	7	1	5	4	4	5	0	6	4	6	5	0	0	0	0
29584	6	1	0	0	5	7	7	9	4	6	7	0	0	0	0

And so on. [For clarity not all columns shown – Zero means that the question wasn’t asked or that the respondent didn’t know or made no reply.]

Thus in the case of informant no 15919 (second entry in the example above) it would seem from their response to question 1A1 that their university does not require an Initial Course Proposal and for this reason the semi-structured questions 1A2 to 1A93 were not asked, with the informative level of the answer in these cases being zero. In their place questions 1B1 to 1B4 – and possibly more not shown on the spreadsheet above through lack of space – were asked as substitutes.

As the informant number indicates the personal details of the informant (as explained previously) it was easy for the researcher to identify this person quickly and to assess their level of response to each question but at the same time it remained extremely hard for someone unfamiliar with the code to do so. This information enabled all respondents from the same institution to be identified (*all with the same first figures in the Informant No*) and their data separated, or alternatively all persons holding a similar office, such as Chairs of Academic Board (*second figure in the Informant No*) or all persons who have worked in course accreditation for a considerable period (*fourth figure in the Informant No*), and this was then used to identify the response from all persons across a range of universities who share commonalities. The transcript of individual interviews could then be searched for themes within these replies. [Each structured question was regarded as a “theme”.]

For this reason, the spreadsheet should be seen more as an index to the data than a method of analysis in its own right, that lists (in an encoded manner) the details of each informant and their response, together with the assessed value of their information.

The software (based on Excel) allowed more than this, however. Thus, suppose it was necessary to determine to the average level of information about a particular theme (say Question 1) within a particular institution. The software would be asked to average each of the figures in the same row from 1A2 to 1A92 for all informants beginning with a particular institutional number (i.e.; persons from the same university), and then as a second step to average the same cells across all institutions, perhaps following this up by investigating all who fall markedly above or below the average, and determining for example why the staff in a particular university appear to be ill informed about Initial Course Proposals while others were not, or whether Deputy Vice Chancellors across the sector seem to know more about the processes in their institution than their administrative assistants. This clarification of themes enabled the written data in the interview transcripts to be located accordingly.

Many other computations were possible linking one set of data – or data from one source - with another (or a third or fourth set if desired) although I will not go into that here. The key point is that having reduced the quality of the response to a numeric code it is possible to interrogate it quickly and place an appropriate value on its merit – a point stressed by Wilson (2014). It is also a valuable means of comparison and quality control in text mining.

It is possible to go more quickly through the other questions, each of which involved the completion of a spreadsheet similar to the example given above.

## **The course development process – Articulation from other providers**

### **Structured questions**

- Could you explain how articulation agreements are developed within the university?
- Does articulation form part of the course approval process or is it handled by a separate group or process within the university?

[Justification for these questions – It is sometimes forgotten that “articulation” (the admission of a student from another institution with credit transfer guaranteed by a formal agreement between providers) represents an alternative pathway towards a degree, and hence is intimately connected with course approval. In certain universities (such as UTS) articulation is the responsibility of the Courses Accreditation Committee while in others it is the responsibility of someone else (Faculty, International Office, etc). The body responsible is often unclear from documented course accreditation procedures]

### **Semi-Structured questions arising from the structured question**

- At what stage in the course development cycle does articulation occur? *[In some universities this is included in the course development stage, while in others it is left to one side until the course is approved]*
- Are there courses within the university that are dependent on articulation from other providers? *[Perhaps where the university doesn't offer the first year at all?]*
- What safeguards does the university have in place to ensure the maintenance of standards by the articulation originator?
- What is the normal duration of an articulation agreement?
- Does the university have any courses that are specifically designed to articulate into other programs, either within the university or elsewhere, and if so, does this affect their approval?
- Does the university view transfer from a university college or preparation centre with advanced standing *[as in the case of UTS and InSearch]* as an “articulation”, and if so, is this handled the same as all other articulations?

### **Alternative semi-structured questions**

[Asked if told that articulation is kept completely separate from the course approval process in a particular institution]

- Who has responsibility for the development and monitoring of articulation arrangements within the university?
- Is there any difference in the organisation of local versus international articulation?
- Who approves articulation agreements? *[DVC, Academic Board, Faculty, etc?]*
- What links exist between Articulation and Course Approval within the university? *[Common membership of committees, sharing of information, etc]*

[Justification for these questions – It was suspected that considerable overlap existed between articulation and course approval in most institutions although this might not be acknowledged, even by the university itself. This set of questions was designed to tease out this matter.

Unstructured and Developmental questions could not be predicted in advance and were asked as the need arose.

### **Coding and analysis of responses**

The following chart was used:

Informant No .....	Date.....
<b>Structured questions</b>	
2 - Could you explain how articulation agreements are developed within the university?..... [Graded 1 – 9 on clarity of information. Zero indicates that the informant didn't know or didn't answer]	
2A - Does articulation form part of the course approval process ? [Yes = 1, No = 2, Don't know =0] .....	
<b>Semi-Structured questions arising from the structured question</b>	
2A1 - At what stage in the course development cycle does articulation occur? ..... [During initial development = 1, After course approved = 2, Other = 3, Varies = 4]	
2A2 - Are there courses within the university that are dependent on articulation from other providers? ..... [Yes = 1, No = 2, Don't know = 0]	
2A3 - What safeguards does the university have in place to ensure the maintenance of artic standards ..... [1 – 9, Score in this and all following questions dependent on the clarity of answer]	
2A3 - What is the normal duration of an articulation agreement? .....	
2A4 - Does the university have any courses that are specifically designed to articulate into other programs? .....	
2A5 - Does this affect the approval of these courses?	
2A6 - Does the university view transfer from a university college etc as an "articulation",? .....	
2A7 - If so, is this handled the same as all other articulations? .....	
<b>Alternative semi-structured questions</b>	
<i>[To be asked if told that articulation is kept completely separate from the course approval process in a particular institution]</i>	
2B1 - Who has responsibility for the development and/or monitoring of articulation arrangements within the university? .....	
2B2 - Is there any difference in the organisation of local versus international articulation?	
2B3 - Who approves articulation agreements? [	
2B4 - What links (if any) exist between Articulation and Course Approval within the university? .....	
<u>Unstructured and developmental questions would be encoded separately</u>	

A spread sheet similar to the example given previously was then used to display and index these results.

**The course development process – Final course documentation**

**Structured Question**

- Are you familiar with how course approval documentation is prepared in your university?  
*[If the informant answered "No", none of the following semi-structured questions were asked and the researcher moved to the next set of questions. A number of informants, particularly in the administrative or senior management groups, who had no knowledge of how course documentation was prepared and could honestly answer "No" to this question]*

Justification for this question - All universities without exception require new course proposals to be fully documented (although what the word "fully" means appears to vary greatly from one institution to another). For this reason, the question "Does your university require course documentation?" is redundant and was not asked. At the same time, it was important to be certain of just how much the informant knew about this stage of the process. Thus, the HEW5 person who enters the data on the Student Record System may be familiar with her side of the work but know nothing about how the actual documentation is prepared, and it would be a waste of time to question her further on this issue.

### **Semi-Structured Questions** - *[Not every question was asked of every informant]*

- Who has responsibility for the final course documentation?
- What internal or external advice is provided to guide the course development process?
- What internal negotiations are mandatory (or alternatively strongly encouraged) before the course documentation process is complete?
- Who actually prepares the course documentation? *[Person, committee, etc]*
- Are these the same as those responsible for the oversight of the course once approved? *[And who might eventually become the course coordinator, course committee, etc]*
- Is everything done by institutional staff or are externals engaged for writing, editing, duplication, research or some other function?
- Who funds the preparation of the course documentation?
- What sum is normally set aside for the writing of course documents?
- *(if applicable)* At what stage (and how) are negotiations conducted with professional bodies or groups such as AACSB to ensure the acceptance of the course?
- What checks are conducted to ensure that the proposal is in conformity with government legislation and university policy?
- Are these checks independent of the course developers? *[ie; Conducted by the institution's Compliance Officers, Legal Branch, Planning Unit, etc?]*
- At what stage is information provided to university marketers, particularly the International Office? *[which needs the longest possible lead time for overseas marketing]*
- Who determines that the documentation is ready for submission to the university?

Justification for these semi-structured questions – While all Australian universities require course proposals to be fully documented there appears to be little if any information on how this is done, and no information whatsoever on how the task is funded or the disruption it may cause (with meetings, etc, as well as writing) to the already pressured teaching and research workload of staff. [It also appears that there is little reward for this task, even though the preparation of course documentation, if done well, is fully equivalent to the preparation of a conference paper or journal article in time and research activity]

Caution for the Researcher – TEQSA has placed increased emphasis on improvement to the quality of course documentation – one of the few physical artefacts that TEQSA auditors can check long after the approval process is complete – and can also use to see whether everything promised in the document is actually being delivered in the classroom [normally done by examining subject outlines and past assessment items – TEQSA auditors, by agreement with the NTEU, can only enter classrooms at the invitation of the staff member and even then would be there for such a short time that a decision would be impossible. For this reason TEQSA auditors rarely enter classrooms and prefer to work from documents]. The researcher will need to be careful that his enquiries on course documentation are not misunderstood, particularly in those universities where documentation has been wanting in the past, a defect brought to light in TEQSA reports.

### **Alternative Semi-Structured Questions**

*[These questions were asked if considered appropriate]=*

- Does the university make use of franchised course documentation? *[i.e. Documentation produced by someone else as Cisco Computing, the US Dept of Homeland Security, American Psychological Association, etc, which is not produced "in house" but simply modified to meet local formatting or professional registration requirements. There is far more of this material in use in Australian universities than is generally realized, even if it is market under the university's own brand]*
- If so, who negotiates for the use of this material?
- Is there a formal agreement?
- Who prepares the documentation for local approval?
- How does the university market this material?
- How does the university distinguish this franchised material from similar products franchised to a competitor? *[Generally by adding something of its own to make the product distinctive]*

- Does the university acknowledge the use of this material in its advertising or elsewhere? [*The use of franchised material, particularly MOOC's from major overseas universities can sometimes give competitive advantage. At the same time this may look like "cheating" in the eyes of the public and possibly the academic community*]

Justification for these questions – There is increasing use of franchised (although I hope licensed and paid for rather than plagiarised!) course material across Australian higher education, something that can be picked up almost immediately by those working in Strategic Course Analysis. Virtually no formal study has been made of this, however, and most universities remain in a state of denial – “we know that others do it, but of course we don't!” It is felt important that the issue be addressed as part of the research, not to embarrass the institutions concerned but simply to place current procedures on record.

Caution for the Researcher – This is an extremely sensitive matter. The issue is not eased by the fact that I am aware of most of the institutions involved through my professional work on course analysis, although I am pleased to say the majority of these do so legitimately, paying license fees to the copyright holders and acknowledging the source, although not necessarily revealing this to their students. The franchising of course documentation from MOOCs, course material from major booksellers (Pearson, SAGE, etc) and other universities will need to be handled with caution and raised only when I feel that I have the confidence of informants.

The following template was used:

INFORMANT No..... DATE .....

**Structured Question**

3. Are you familiar with how course approval documentation is prepared in your university?.....  
[Yes = 1, No = 2, Vague knowledge = 3, No Reply or Don't Know = 0]

**Semi-Structured Questions** - [Not every question will be asked of every informant]

[The clarity of answers will be scored on a scale of 1 – 9. Zero indicates that a question was not asked]

- 3A1 - Who has responsibility for the final course documentation?.....
- 3A2 - What internal or external advice is provided to guide the course development process?
- 3A3 - What internal negotiations are mandatory (or alternatively strongly encouraged) before the course documentation process is complete? .....
- 3A4 - Who actually prepares the course documentation? [Person, committee, etc] .....
- 3A4 - Are these the same as those responsible for the oversight of the course once approved? .....
- 3A5 - Is everything done by institutional staff or are externals engaged for writing, editing, duplication, research or some other function? .....
- 3A6 - Who funds the preparation of the course documentation? .....
- 3A7 - What sum is normally set aside for the writing of course documents? .....
- 3A8 - At what stage (and how) are negotiations conducted with professional bodies or groups such as AACSB to ensure acceptance of the course? .....
- 3A9 - What checks are conducted to ensure that the proposal is in conformity with government legislation and university policy? .....
- 3A91 - Are these checks independent of the course developers? .....
- 3A92 - At what stage is information provided to university marketers, particularly the International Office? .....
- 3A83 - Who determines that the documentation is ready for submission to the university .....

**Alternative Semi-Structured Questions** [To be asked if considered appropriate]

- 3B1 - Does the university make use of franchised course documentation? .....
- 3B2 - If so, who negotiates for the use of this material? .....
- 3B3 - Is there a formal agreement? .....
- 3B4 - Who prepares the documentation for local approval? .....
- 3B5 - How does the university market this material? .....
- 3B6 - How does the university distinguish this franchised material from similar products franchised to a competitor? .....
- 3B7 - Does the university acknowledge the use of this material in its advertising or elsewhere? .....

*Unstructured and Developmental questions were coded separately*

**The accreditation process**

**Structured Question**

- Could you refresh me again on how courses are approved by the university?

Justification for this question – While this question would already have been raised (using different words) at the commencement it was deliberately asked again for five reasons;

1. It may be important to note any change between the first and the second response that may require amplification or further explanation or that derive from the development of greater rapport between the informant and the researcher. [Questions arising from this will be individual, and hence unstructured and coded separately]
2. The question suggests ignorance or forgetfulness on the part of the researcher - and hence a sense of helplessness, and a need for dependence on the informant - thus boosting the ego of the informant and placing them in a position where they may be willing to say much more.
3. The question may be important for determining the perspective of the informant.

[Is the informant a champion of the process, indifferent, or strongly opposed? Each could bias the responses provided]

4. The question brings discussion back to the core topic. {There would have been much talk already about articulation, work pressures during the writing stage, the intransigence of Deans, tight deadlines, lack of funding, and so on. These may take the interviews away from the topic, and the question is intended to refocus thoughts on the task in hand}
5. The ease with which the question can be answered relieves any mental fatigue that may have developed. The question provides the opportunity for the informant to speak about things (at length if required) without a great deal of thought or mental concentration.

### **Semi-Structured Questions**

- Is the documentation I have on course accreditation the most recent?
- Are there any significant departures from the document that occur in practice, either as the norm or the exception?
- What is the normal period for which courses are accredited by the university?
- Does the process for the reaccreditation of existing courses differ from that used for the accreditation of new courses, and if so how?
- What does the university consider to be a “major or significant change” to a course?
- What is the process for the approval of a major or significant change?
- How (and at what level) are individual subjects approved?
- Are there other matters I need to be told about the course approval process?

Justification for these questions – These questions relate specifically to the accreditation process and are intended to reveal matters that may not be clear from the published documentation. The questions are deliberately structured in the form of “one question that can be easily answered, one that may require more thought” in the hope that the ease with which the first question can be answered will encourage more information to be given in response to the one that follows. The last question is completely open ended, but has been included in the hope that once the informant starts talking in response to the questions immediately before they will be more expansive in their answers to this one

The following template was used:

**INFORMANT NUMBER** ..... **DATE** .....

**Structured Question**

3 - Could you refresh me again on how courses are approved by the university? .....  
[Response ranked 1 – 9 on clarity and importance]

**Semi-Structured Questions**

3A1 - Are the documentations I have on course accreditation the most recent? .....  
[Yes = 1, No = 2, Don't know =0]

3A2 - Are there any significant departures from the document that occur in practice, either as the norm or the exception? .....  
[All of the remaining questions ranked 1 – 9 in order of clarity and importance]

3A3 - What is the normal period for which courses are accredited by the university? .....

3A4 - Does the process for the reaccreditation of existing courses differ from that used for the accreditation of new courses, and if so how? .....

3A5 - What does the university consider to be a “major or significant change” to a course? .....

3A6 - What is the process for the approval of a major or significant change? .....

3A7 - How (and at what level) are individual subjects approved? .....

3A8 Are there other matters I need to be told about the course approval process? .....

These questions may lead to a large number of unstructured or developmental questions (using the model suggested by Wilson 2014) but these will be encoded separately

**The Course Accreditation Committee**

**Structured Question**

All Australian universities have a group to advise on the quality and fitness of proposed courses, and the question “Does your university have a Course Accreditation Committee (or equivalent under another name)” was considered redundant and not asked. Instead the researcher asked as the structured question for this theme “**How much do you know about the Course Accreditation Committee – the correct name was used based on institutional documentation –at your university?**”

Justification for this question – The question has been made ambiguous to see how the informant chooses to interpret it. On the one hand it could be taken to mean “How much do you know about the role and operation of the Course Accreditation Committee?” or on the other “Who are the people on your Course Accreditation Committee and what do they contribute”. The response given was used to determine which of the semi-structured questions that follow should be used.

If the respondent said that he or she knew little or nothing about the Course Accreditation Committee – information that would indicate more a poor choice of informant – the semi-structured questions that follow were not asked and the researcher proceeded to the next set of questions.

**Semi-Structured Questions (Set “A”)**

- Could you explain the role of the Course Accreditation Committee (or equivalent)?
- What are the terms of reference for this committee?
- Who does it report to? [Normally Academic Board or equivalent, but possibly to a DVC]
- How is the committee serviced? (i.e. Who appoints the Chair, who takes the Minutes, etc?)

- How does the Committee operate?
- Does the Committee examine existing programs presented for reaccreditation as well as new courses?
- Who prepares the agenda?
- What does the Committee look for when proposals are examined?
- Does the Committee require the course developer (or representative) to attend when proposals are discussed?
- What action does the committee take when a proposal is declined?

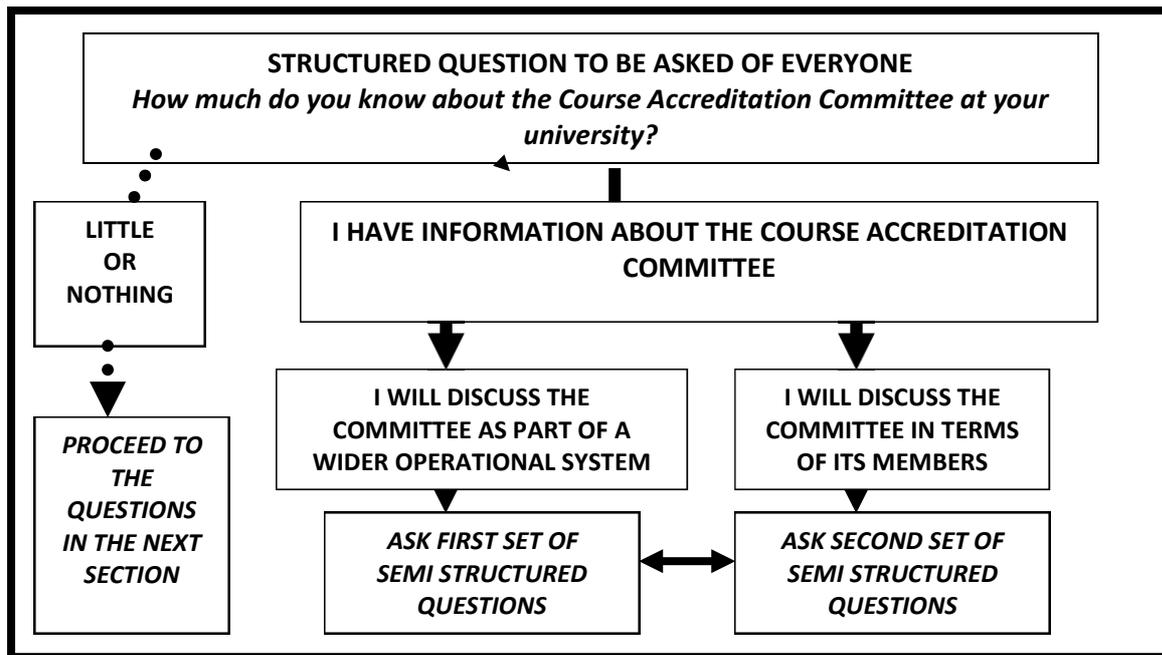
*[This is a trick question as Course Accreditation Committees rarely decline proposals particularly after they have passed through other filters such as Faculty Boards. In reality most committees simply indicate to the sponsor that their proposal is not quite ready and defer making any recommendation until the deficits are addressed. The purpose of the question is to test the knowledge of informants on the operation of these committees using the word (often a red rag to a bull) "declined".*

- How does the Committee make its recommendation to its superior?  
*[Does it simply send a copy of its Minutes with recommendations, send a complete copy of the course documentation, present nothing more than an oral report from the Chair, and so on]*
- Is there any appeal against the Committee's recommendation, and if so to whom?

**Alternative Semi-Structured Questions (Set "B")** *[Asked if the respondent seemed to prefer talking about members rather than the operation of the Committee]*

- Who are the members of this committee?
- How are they appointed?
- What is their duration of tenure? *[Is this the same for everyone]*
- Who is the Chair, and how was the Chair appointed?
- Can meetings be held in the absence of the Chair?
- Are any members "ex officio"?
- Is there an attempt to maintain cross institutional or gender representation in the membership, or simply to gain access to the best knowledge within the institution?
- Are there non-academics on the Committee and what is the basis of their appointment?
- Is there a representative from the Library, IT, Staff Development or a staff union?
- Is there a student representative (and if so, how is this person appointed)?
- Is training provided for members (and if so, by whom)?
- Is the work and/or membership of the Committee reviewed at regular intervals, and if so by whom?

Justification for these questions – As I was uncertain of the approach to be taken by informants I prepared two sets of semi-structured questions for this section, the first for those who seem more anxious to discuss the operation of the Committee (ie; those who view the accreditation committee as part of a wider system) and the second for those who wished to discuss it from the perspective of its members. These compartments were not watertight and questions from either set were asked if felt appropriate. [At the same time, it was not intended to ask every question of each informant.]



**Figure H-2 Initial Flowchart for Questions**

A template for the structured and semi-structured questions is provided below:

INFORMANT No.....

DATE.....

**Structured Question**

4 - How much do you know about the Course Accreditation Committee at your university?.....  
*[Rank knowledge on a scale of 1 – 9. If it is claimed that nothing is known rank = Zero]*

**Semi Structured questions**

4.A1 - Could you explain the role of the Course Accreditation Committee (or equivalent)? ....

*[Rank this and all subsequent questions 1 – 9. If nothing is known or no answer is given rank Zero]*

4A2 - What are the terms of reference for this committee? .....

4A3 - Who does it report to? .....

4A4 - How is the committee serviced? .....

4A5 - How does the Committee operate? .....

4A6 - Does the Committee examine programs presented for reaccreditation as well as new courses? .....

4A7 - Who prepares the agenda? .....

4A8 - What does the Committee look for when proposals are examined? .....

4A9 - Does the Committee require the course developer (or representative) to attend? .....

4A91 - What action does the committee take when a proposal is declined? .....

4A92 - How does the Committee make its recommendation to its superior? .....

4A93 - Is there any appeal against the Committee's recommendation, and if so to whom? .....

**Alternative Semi-Structured Questions**

4B1 - Who are the members of this committee? .....

4B2 - How are they appointed? .....

4B3 - What is their duration of tenure? *[Is this the same for everyone]* .....

4B4 - Who is the Chair, and how was the Chair appointed? .....

4B5 - Can meetings be held in the absence of the Chair? .....

4B6 - Are any members "ex officio"? .....

4B7 - Is there an attempt to maintain cross institutional or gender representation in the membership, or simply to gain access to the best knowledge within the institution? .....

4B8 - Are there non-academics on the Committee and what is the basis of their appointment? .....

4B9 - Is there a representative from the Library, IT, Staff Development or a staff union (etc)? .....

4B91 - Is there a student representative (and if so, how is this person appointed)? .....

4B92 - Is training provided for members (and if so, by whom)? .....

4B93 - Is the work and/or membership of the Committee reviewed at regular intervals, and if so by whom? ....

*Unstructured and Developmental Questions were coded individually*

**The Course Accreditation Committee as an exercise in "Shared Governance"**

**Structured Question** *[If not already asked]*

- Are there non-academics on your Course Accreditation Committee?

Justification for this question – Shared Governance involves a sharing of responsibility, and in the case of universities this includes those who support the teaching and research program as well as those who deliver it. All Course Accreditation Committees in Australian Higher Education contain at least one or more academics – in other words those who see students regularly, publish research, and are regarded as members of the academic community. The immediate purpose of this question is to ask "Who else is on the committee?" The researcher did not define what was meant by the term "non-academic" and left the interpretation of this phrase to the informant, a solution that gained different answers for the same university. At the same time the outcome was considered valuable as a reflection of how each informant viewed the role and nature of

academics in general, and thus provided insight into a number of his or her other responses. [Thus, did an informant classify a DVC as an “academic”, or perhaps the Chief Librarian, the Head of Staff Development, or the Head of the International Centre, none of whom teach or publish, even though all may be on the academic payroll?]

The ultimate purpose of this question was to raise the question of dominance, power and conflict within the Committee – a matter I dared not enquire into too openly lest it put informants off side. At the same time it was hoped to use this question to gain informants views on where power resided within the course accreditation process and the manner in which other groups that might become over dominant are controlled as this in turn was likely to have an effect on Risk Management.

### **Semi-Structured Questions**

- Are there persons external to the university on the Course Accreditation Committee? *[If so, who are these people, how were they placed on the Committee and why are they there?]*
- Who are the non-academics on your Course Accreditation Committee? *[Preferably with informants giving the name and position within the university]*
- Are the non-academic members appointed, elected or on the Committee because of the position they hold?
- Do any of these persons have an indefinite tenure? *[Most elected or appointed committee members normally have a fixed term of office. Do any of these “non-academics” hold office for an indefinite period, either because of their position or because of a decision by the institution?]*
- Do all of these people vote on decisions, and if so, do they have equal voting rights?
- Are there others who attend the meetings of the Committee on a regular basis who do not have voting rights? *[In certain cases, non-academics may be there as “advisors” rather than voting members. Thus, the Chief Librarian may attend all meetings and may speak on proposals but have no voice in the final decision]*
- Who prepares the agenda for meetings?
- Who distributes the agenda?
- Does this person have speaking or voting rights?
- Who records the Minutes?
- Who provides follow up by the Committee (virtually as Executive Officer)?
- Are there dominant leaders on the Committee? *[Those whose views are rarely challenged, either because of their status or power – Care was needed in asking this question]*
- Are there particular power blocks on the Committee? *[Again, great care was needed]*
- Does the Committee ever reach deadlock and, if so, how is this resolved? *[Once more, considerable discretion was needed in asking this question]*
- Can decisions be made by executive action, and if so by whom?
- What is the primary reason for making decisions in this manner?
- How are executive decisions reported to the Committee?
- How frequently are executive decisions made?
- Are procedures different for Distance or off campus courses?

Justification for these questions – It must be stressed from the outset that the researcher will use the greatest of discretion in asking a number of these questions as they may expose tensions that the institution is anxious not to make public. For this reason they are “staggered” from those easily answered to those requiring detailed insider knowledge. The questions themselves have been structured in a manner that will enable Abductive Analysis (See Appendix 2) to be applied if necessary.

The following template was used:

INFORMANT NO.....

DATE.....

**Structured Question - 5.** Are there non-academics on your Course Accreditation Committee?.....

[Yes = 1, No = 2, Don't know or didn't answer = Zero]

**Unstructured Questions**

5A1 - Are there any persons external to the university on the Course Accreditation Committee? .....

5A2 - Who are the non-academics on your Course Accreditation Committee? .....

5A3 - Are the non-academic members appointed, elected or there because of the position they hold? ....

5A4 - Do any of these persons have an indefinite tenure? .....

5A5 - Do all of these people vote, and if so, do they have equal voting rights? .....

5A6 - Are there others who attend the Committee who do not have voting rights .....

5A7 - Who prepares the agenda for meetings? .....

5A8 - Who distributes the agenda? .....

5A9 - Does this person have speaking or voting rights? .....

5A91 - Who records the Minutes? .....

5A92 - Who provides follow up by the Committee (virtually as Executive Officer)? .....

5A93 - Are there dominant leaders/ power blocks within the Committee? .....

5A94 - Does the Committee ever reach deadlock, and if so how is this resolved? .....

5A95 - Can decisions be made by executive action, and if so by whom? .....

5A96 - What is the primary reason for making decisions in this manner? .....

5A97 - How are executive decisions reported to the Committee? .....

5A98 - How frequently are executive decisions made? .....

5A99 - Are procedures different for Distance or off campus courses? .....

**Final Approval**

**Structured Question**

- Who gives the final approval to authorise a course?

Justification for this question – The researcher was interested in determining who informants believed has the final authority for the approval of courses. The word “authorise” was used deliberately in the question, as approval for a course may not be the same as authority to mount the course and recruit students, which was discussed in the following section. [In a number of universities a course is “legitimised” by Academic Board or equivalent, but it is then up to the faculty or senior management whether it is offered, due possibly to financial restraint, staff or resource shortages, market uncertainty, changes to the institution’s strategic plan, and so on. In the vast majority of universities the approval of a course gives no guarantee that the course will actually be offered, although if the program is not commenced within a set period – normally five years but sometimes less – approval is withdrawn and the proposal lapses

**Semi-Structured Questions**

- Does approval require endorsement by the Governing Council (or equivalent) as well as by Academic Board? [In the majority of universities, the Governing Council must approve the name of the award but not its content. In other cases, the power to approve the award title as well as the content has also been delegated to the Academic Board or equivalent. This is an important question for gaining insight into the power structure of the university.]
- Who registers the course with the Commonwealth?
- Who places the course on the CRICOS register?
- Who enters the course on the student record system and how and when is this done?
- Who is responsible for the inclusion of the course in the university handbook?
- Who informs the university marketing division of the decision (and who monitors how the marketing division may use this information)?
- Who is responsible for the archiving of records, and how is this done? [It may be important from the perspective of power and control to determine whether this is done centrally or in the faculties]

Justification for these questions – A need was felt to tread cautiously in assessing power and control within the institutions under investigation, and it was believed best to do this by asking what appeared to be neutral questions which collectively might generate the data sought

Even if this was not the case the information requested from these questions was not readily discovered from published documentation and it was thought important for this aspect of the internal workings of each institution to be investigated, compared and recorded.

The following template was used:

INFORMANT No .....	DATE .....
<b>Structured Question</b>	
6. Who gives the final approval to authorise a course? .....	
<i>[Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]</i>	
<b>Semi-Structured Questions</b>	
<i>[Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]</i>	
6A1 - Does approval require endorsement by the Governing Council (or equivalent) as well as by Academic Board? .....	
6A2 - Who registers the course with the Commonwealth? .....	
6A3 - Who places the course on the CRICOS register? .....	
6A4 - Who enters the course on the student record system and how and when is this done? .....	
6A5 - Who is responsible for the inclusion of the course in the university handbook? .....	
6A6 - Who informs the university marketing division of the decision (and who monitors how the marketing division may use this information)? .....	
6A7 - Who is responsible for the archiving of records, and how is this done? .....	
<b>These semi-structured questions are expected to give rise to a number of unstructured and developmental questions, but these will be coded separately</b>	

### Mounting the Course

#### Structured Question

- What happens between the approval of a course and the first lecture?

Justification for this question – Most course approval documentation ends with the approval of the course. A great deal must occur, however, before the first students can be enrolled and lectures commence. The purpose of this question was to fill this gap in knowledge for both specific institutions and the sector as a whole. [As many things can intervene between approval and commencement the researcher viewed course approval as extending to the point where teaching begins rather than ending when the proposal is approved]

#### Semi-Structured Questions

- Is there a separate administrative procedure for mounting courses [*i.e; resourcing, timetabling, staffing, advertising, and enrolling students*] once they are approved?
- Who is responsible for this procedure? [*Course coordinator, Faculty, Central Administration, a combination of all of these, etc*]

- Who advises the University Admissions Centre, Ozjac, and other external bodies of details?
- Who determines fees and/or quotas for the program?
- Who selects staff (academic, professional and administrative) for the course?
- At what point is the selection of staff done?
- Who allocates rooming and the timetable?
- How is rooming and the timetable handled?
- Who advises the Library and other support bodies?
- Who advises potential students?
- Who handles general enquiries for the course?

### **Alternative Semi-Structured Questions**

*[The questions in the previous section are essentially operational and may not be answerable by certain informants. A second set of questions has been prepared reflecting the planning and strategic management aspects of mounting a new course]*

- If other courses are to be closed to accommodate the new program, how is this done?
- Who counsels residual students or disgruntled staff?
- Who advises professional bodies and other outside agencies (Admissions Centre, etc) that no further students will be admitted to these courses?
- Who takes possession of any resources that may be released by this discontinuation? *[Equipment, Intellectual Property, Records, etc]*
- Must these resources be used on the replacement program or can they be redeployed elsewhere? *(within the School or Department, Faculty, or elsewhere within the University)*
- Who determines whether pre-admission projections are likely to be met (turnstile numbers, census figures, attrition factors, rooming and staffing provision, etc)?
- Who assesses the ultimate viability of the program (either prior to census date or after)?
- When and how is this done?
- What is done when a commencing program is clearly unviable? Is there a standard procedure for taking action under these circumstances?

Explanation for these alternative semi-structured questions – These questions were intended for those with a more strategic view of the actions that occur between the approval of a course and its commencement. While there is a separate set of questions dealing with the closure of courses, the questions above relate specifically to the early closure of new courses, particularly when they fail to attract students or are otherwise unviable.

The following template was used:

INFORMANT No ..... DATE .....

**Structured Question**

7 - What happens between the approval of a course and the first lecture? .....  
[Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]  
[If Zero proceed to the next set of questions]

**Semi-Structured Questions**

[Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]

- 7A1 - Is there a separate administrative procedure for mounting courses once they are approved? ....
- 7A2 - Who is responsible for this procedure? .....
- 7A3 - Who advises the University Admissions Centre, Ozjac, and other external bodies of details? .....
- 7A4 - Who determines fees and/or quotas for the program? .....
- 7A5 - Who selects staff (academic, professional and administrative) for the course? .....
- 7A6 - At what point is the selection of staff done? .....
- 7A7 - Who allocates rooming and the timetable? .....
- 7A8 - How is rooming and the timetable handled? .....
- 7A9 - Who advises the Library and other support bodies? .....
- 7A81 - Who advises potential students? .....
- 7A92 - Who handles general enquiries for the course? .....

**Alternative Semi-Structured Questions**

[Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]

- 7B1 - If other courses are to be closed to accommodate the new program, how is this done? .....
- 7B2 - Who counsels residual students or disgruntled staff? .....
- 7B3 - Who advises professional bodies and outside agencies (Admissions Centre, etc) that no further students will be admitted to these courses? .....
- 7B4 - Who takes possession of any resources that may be released by this discontinuation? .....
- 7B5 - Must these resources be used on the replacement program or can they be redeployed elsewhere? ...
- 7B6 - Who determines whether pre-admission projections are likely to be met (turnstile numbers, census figures, attrition factors, rooming and staffing provision, etc)? .....
- 7B7 - Who assesses the ultimate viability of the program (either prior to census date or after)? .....
- 7B8 - When and how is this done? .....
- 7B9 - What is done when a commencing program is clearly unviable? Is there a standard procedure for taking action under these circumstances? .....

**These questions may give rise to other unstructured or developmental questions which were encoded separately**

**Reviewing Courses**

**Structured Question**

- Are you familiar with the course review procedure at your university?  
[If the answer is "No" proceed to the next set of questions]

Justification for this question – As all Australian universities are required by TEQSA to have a system of course review there is no point in asking whether an informant's university has one – of course it has! A more important point is whether the informant is familiar with the process and can give insight into it. [Most universities publish details of their course review process on their website, although this is often simply a

confirmation that reviews are being held rather than information on how they are conducted. The purpose of the questions that follows is to confirm the published information and where necessary fill in the gaps]

### **Semi-Structured Questions**

- Could you explain the process of course review at your university?
- Does your university regard course review as a formal part of the approvals process? [*Most do, but because some may not and see it as a separate issue the question might still be asked*]
- What is the normal period of approval?
- Can this period be shortened or extended, and if so under what circumstances?
- Who is responsible for monitoring the cyclic review of courses?
- Who conducts the actual review?
- What additional documentation is required for the review of courses?
- What factors are considered when courses are reviewed?
- Does the review consider the quality of teaching and delivery in addition to other factors?
- Is student feedback considered?
- Is external advice (*for example advice from an external advisory committee*) required?
- Is advice from employers or professional registration bodies required?
- Is the advice given by externals regarded as advisory or mandatory?
- How long before the expiry of approval are courses reviewed?
- What action is taken if a program is considered unsatisfactory and further approval is denied?

Caution for future researchers – This is an extremely controversial area as institutions are torn between the risk management requirements of TEQSA, the statistical evidence from the past (normally supplied by university planning bodies), current and predicted change in the workplace, the danger of obsolescence and irrelevance in the light of advancing knowledge, and the university's business and strategic plans for the future. There is also a range of industrial issues, including the action to be taken with under performing or unsatisfactory staff should courses be found inadequate. In short, the reaccreditation of courses is a minefield and the researcher needs to be extremely careful to be seen as neutral, professional and impartial.

The template below was used:

INFORMANT NO ..... DATE .....

**Structured Question**

8- Are you familiar with the course review procedure at your university?.....  
[Yes = 1, No = 2, Don't know, Question not asked on No Reply = Zero]  
[If Zero proceed to the next set of questions]

**Semi-Structured Questions**

[Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]

- 8A1 - Could you explain the process of course review at your university? .....
- 8A2 - Does your university regard course review as a formal part of the approvals process .....
- 8A3 - What is the normal period of approval? .....
- 8A4 - Can this period be shortened or extended, and if so under what circumstances? .....
- 8A5 - Who is responsible for monitoring the cyclic review of courses? .....
- 8A6 - Who conducts the actual review? .....
- 8A7 - What additional documentation is required for the review of courses? .....
- 8A8 - What factors are considered when courses are reviewed? .....
- 8A9 - Does the review consider the quality of teaching and delivery in addition to other factors? .....
- 8A91 - Is student feedback considered? .....
- 8A92 - Is external advice (for example advice from an external advisory committee) required? .....
- 8A93 - Is advice from employers or professional registration bodies required? .....
- 8A94 - Is the advice given by externals regarded as advisory or mandatory? .....
- 8A95 - How long before the expiry of approval are courses reviewed? .....
- 8A96 - What action is taken if a program is considered unsatisfactory and further approval is denied? .....

**Unstructured and Developmental questions that arise were coded separately**

**Relocating or Discontinuing a Course**

**Structured Question**

- Are you familiar with the procedures through which courses are relocated from one centre to another, or discontinued completely by your university?  
[If "No" proceed to the next set of questions]

Justification for this question - The termination of a course represents the end of the approvals process. There is little explanation of the procedures for doing so in most of the course documentation published by the universities, and this question was asked to see if an informant is familiar with the procedure (and if so to explain it to the researcher) [There is no point in asking informants "Does your university discontinue courses?". All universities discard old, ineffective, unteachable or obsolete programs, or awards that no longer attract students, and to ask such a question would invite ridicule. At the same time the question of how institutions discontinue a course – or relocate it from one place to another (a milder form of discontinuation) formed an important component of the research.]

**Semi-Structured Questions**

- Is discontinuation (or the relocation of a course from one centre to another) considered part of the course accreditation process?
- How are courses discontinued or relocated?
- Who gives approval to relocate or discontinue a course?
- Is Academic Board (or equivalent) approval necessary to close or relocate a course?

- What action is taken to notify Canberra when a course is discontinued [*particularly when this means that the university will no longer offer a particular discipline. Approval from Canberra is required before the latter action can be taken*]
- Is it possible for courses to be suspended rather than completely discontinued?
- If so, is there a maximum period of suspension after which the course must be reinstated or discontinued?
- Is any approval required for the reinstatement of a suspended course?
- What documentation is required when a course is being suspended, relocated or discontinued?
- What arrangements are made for residual students [*Particularly where a course is being relocated as opposed to when it is being discontinued?*]
- What discussions occur with interested parties (professional bodies, Canberra, clinical placement providers, staff, current students, etc) prior to discontinuation or relocation?
- Are alumni from the course consulted? [*Some alumni seem to feel that once their award is discontinued it loses its value as a qualification, as in the case of the Diploma of Nursing versus the Bachelor of Nursing*]
- If so, how is this consultation done, and is there generally any opposition?
- What advice is given to Student Administration or other university units of the transfer or discontinuation (and how early is it given)?
- What advice is given to university marketers (and what are they expected to do with this advice)?
- What advice is given to the university community (including students in other awards)?
- What advice (if any) is given to other institutions? [*Particularly articulation partners*]
- What advice is given to the public, careers advisors and/or potential students?
- Are procedures any different when Distance or off campus courses are discontinued?

Caution for future researchers– This has become a highly contentious issue as universities review their program portfolio with a view to cutting costs, and the researcher will need to tread warily. It is strongly suspected that there may be a number of cases in which programs are (or are believed to have been) discontinued or relocated for political rather than financial or academic reasons (or alternatively are being deliberately starved of resources, publicity and good accommodation, which achieves much the same end) and the researcher will need to steer clear of local gossip, feelings and emotions. To do this, the researcher must stress the point that he is not interested in why courses are closed, only how that closure is accomplished.

The template below was used:

INFORMANT No ..... DATE .....

### **Structured Question**

9 - Are you familiar with the procedures through which courses are relocated from one centre to another, or discontinued completely by your university? .....

[Yes = 1, No = 2, Not asked (possibly because of time) or not answered = Zero]

### **Semi-Structured Questions**

Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]

9A1 - Is discontinuation (or the relocation of a course from one centre to another) considered part of the course accreditation process?

9A2 - How are courses discontinued or relocated?

9A3 - Who gives approval to relocate or discontinue a course?

9A4 - Is Academic Board (or equivalent) approval necessary to close or relocate a course?

9A5 - What action is taken to notify Canberra when a course is discontinued or relocated?

9A6 - Is it possible for courses to be suspended rather than completely discontinued?

9A7 - If so, is there a maximum period of suspension after which the course must be reinstated or discontinued?

9A8 - Is any approval required for the reinstatement of a suspended course?

9A9 - What documentation is required when a course is being suspended, relocated or discontinued?

9A91 - What arrangements are made for residual students?

9A92 - What discussions occur with interested parties (professional bodies, Canberra, clinical placement providers, staff, current students, etc) prior to discontinuation or relocation?

9A93 - Are alumni [*ie; past graduates*] from the course consulted?

9A94 - If so, how is this consultation done, and is there generally any opposition?

9A95 - What advice is given to Student Administration or other university units of the transfer or discontinuation (and how early is it given)?

9A96 - What advice is given to university marketers (and what are they expected to do with this advice)?

9A97 - What advice is given to the university community (including students in other awards)?

9A98 - What advice (if any) is given to other institutions? [*Particularly articulation partners*]

9A99 - What advice is given to the public, careers advisors and/or potential students?

9A991 - Are procedures any different when Distance or off campus courses are discontinued?

Unstructured and Developmental questions were encoded individually

## **Questions on Risk Management**

### **Structured Question**

- Could you tell me how Risk is assessed when courses and subjects are presented for accreditation?

Justification for this question – This question was intended to elicit five things:

- What the informant understood by the word “Risk”
- Their knowledge of Risk as they might define it
- Their understanding of the risk management policy of their university
- Who they believed responsible for Risk in course approval
- How informants see risk management interacting with the course approvals procedure of their university

There is no point in asking “Does your university have a Risk Management Policy?” All Australian universities are required by TEQSA to have such a policy and to follow it diligently. The key question is how informants see this policy applying to themselves, and subsequently to course accreditation

### **Semi-Structured Questions**

- What do you mean by “Risk”?
- To what risks do you see your university exposed?
- How does your university control or monitor risky behaviour?
- Is Risk something discussed openly in your university?
- Are you familiar with the university’s risk management policy?
- Who is responsible for Risk in your university? (*Either name or office*)
- In what unit of the university is this person located?
- What is their primary role?
- What is the involvement of the university’s legal unit in Risk Management?
- What risks do you feel your courses and subjects are most exposed to?
- Are these risks preventable? (If so, “How are they avoided or alleviated?”)
- Who is responsible for compliance with legislation, etc? (*Name or office*)
- Is the compliance person linked to the person responsible for Risk Management?
- How does Risk Management interact with course accreditation in your university?
- Is there anything in the terms of reference of your course accreditation committee that makes them responsible for Risk?
- What action can your course accreditation committee take if it suspects unnecessary risk in a proposal?
- Has this action ever been taken?
- What is the involvement of the person responsible for risk in the university with course accreditation?

Informant No.....

Date.....

Structured Question –

10 Could you tell me how Risk is assessed when courses and subjects are presented for accreditation? [Yes = 1, No = 2, Not asked (possibly because of time) or not answered = Zero]

**Semi-Structured Questions**

Grade 1 – 9 according to level of knowledge. Don't know, didn't ask, or no reply = Zero]

10A1 What do you mean by "Risk"?

10A2 To what risks do you see your university exposed?

10A3 How does your university control or monitor risky behaviour?

10A4 Is Risk something discussed openly in your university?

10A5 Are you familiar with the university's risk management policy?

10A6 Who is responsible for Risk in your university? (Either name or office)

10A7 In what unit of the university is this person located?

10A8 What is their primary role?

10A9 What is the involvement of the university's legal unit in Risk Management?

10A91 What risks do you feel your courses and subjects are most exposed to?

10A92 Are these risks preventable? (If so, "How are they avoided or alleviated?")

10A93 Who is responsible for compliance with legislation, etc? (Name or office)

10A94 Is the compliance person linked to the person responsible for Risk Management?

10A95 How does Risk Management interact with course accreditation in your university?

10A96 Is there anything in the terms of reference of your course accreditation committee that makes them responsible for Risk?

10A97 What action can your course accreditation committee take if it suspects unnecessary risk in a proposal?

10A98 Has this action ever been taken?

10A99 What is the involvement of the person responsible for risk in the university with course accreditation?

Unstructured and Developmental questions were encoded individually

**Concluding Issue**

**How will course accreditation change in the future?**

**Structured Question**

- How do you see course accreditation changing in the future?

Justification for this question – This question was deliberately left vague and it was up to the respondent to decide whether it meant "How do you see course accreditation at this university changing in the future?" or alternatively "How do you see course accreditation across the sector changing in the future?" The informant may also choose to explain how they see their own role in the process changing in the future, and for this reason questions from all three semi-structured sections may be asked.

[The researcher again stresses that it was never his intention of asking all questions of all informants, and the provision of such a vast number of questions is for indexation purposes only. If a question was answered it was encoded. If it wasn't asked (or if the informant didn't know or give no reply) the cell was coded "Zero". It was anticipated that many of the cells on the spread sheet would be encoded "Zero" as time would prevent the questions being asked]

### Semi-Structured Questions

#### **[Set "A" where the informant chooses to discuss course accreditation in their own university]**

- Is the current process too long, too expensive or too demanding?
- Are decisions currently being made by the wrong people?
- Is the current process too divisive? *[The researcher is aware of the adversarial nature of certain course committees, and the danger of personalities rather than programs entering into the equation]*
- Is the current process too faculty centred? *[Or "too senior executive centred?" etc]*
- Is the current process unfair to students?
- Is the current process unfair to staff?
- Does the current process really filter out unsatisfactory proposals?
- Does the accreditation process ensure that what is approved is actually taught in the classroom?

#### **[Set "B" where the informant chooses to discuss course accreditation in general]**

- Current procedures vary widely from university to university. Is this a weakness?
- Do you see greater uniformity being imposed on the sector? *[Either by TEQSA, local self regulating groups such as Universities Australia, international authorities, such as the Council of Europe (Bologna), or accreditation agencies such as AACSB?]*
- Can you foresee a centralised course accreditation process, similar to the one conducted in New Zealand by the National Qualifications Authority?
- If so, would you see this being run by the Government or by the Universities themselves? *[In other words, by peer review or external authority]*
- Should there be a greater role for employers, end users, or other stakeholders in the course accreditation process?
- Is there a need for improvement to the gender balance in course accreditation? *[At a time when such a large proportion of staff and students are female, course accreditation decision makers remain predominantly masculine. Does this disadvantage women?]*
- Is there a need for greater input from national student bodies? *[While individual universities may have student representatives on their accreditation committees and on Academic Boards, the voice of organized students – NUS, etc – is rarely heard. Is this a good thing?]*
- Is there a need for greater transparency of process across the sector?
- Is course accreditation predominantly an exercise in Risk Management as TEQSA has suggested, or is it something more or other than this?

#### **Set "C" – where informants choose to talk about their own role – or the role of others doing the same work - in the process**

- How would you see your role changing in the future?
- Is this a good thing? Why?
- How quickly do you see your role changing?
- If you see your role being abolished who (if anyone) would do the same work?
- Does course accreditation take up too much of your time, possibly at the expense of your other responsibilities?
- Is there any tension between your role and the academics in your university? *[More likely to be asked if the informant is a member of the non-academic staff]*
- Is there any tension between your own role and the administrative staff in your university? *[More likely to be asked if the informant is a member of the academic staff or the university executive]*
- Would it be desirable for this tension – if present - to be reduced? *[If so, how could it be done?]*
- Do you see future regulators (such as TEQSA or its successors) telling you how to do your job in the future?

The following template was used:

Informant No .....	Date.....
<b>Structured Question</b> – 10. How do you see course accreditation changing in the future? .....	
<i>Code 1 if question is asked, Code Zero if the question is not asked or if the informant makes no reply</i>	
<b>Unstructured Questions (Set “A”)</b> <i>Grade 1 – 9 e. Don’t know, didn’t ask, or no reply = Zero</i>	
11A1 - Is the current process too long, too expensive or too demanding?	
11A2 - Are decisions currently being made by the wrong people?	
11A3 - Is the current process too divisive?	
11A4 - Is the current process too faculty centred? <i>[Or “too senior executive centred?” etc]</i>	
11A5 - Is the current process unfair to students?	
11A6 - Is the current process unfair to staff?	
11A7 - Does the current process really filter out unsatisfactory proposals?	
11A8 - Does the accreditation process ensure that what is approved is actually taught in the classroom?	
<b>Unstructured Questions (Set “B”)</b>	
11B1 - Current procedures vary widely from university to university. Is this a weakness?	
11B2 - Do you see greater uniformity being imposed on the sector?	
11B3 - Can you foresee a centralised course accreditation process, similar to the one conducted in New Zealand by the National Qualifications Authority? Why?	
11B4 - If so, would you see this being run by the Government or by the Universities themselves?	
11B5 - Should there be a greater role for employers, end users, or other stakeholders in the course accreditation process?	
11B6 - Is there a need for improvement to the gender balance in course accreditation?	
11B7 - Is there a need for greater input from national student bodies?	
11B8 - Is there a need for greater transparency of process across the sector?	
11B9 - Is course accreditation predominantly an exercise in Risk Management as TEQSA has suggested, or is it something more or other than this?	
<b>Unstructured Questions (Set “C”)</b>	
11C1 - How would you see your role changing in the future?	
11C2 - Is this a good thing? Why?	
11C3 - How quickly do you see your role changing?	
11C4 - If you see your role being abolished who (if anyone) would do the same work?	
11C5 - Does course accreditation take up too much of your time, possibly at the expense of your other responsibilities?	
11C6 - Is there any tension between your role and the academics in your university?	
11C7 - Is there any tension between your own role and the administrative staff in your university?	
11C8 - Would it be desirable for this tension – if present - to be reduced?	
11C9 - Do you see future regulators (such as TEQSA or its successors) telling you how to do your job in the future?	
<u>Unstructured or Developmental questions were encoded separately</u>	

## Appendix I - Absorption/Absorption Test

### ***Extract from my book on Research Data Analysis (2014) to explain Absorption Tests following interviews***

This method of analysis involves the researcher making an attempt immediately after each interview (or after exposure to other primary data) to recall everything that he or she has seen or been told without the benefit of any notes (etc) that might have been made at the time. In other words, as soon as a researcher emerges from an interview or an observation, he or she should jot down the points that have stuck in their mind, essentially as a test of what has been *absorbed* from exposure to the source or informant. When compared to the interview transcript or other notes this may reveal bias or “selective hearing” on the part of the researcher, a concentration on particular information while other items of importance were overlooked, or again a complete misunderstanding of what was said or shown to the researcher.

It is important that this “self analysis” be committed to writing as early as possible without any reference to (and kept completely separate from) the interview transcript itself. The written recollection of the researcher should later be compared to the transcript, noting the points made in the interview that might have been overlooked by the researcher (i.e.; those things he or she “failed to absorb” during the interview), those things possibly not said by the informant but introduced by the researcher to fill in missing gaps [See Abductive Data above\*], or those the researcher may have chosen to reject by creating a mental block.

The concept of “absorption” as a test of the researcher comes from Marketing where the technique is used to assess how much of an advertisement has been “absorbed” (i.e.; *remembered*) by the average reader or viewer and how much of what was absorbed is likely to have been forgotten quickly. [i.e.; *A make of motor vehicle may be advertised by a scantily clad bathing beauty. How many will remember – or even notice - the brand of car in comparison to the distraction of the gorgeous model?*]

The method is used in Strategic Course Analysis as a means for recording the “first impression” of the practitioner [in other words the points that stand out in an initial reading of a course proposal - something that may reveal the bias or prejudice of the assessor] before a detailed investigation is made.

*\*Above in this extract as the entries are in alphabetical order, but below in these notes – See Appendix 2*

## Appendix J - The Conduct of Research into The Inner Workings of Australian Universities

There are few precedents for the conduct of research into the inner workings of Australian universities (Swansson et al. 2005). While there have been many studies of various aspects of Higher Education in this country, almost all have concentrated on broad and non-institutional issues, with few researchers brave enough to investigate individual providers (Dooly 2009).

My PhD included a comparison of course accreditation procedures across the sector. This has involved the interview of senior university staff where specific aspects of institutional policy were discussed. I thought at first that it would be easy to arrange these interviews – one would simply e-mail to the person involved, make arrangements to see them and, after a brief introduction, they in turn would discuss the strengths and weaknesses of their institution's procedures quite freely with the researcher. In reality it has never been that simple. The model on which I had originally based my interview strategy (the study by Nurmi & Passio (2007) of Entrepreneurship in Finnish Universities) proved defective as although these writers explained their the procedures for interviewing academics in some detail, their work dealt with the relationship between institutions and external partners rather than with the internal workings of the universities themselves. After one or two rebuffs – staff simply told me that they would be unable to see me for an unspecified period - I was forced to seek a different approach.

My professional work in course assessment – a task I continued in parallel with my PhD – offered numerous opportunities for a change in perspective, even though it sometimes took me into fields (to the horror of my supervisors!) that might be considered less relevant to my topic. I had been working through a number of the Journalism courses offered by interstate universities early in the research process where I found a number of references to the interview of “hard to contact” persons that I felt could be adapted to arranging discussions with reluctant academics. The most important of these were Williams (2012) and Welch (2007) which I will discuss in detail shortly. I also raised the question of procedures with my colleagues in higher education administration and received advice on how my approach might be deficient and how future difficulties could be avoided.

The book by Williams (2012) - *Researching Power, Elites and Leadership* - continues the theme established by Moyser & Wagstaffe (1988) in their seminal work on *Research Methods for Elite Studies*, in which they indicate that a slightly different approach is needed for breaking through the barriers erected by the rich, famous and powerful for their self protection. While it remains possible to gain access to these people – and one generally finds them far more receptive than others when it comes time for interview – this has to be done in a particular way, or one finds that the path is continually blocked by “protectors” who feel it their duty to keep strangers away. Williams suggests that one of the tools used most frequently (and often unconsciously) by researchers seeking to interview the “common” (i.e; “unimportant”) person is flattery. An informant is both pleased and surprised that their views are being sought on a particular topic, as generally no one asks their opinion. If the researcher is associated with an elite organization, such as a university, people tend to be more than willing to co-operate in the hope of “gaining status by association” (page 209)

People in hospital, under house arrest or in prison may be happy to pass the time with an interviewer.....[but the others, by implication rarely need the same catharsis] (page 209)

Williams summarises the difficulties of gaining access;

The first access problem is often to get past gatekeepers and spokespeople. There may be a series of different gatekeepers to negotiate in different ways. Celebrities often employ PR staff who assess the publicity cost benefit of an interview, and make up any perceived deficit by charging a fee for brief access.....In non-Western contexts mentioning family connections and status is often essential, and it might be considered bad manners not to do this as it warns that the researcher might have prior knowledge. But in a Western setting this approach could be counterproductive, and viewed as improper use of connections... (page 209)

If one can get past the gatekeepers, the next difficulty faced by the researcher is the approach to be taken in seeking contact with one's informant.

The persona of the researcher – the identity issue – is important. Might it be best to adopt a Journalistic, a Therapeutic, or an Investigative style? This “self presentation dilemma” means that the benefits of appearing to be a knowledgeable insider need to be balanced against being an amateur outsider who is keen to learn... There is usually only one chance to present the persona of the interviewer appropriately. Thoughtful planning – including finding out who has gained access previously and the type of people the interviewee likes – is worthwhile (Pages 210/212)

In other words, is the researcher to act as a “know everything already” person and thus frighten the informant with their hidden knowledge, or to act as a complete ignoramus and then be considered a waste of time by the respondent? Essentially it becomes a question of “what to ask?”. Williams stresses that there are few powerful or time poor informants who are likely to agree to an unstructured interview. One has to tell them in advance exactly what one wishes to discuss and must be certain to keep the interview within these bounds. This precludes any “off the cuff” questions, despite the curiosity of the researcher. Indeed, those who ask unscheduled questions may find the interview terminated by the informant's “minders”. (Williams warns that unless there is considerable trust between the respondent and the researcher most interviews with the rich and famous are likely to be attended by “minders”. These people normally say little but stand to one side and constantly advise the informant through movement, facial gesture and body language. Indeed, this is one of the many things that those undertaking this form of research are encouraged to note, as the anxiety of minders when particular issues are raised may well form part of the data collected. I will explain how this is done through an absorption test a little later.)

Williams suggest that the prior disclosure of questions is critical. Those who have gained riches or power tend to be most conscious of their self image and are anxious to avoid appearing ill informed or ignorant under any circumstances. Thus, if a question cannot be answered directly or is likely to cause embarrassment through the informant's inability to explain the fine detail, it may be best not to ask it in the first place.

This does not mean that one cannot ask “tricky” questions – indeed not to do so may invalidate the whole point of the research. What it does mean is that difficult or controversial questions must be approached indirectly, with the researcher asking the informant's advice on the best person to consult rather than seeking an immediate answer from their lips. (And such a question must always be foreshadowed in advance – it cannot be sprung suddenly on an unsuspecting informant)

Thus, adapting William's methodology, suppose one wished to enquire about an embarrassing scandal in a university (let's suppose that a number of students have been paying invigilators to allow cheating in exams). One should never ask a senior officer what he or she knows about it – they may know a great deal but be reluctant through personal embarrassment to tell you anything – one should always ask who the best person might be with whom one could discuss the incident. This approach enables the interviewee to get themselves off the hook by avoiding the issue completely or alternatively to shift the blame and responsibility elsewhere.

It is the same with the inner workings of a university. Most staff have a loyalty to their institution and (unless morale is very bad) are reluctant to allow its dirty linen to be washed in public. At the same time, questions may need to be asked that cannot be avoided. The solution suggested by Williams is to treat the informant as the victim, never as the perpetrator. Applying this to a university, the staff member concerned should also be regarded as the victim of the system within which they are forced to work. There may well be something wrong with the system, but it must never be the fault of one's informant. It just their unfortunate lot to have to work within an unsatisfactory environment, and they are to be commended with sympathy for their patience, persistence and dignity in the face of hardship.

Williams draws a distinction, however, between cases where the informant is in fact the innocent party and where they are not. [If both parties are aware that the person to whom one is talking is guilty, but try to gloss it away, the sympathy will be seen as false and the interview will collapse.] If the informant is not an innocent party – something that can sometimes occur in a university – the researcher should appear to know nothing about what is being described and get the respondent to explain everything in their own words. These should then be noted down with appropriate words of consolation but without contradiction. If on the other hand, the informant is really blameless the researcher should reveal that he or she knows this to be a fact and can make his or her expressions of sympathy more genuine.

The key point that Williams makes is that one should never argue with an informant of this type. If they choose not to tell you something, one should not seek a prescriptive answer (as might occur with cross examination in a court) but should approach the matter indirectly, usually from the perspective of personal ignorance. (Thus, in interviewing the rich and famous one should never ask for details of their wealth – much less where it came from. One should express admiration for the person's ability to accrue wealth which you could never have, and then let them tell you (*which they will through boasting – the rich and powerful are always proud of their achievements*) how much they possess and how they might have acquired it. [Transferred to a university context this means that one should never cross examine an academic. If they obviously know more than they are willing to tell you admit your own ignorance and then let them enjoy telling you more about it]

Williams concludes by reminding his readers of the insecurity that always surrounds the rich and famous and suggest that this can be made an instrument for securing an interview. Those who have money (or power for that matter) are always frightened of losing it and will do everything possible to ensure its retention. Thus, they will see strangers quite readily if this will keep them where they are and sustain the status quo. In the case of academics (whom Williams doesn't mention, but who can be targeted as an extension of this principle) the equivalent fear is loss of status. One of the forces that keeps the academic community honest is the fact that if anyone says or does something considered inappropriate by peers, they immediately lose the respect of their colleagues (ICAI 2015) and this is something no one wants. For this reason, any threat to an academic's standing will be immediately challenged by the person concerned. This can be used to one's personal advantage by suggesting to their gatekeeper that perhaps the person is too busy (or too important) to spend time with a mere student, something that in a university will elicit an immediate response.

Williams, who admittedly is not writing about the interview of academics, makes no mention of one point that is vital for the conduct of research within Australian universities. The vast majority of Australian universities have a policy about the conduct of research on campus by those who are not members of the university, and it is essential to get a copy of this policy and to understand its requirements - which can vary greatly from one institution to another - before approaching anyone. While these policies focus more on the interview of students by outsiders or the use of university labs or other facilities by external parties – and have obviously been written with this in mind - they also cover the interview of academics and other persons (including those employed by contractors, such as cleaners, food service providers, grass cutters or security staff if these interviews are to be interviewed on campus) and must be adhered to throughout the research. While it is not always easy to locate or become familiar with these policies – and one knows that even staff employed by the university concerned find this difficult at times – the best thing is to phone the secretary of the DVC Research (or equivalent) at that university and ask them to send you a copy. The document should be discussed with your supervisor before completion (*in many cases universities will require the signature of your supervisor as the "Principal Researcher", and may also require your supervisor to give confirmation of your enrolment and ethics approval*) and any restriction that may be imposed on your research should be noted. The form may also require insurance against loss or damage – remembering that permission to conduct research on campus more generally involves the use of labs and equipment - but this is normally waived in the case of face to face interviews provided one has the informed consent of participants.

The form should be returned to the Vice Chancellor of the university concerned (*I will explain the reason for this in a moment*) accompanied by a letter explaining the nature of the research and the anticipated outcome. The Vice Chancellor's office will then redirect this material to the appropriate person within the institution.

It is important that these papers be sent to the Vice Chancellor in the first instance (irrespective of the return address indicated on the form) as this will enable a file to be commenced in the Vice Chancellor's Office. Even if the Vice Chancellor's Office does little except redirect this material to a more appropriate person – generally the DVC Research or the DVC Teaching and Learning - it is still a courtesy to send requests of this type to the most senior person. Notification of the project will also allow the university to opt out if necessary, although I have never experienced this action myself (indeed quite the contrary – most universities are proactive in wanting the research to be done and will go out of their way to make it effective).

Under normal circumstances the person to whom the request is redirected by the Vice Chancellor's Office will reply within a few days, often by e-mail. The reason for this is that a copy of their response will be expected for the file which, in accord with normal university procedure is generally left open and pending until this is provided. The fact that follow up will commence if no action is taken within a reasonable time tends to ensure a prompt reply from staff. The response will either give approval to make contact with staff or indicate that the university would prefer that the research not take place.

It may also be valuable to discuss with your supervisor (or with some other person to whom your supervisor may direct you) any issues or sensitivities that you should be aware of before making further contact with the university.

It is then best to make an appointment with the person who actually gave you approval to conduct your research on campus to discuss who he or she would prefer you to interview. [Remember that the time taken for interviews costs money and this will need to be borne by the university. While one's informants are unlikely to begrudge the time they spend answering your questions their managers and supervisors may be less generous, particularly if it is a busy time of the year.] The person giving approval is also better placed to suggest informants and having given you a list of people to consider is by implication suggesting that they should make themselves available to see you.

A word of caution, however. Never go to such an interview unprepared. The person you are seeing is likely to be a senior academic who would have almost certainly supervised doctoral candidates during their career and have a strong professional interest in what you are doing. It should hardly be surprising that once they have you sitting in their office they will ask numerous questions about the technical aspects of your PhD (your research question, literature review, methodology, data analysis, findings so far, and so on, to ensure that you are genuine) and you must be in a position to give clear concise answers. If you can't do this, they are likely to regard you as ill prepared and offer little support.

These answers can't be improvised, nor can they take up a great deal of time, and for this reason it is important to have a response prepared in advance to all possible questions.

Once armed with a list of suggested informants one should then write an individual letter to each person requesting an interview but send it as an attachment to an e-mail rather than through the post. [A letter sent as an attachment to an e-mail avoids these difficulties, and it also means that your request can be replied to quickly, and the letter retrieved prior to the interview from the recipient's in-box. Indeed, and I would stress this rule – never send an initial request by e-mail to a Vice Chancellor (where it is likely to be considered disrespectful) and never send a physical letter to an academic, where it is almost certain to be mislaid or forgotten.]

If one is sending a letter to a university administrator as distinct from an academic, perhaps to a Registrar, Planner or Manager, it is always best to send a copy (with a covering letter) to their immediate superior (which can normally be ascertained from the university's website). Unlike academics, university administrators may have to get permission from their team leader or director before they can see you. They are seeking release from their normal duties for this purpose. A letter in advance smooths this process.

There is one other factor to be considered in writing letters to administrators. Much of the work that is done behind the scenes in a university is time sensitive and cyclic. Thus, it would be ridiculous to expect an enrolments person – or indeed anyone from Student Administration – to be available to see you during the

enrolment period, or indeed immediately before the census return date in each semester. In the same way, university planning units are heavily engaged in preparing data for Canberra until the eighth week of each semester, while graduation staff are flat out with ceremonies during the inter-semester break. Administrative informants are generally more than willing to see you, but the time may not be available. As all universities follow a similar (and tightly regulated) time cycle it may be best to discuss with their counterparts in your own university the most appropriate time to request interviews with administrators.

Williams (2012) suggests one additional task that should be completed before making contact with the powerful. Put simply this involves learning as much as possible about the informant before making a request to see them. In the case of the famous it is probable that they may have given many previous interviews. One needs to read these closely, note what they have said (and better – what they have chosen not to say) and then determine their motives and interests. In the case of academics – a group Williams does not mention - it involves making oneself aware of the position they hold, their current responsibilities, their history, and most importantly the contribution of their research to the discipline or the institution, all of which are readily available from university websites.

At the same time Williams notes that this knowledge is useless in itself unless it can be used to gain access to the person sought, remembering in the case of academics and administrators there may be considerable pressure on their availability through conflicting priorities.

Williams suggests that access is best achieved by arousing the curiosity and/or the emotions of the informant's letter openers. In the case of academics and university administrators, the "letter-opener" may well be the respondent themselves, but it is important to remember that these people may be faced with a flood of messages every time they go to their phone or check their computer. It is for this reason, quite apart from the broader issues of courtesy and formality, that requests for interview should never be made under a generic heading – there is far too much risk that messages from unknown correspondents (which might be mistaken for junk mail), will simply be deleted. Thus, it would be a mistake to head your message "Can I make an appointment to see you?" It would be much better to include as much detail as possible in the title so that the recipient can see who you are and what you want. (For example - A much better heading would be "Joe Blow, PhD candidate at xxx, Could I make an appointment to see you in regard to my research?" or words to that effect). Make each message individual (see the next paragraph) and tailored specifically to your respondent.

Your message should be written with two objectives. It should flatter the respondent - in other words the person who receives it should end up thinking "I'm honoured that of all those who could have been consulted the researcher has chosen me". Few academics or administrators receive the recognition they believe they justly deserve, particularly from their own institution, and often the more senior the person the more they are likely to feel that they are now past their prime and are being taken for granted. If the researcher, as an outsider, can provide some counter to this they are likely to be far better received.

At the same time, the letter also should make it clear that it may be in the recipient's best interest to see you. As Williams notes (p 54) the rich and famous (and by extension academics, even though Williams makes no mention of them) have little to gain from interviews. They have achieved success in life, any additional publicity they might receive is nominal, they risk their reputation every time they open their mouth, and their time is limited. It is far better from their perspective to decline a request from an unknown source than to accept it – unless, of course, there is something that is likely to benefit them personally. This benefit can rarely be material (after all, what can one offer to the person who already has everything?) and for this reason must be intangible, appealing either to their conscience, their emotions or their curiosity, and as the first two are likely to be double edged - you may arouse anger rather than empathy by appealing to their conscience or emotions - the last is far safer.

The rich, famous and powerful are as curious as anyone else, and their letter openers are more likely to pass things to their superiors when requests are likely to appeal to the inquisitiveness of informants. Sahu (2003) in his advice to salesmen suggests five strategies for arousing curiosity and thus gaining an interview.

- The first is to explain clearly who you are and who you represent. Busy people can rarely spare time to see strangers, and it is important to establish through one's credentials that it may be worth their while to make an exception and to grant you an interview.
- The second is to be completely up front with the sacrifice that will need to be made if they choose to see you. Acknowledge the things that may need to be foregone but suggest that your visit will more than compensate for any loss this incurs.
- The third is to indicate the period of time that you require but leave the choice of the time of day completely in their hands. To discourage tardiness, however, indicate that you will not be available beyond a certain date or after a certain hour, and that if they don't see you before this they will miss out.
- The fourth is not to reveal everything you are likely to discuss, but simply indicate the boundaries you will not exceed, leaving as much as possible to the respondent's imagination and hence arousing their curiosity. (In other words – what is he going to show me if I see him?)
- The fifth is to always approach your client as though seeking their advice. You are not coming to sell them a product, you are coming to seek their expert advice on its suitability. If they buy what you show them so much the better, but that's not the purpose of your visit. (In both an academic and business context this also adds to the element of flattery).

Before sending your request, check that the person in question is actually in Australia and is likely to be available when you need them. Check their availability through their university's website. If you send an e-mail to an absent person it may sit in their in-box until they return, and by then it may be too late. This is particularly the case with staff who have their routine e-mails checked regularly by someone else – and hence you will not receive an automatic notification that they are away - but the person checking this material may put all unusual requests to one side until they return.

If you receive no reply to your message after a reasonable period (say a fortnight) there is nothing wrong in sending a follow up request, but to avoid embarrassment suggest in it that you may have overlooked (or accidentally deleted) their reply, never that they might not have sent one in the first place.

If you are asked to suggest a suitable day for the interview think carefully about the flow of work in a university's week. I have found as a general rule that the best time to see an administrative person is Monday afternoon, and this applies irrespective of whether they are at HEW Level 3 or HEW Level 10. The morning's team meeting is over, and there is the rest of the week to complete the tasks that have been agreed upon. Common sense must apply, however, and as indicated previously there are certain times of the year at which people will be unable to see you – they simply won't have the time.

It is often best to avoid seeing people on Wednesdays. This is the day most frequently used for in-house training, and it is often the day with the greatest number of classes. The one exception to this involves very senior staff (DVC's, etc) who sometimes have fewer commitments on Wednesday mornings as other staff are not available, although because of that, this it is often the time when they are not on campus.

In some cases, it may be suggested that your interview be held off campus. I would advise against this for a number of reasons. If you meet your informant elsewhere it may mean that he or she will not have documents (or the means to copy documents) to share with you. It may also involve considerable disruption through noise and lack of privacy (Try conducting such an interview in a crowded coffee shop or a hotel bar for example!) The other problem is the cost as one can hardly expect informants to go without refreshment in a place where food and drink are so readily available, nor can one expect them to pay for these things from their own pocket.

In some cases, it was more convenient for staff from other universities to come to UTS for interview. This carries its own hidden problems as not only is it necessary to book a meeting room, but it is also obligatory to observe UTS protocol. It is extremely discourteous to bring a senior person from another university onto UTS

property without at least advising the most senior person in the area where the interview will be held that the visitor is coming. As mentioned earlier, it is much easier to see university staff in their own office on campus than to interview them elsewhere.

There are several things to be done if one is interviewing staff on their home campus. The first is to make certain that you can get to the campus, either by car or by public transport, and if travelling by car that you are familiar with local parking arrangements.

It is equally important that one can find the room where the interview is being held. Many staff have offices in obscure locations, and these can be difficult to find if you are unfamiliar with the grounds. *[In addition to that, respondents expect you to be punctual and being unable to find the room is rarely accepted as an excuse].* where there is no self contained campus, and where the staff may be found in scattered buildings that are several streets apart. In the case of rural universities, remoteness may be a problem and senior staff may not be located on campus at all. In this case one may need to search for their office in the commercial part of the adjacent city.

I have little to say about the conduct of the interview, other than to note once again that academics will rarely tolerate the ill prepared, and one must be fully organized with a knowledge of the institution, its staff and its policies. It is also important to remember that senior staff are likely tell you no more than they want you to know, or worse, may seek to run the interview as though they were interviewing you. If an academic changes the subject, or shows a marked reluctance to answer a particular question it is best not to press the issue. *[It is quite legitimate to record a reluctance to answer particular questions in your field notes, however, even though you may be unable to use this "argument from silence" in your thesis]*

I have found from experience that there are a number of patterns that academics follow to avoid questions they would prefer not to answer. [Put bluntly, academics (as sources of authority) seem to find it extraordinarily difficult to say "I don't know" when a question is asked that they might otherwise be expected to answer. To maintain rapport with informants, the researcher, of course, should do everything possible to avoid asking such questions in the first place.]

One of the first ways for academics to avoid an issue (and thereby change the subject) is to ask the researcher something about themselves, or alternatively something about their work, as a response to a difficult or embarrassing question.

The second is for the respondent to pretend that the question has been misunderstood and to seek further clarification. This sometimes confuses the researcher as he or she struggles to provide a clearer explanation, until in desperation they ask about something completely different.

The third is for the respondent to frame their response as the answer to a question they were not asked.

The vast majority of these issues can be avoided by being aware of potential sensitivities and framing one's question to avoid them.

More serious difficulties may arise after the interview, particularly if there is a suggestion that one should adjourn to a near-by staff club for further discussion. The first is that one of the topics discussed will almost certainly be an extension of points raised in the interview. The difficulty here is that nothing that is said can be recorded, nor (as it occurs outside the formal interview process) could it be used in one's thesis even if written down.

The second difficulty is purely practical and rests on the fact that once an invitation is accepted it can be very hard to get away from these unstructured gatherings. If you have an hour for a formal interview in someone's office the expiration of that time gives you every excuse to depart. I normally avoid both of these problems by explaining at the start of each interview that I have an appointment elsewhere later on the same day and hopefully the invitation will not be offered.

I have found a number of problems with the recording of interviews. While these are not unique to interviews in universities, it would seem that the environment within which academics allow themselves to be interviewed exasperates the situation. The first is the rustling of papers while an academic speaks. Academics seem to find it hard to keep their hands still, particularly when seated at a crowded desk and quite unconsciously fiddle with the papers before them. This makes an unnecessary noise that may drown out the person's response. For this reason, I make it a rule when recording never to place the recorder on the informant's desk. It is much better to place the recorder in a shirt top pocket where the microphone is exposed but where unnecessary noise can be avoided.

The second is that academics tend to vary the volume of their voice inconsistently. They may start off loud and end up quiet (or vice versa) particularly when they concentrate on what they are saying rather than how they are saying it. While the human ear can accommodate this quite comfortably it can impose a severe strain on electronic recording devices – as does placing a modern micro-recorder close to a working computer.

There are two other factors to be considered when conducting research into universities. The first is the complete difference in terminology from one institution to another, where the same words may be used but with a completely different meaning (such as the words "program", "course", or "unit"). To avoid confusion, one must be fully aware of the local "language" before going onto campus, particularly if visiting several universities (or even worse, using the wrong term when questioning informants and causing endless confusion). TEQSA – the Tertiary Education Quality and Standards Agency - and others have tried to impose a greater uniformity of language on the sector but it appears to have become a hopeless task.

The other factor concerns titles and levels in academic organizational structures. There have been a number of cases in which I have faced embarrassment by referring to people by an incorrect title (either a title subordinate to their current position, or a title applicable to a position they have yet to gain). I have found it best to consult the institution's staff directory immediately prior to each visit to ensure that I know the correct and current title of informants.

One must be extremely careful to avoid spreading gossip when one visits a university. This includes details of people as well as comparisons between institutions. I have found that the best way to avoid this is to leave as soon as possible after each interview. The informal conversation that leads to gossip normally starts after the interview has finished, particularly if one has managed to establish a sound rapport with one's informant. Williams also warns about this, suggesting that the quicker one departs from a successful interview the better. Indeed Davies (2011) suggests that deadlines may well be the journalist's best friend – they may be hard to adhere to and a frustrating cause of complaint, but they give every excuse for getting away quickly after an interview.

I find it best to give myself an "Absorption Test" after leaving each interview. An Absorption Test is conducted by the researcher on themselves before they look at the notes or other records of a meeting and simply involves jotting down exactly what one remembers from the interview. [In other words, what one has "absorbed" from the experience] This information can be valuable, as it may reveal hidden bias on the part of the researcher. [The researcher will always remember the points of greatest interest or importance to themselves, and unless managed carefully this could subconsciously influence their collection and analysis of data. One can guard against this by comparing the result of the absorption test – which must always be written down – against the interview transcript, thus becoming aware of one's areas of interest, and hence a potential source of a bias of which the researcher is completely unaware]. Adequate time must always be allocated for this. A person who goes straight from one interview to the next cannot perform an absorption test on any interview beyond the last.

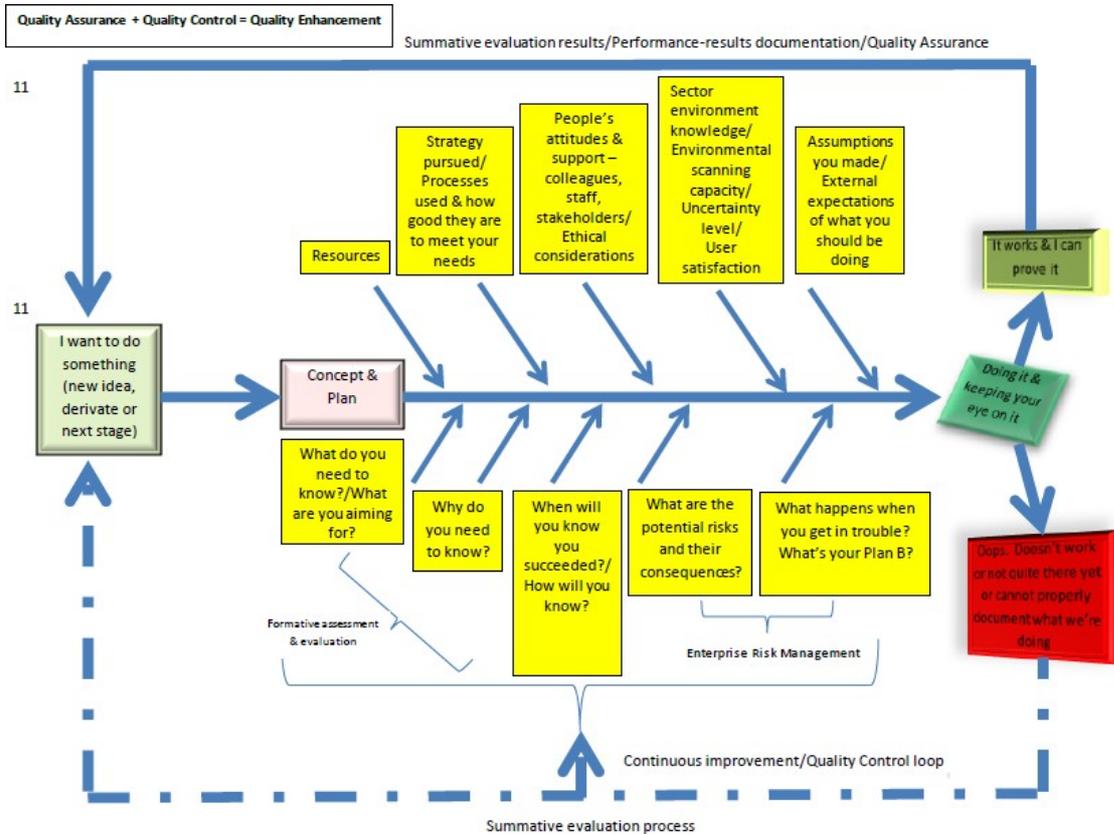
I have also found it valuable to send a brief electronic note after the interview, thanking respondents for their time and promising a copy of the written transcript as early as possible. Academics rarely receive appreciation and notes of this nature can generate enormous good will. (You may also wish to contact the informant again in the future. This becomes far more practical if good will has been established from the first meeting)

There is one other point I would make in regard to visits to other universities. I would stress that above all that on the day of a visit one should never do anything other than collect data from your scheduled informants whilst on campus. There are many useful things that can be done on the premises of another university. However, I would urge that none of these things be done on the day of your visit, lest the purpose of your journey be misunderstood. There are two reasons for this. The first is that your excuse to get away looks very weak if you don't make every pretence of leaving for that appointment immediately. The second is that those who loiter on campus for no apparent purpose tend to attract attention and suspicion, and this can sour your relationship with staff or the institution as a whole (ie; Why is he here? Is this person perhaps more a potential terrorist than a scholar, and if so, how many of our secrets should we reveal to him?) After every interview it is always best that you be seen to leave the campus as quickly as possible. You can always come back on another day if there are tasks left unfulfilled.

## **CONCLUSION**

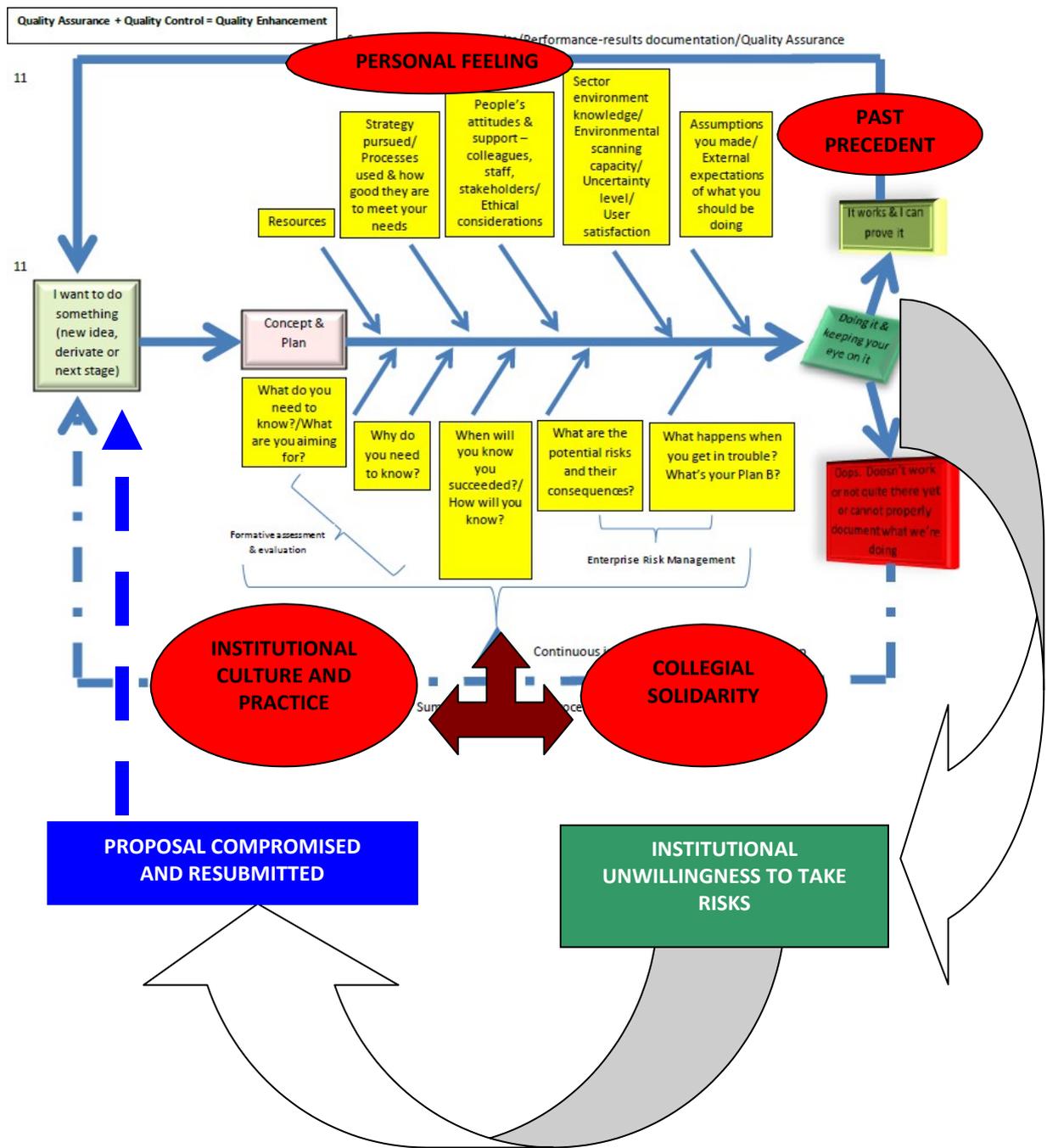
I have found my investigation of the inner workings of universities a rewarding (as well as a sometimes frustrating) experience. It is hoped that my own experience may serve as a guide to those who follow in my footsteps.

## Appendix K - Pardo's Model of Risk Management in Course Accreditation



**Figure K-1 Pardo's Risk Management Model**

Pardo's model is based on the feedback provided by a confirmation and/or disconfirmation of outcomes. The research being conducted will seek to overlay this with the influence of shared governance, as shown in Figure K-2.



**Figure K-2 Possible Model of the Interface between Pardo’s Risk Management Model and Shared Governance in Higher Education Course Approval**

Note: It is stressed that this is a model for illustration purpose only and is not an anticipated outcome from the research.

## Appendix L - Post-Mortem on the Research Methodology

As mentioned in Appendix I, there were few precedents for the conduct of research into the inner workings of Australian universities. It is not that there is anything necessarily secret or “commercial in confidence” about these procedures, it is simply that much of the work done behind the scenes in academia is technical and familiar, and because of its “taken for granted” nature has attracted little attention from scholars and academics. This lack of precedent required in turn a certain degree of experimentation on the part of the researcher, and inevitably this led to a few mistakes, embarrassments and dead ends before the work could be completed. The document that follows notes a number of problems that arose during the research and explains the way in which these were resolved. It also provides a commentary on the success or otherwise of the methodology.

As mentioned in Chapter 5 and Appendix I, the research was conducted in two parts. The first involved an analysis of the course accreditation and risk management documentation produced by the universities while the second involved the interview of selected staff to fill gaps and resolve uncertainties on the part of the researcher. It was intended from the outset that the foundation around which the research would revolve would be the documentation rather than the comments of staff. There were five reasons for this:

- The documentation was current and readily available, and as this material had (in the vast majority of cases) been recently submitted to TEQSA there was little question of its veracity. While it was possible that some institutions might be claiming one thing while doing another – a point completely refuted by the investigation – it was felt that what had been published by the universities represented at least the “ideal” of what was intended and could be trusted.
- It was realised early in the project that few potential informants would have a complete knowledge of all that was involved. Course accreditation is a complex matter that few are involved with from start to finish. Most are more than familiar in their particular contribution, but less certain of the roles of others, and would be unable to provide detailed information other parts of the process.
- It is foolhardy
- to approach the staff of any university without adequate knowledge or preparation. Staff are busy, most work under tight deadlines, and none are prepared to tolerate the ignorant or timewasters. For this reason, it was considered essential to read widely beforehand, and to know exactly what to ask (and by the same token to know what to avoid). This in turn required a close study of the documentation.
- Universities are delicate creations, with pride and strong sensitivities, and these things cannot be overlooked by those seeking a harmonious relationship with the institution. Again, this requires a close knowledge of what is going on, and an ability to see the world through their eyes and mission statement rather than one’s own. University documentation provides a vital insight into the way in which a university views itself, and this must be taken into account by all who venture onto campus.
- Universities are also places of power and control, with personal and well as institutional agendas, and it is essential to be aware of the politics and relationships of its staff members before one goes near their front door. Much can be learnt from a reading of the documentation produced by the universities by those who know what to look for (such as who authorised particular papers, or who is omitted from the chain of responsibility, and so on) and if this can be done from the safety of one’s workstation, rather than on campus, so much the better.

The first stage was therefore an extensive collection of documentation followed by a close reading and analysis, and this long before any contact was made with the institutions themselves. No difficulty was experienced in gaining this material (most was readily available on university websites) and in comparing and

contrasting procedures and approaches. Eventually a portfolio was prepared for each Australian university, with gaps noted in the material provided in the material provided.

As it would be necessary to interview staff to enable these gaps to be filled, ethics approval requested from the UTS Human Ethics Committee (Approval No 201400019) and the requirements of this body complied with.

A certain amount of uncertainty was occasioned by the novelty of the research and the potential to cause embarrassment to UTS through haste, carelessness or inappropriate behaviour. As far as could be determined this was the first occasion on which a PhD candidate from any Australian university had investigated the inner workings of these institutions at depth and the potential for misunderstanding was high. Worse, the candidate was known to staff elsewhere through his professional work and his association with Higher Education regulators, and it was vital to avoid any suggestion that he might be a UTS spy or a TEQSA agent, using the mask of research to discover the weaknesses of others and thus gain competitive advantage.

UTS was aware of the past history of the researcher (who had been a member of the UTS Course Accreditation Committee for several years previously) and suggested that he develop a voluntary code for the conduct of research into universities (a copy of which is attached as Appendix M).

Once the gaps in documentation had been identified a search was made (using the data previously mentioned on each university) to find suitable informants in each institution, and to approach the universities in the manner explained in Appendix I. It was obvious that time and resources would make too much travel impossible, and for this reason as many interviews as possible were conducted by phone, particularly where regional or interstate universities were involved. This was found to be more than satisfactory as it cut down on unnecessary conversation (no one likes holding a phone to their ear for an extended period even if a loudspeaker is fitted) and avoided the inevitable delay caused through hospitality. The downside of phone interviews was difficulty in recording conversations, either electronically or manually, a task difficult to do when one is on the phone, while the use of recording devices in this context remains legally questionable.

In retrospect, the methodology worked effectively - perhaps too effectively as a great deal of data was collected and this made the writing of the thesis difficult as much of necessity had to be excluded. Most of the information gathered is time sensitive, and as such it seems unlikely that it can be used in future papers without extensive updating and revision.

If doing the task again I think that it would be desirable to focus on a narrower set of universities (perhaps the Group of Eight or the members of the Australian Technology Network) rather than to attempt to cover the field as a whole. A sector wide approach was needed when there was little information on what was occurring across the country and where selectivity might allow exceptions to creep in and be regarded as the norm, but this may not be necessary in the future.

## Appendix M - Protocol to Govern the Conduct of Research into the Internal Working of Other Universities

*This protocol has been developed as a voluntary code of conduct to govern the conduct of research into the course approval and risk management processes of Australian universities. The purpose of this document is to establish an appropriate and transparent framework within which this research can be undertaken without causing misunderstanding by respondents or by their institution.*

### Rules for Protocol

1. Nothing whatsoever should be done behind the back of a university whose practices have been selected for research. This means that once the institution has been identified for this purpose it should be informed of the scope and nature of the proposed research, advised when the research is likely to take place, and given information on the feedback that would be provided when the task was complete. In addition to this, the institution itself should be asked for guidance on how the research might best be conducted.
2. Initial advice should consist of a letter to the Vice Chancellor, with a copy of the letter to the research office of the university concerned, and a further copy to the PVC/DVCA, the Chair of Academic Board, and to the Registrar (or equivalent staff as appropriate). The university should be given the opportunity to opt out of the research if it is considered inappropriate.
3. The letter should indicate that the university will be identified by name in the thesis, but that the relevant research material will be sent for prior consideration (and possible amendment) by the informant on behalf of the institution before it is used.
4. Institutions need to be assured that any material collected during the research will be used for the writing of the thesis only and will not be used for any other purpose.
5. The researcher will assure institutions that no mention will be made of operational inconsistency, questionable practice or staff failings. In the unlikely event that any of these are uncovered they will be passed over in silence and be neither reported nor commented upon.
6. The letter will ask the university to nominate a suitable individual to act as contact person through whom all relationships with other staff are to be maintained.
7. The researcher will enter into an agreement with his day-time employer (*this researcher was employed by the NSW Directorate of Higher Education the time this document was prepared*) to ensure that no conflict of interest can arise from the research, and the fact that such an agreement has been made will be declared in advance to respondents.
8. The researcher will ensure that his supervisor is kept fully informed of any problems that might arise in dealings with other institutions, and the supervisor (if felt appropriate) will in turn advise his university's management.
9. Interviews that take place will be "on the record" only. There will be no "off the record" interviews in relation to this research.
10. The researcher will only release information about the conduct and/or outcome of the research through the supervisor, and this restriction will be made known to respondents.
11. Any data collected as a result of this research but not included in the thesis will be retained for the statutory period but will not be used for any other purpose. Unused data will then be destroyed.

12. To indicate the separate nature of this operation (and to distinguish it from all other work undertaken by the researcher) no other higher education business will be transacted during, or in association with, the interviews for this research.

**Additional rules for research into the workings of a researcher's own university, in this case, UTS**

*The question of research into UTS by a student enrolled in that institution presents greater difficulty. On the one hand a postgraduate student is in a slightly different position from a member of staff (one assumes that the normal confidentiality clauses of the staff disciplinary procedures - which are essentially governed the master and servant relationship of an industrial agreement - would not apply in the case of a student) although there may still be dangers – either potential or actual – for those who hazard such an enterprise.*

*At the same time, it is believed that it would be inappropriate to declare UTS “off-limits” to bona fide research simply because one was enrolled in the institution, unless there was genuine concern about what might be discovered, or about the consequences for one's future. Indeed, to deliberately omit UTS while conducting research into other institutions may strongly suggest the existence of these possibilities.*

*UTS needed to be treated no less fairly or differently than all other university throughout the research process, and for the student to be confident that the research – provided it is undertaken legitimately and honestly – will presents no threat to his current or future standing with the Institution.*

*For this reason, all twelve of the points listed above would continue to apply if I, as a UTS postgraduate, sought to examine the inner workings of my own institution, with the following additions:*

13. Where it is felt desirable that research be conducted into the internal operations of UTS by a UTS student it should first be necessary to convince the supervisor that research into one's home university is unavoidable, either because of some factor specific to UTS, or because of the need for access to privileged information (or access to certain members of staff, etc) that other institutions may be unwilling to provide. Above all, UTS must not be examined as a university simply because it is the most “convenient” or because it is perceived as a more “user-friendly” object for research. If an equivalent result can be achieved through the study of an alternative university, it should be the alternative university that is examined, not UTS.

14. If research into UTS is unavoidable, the supervisor (acting where appropriate on the advice of the Responsible Academic Officer or other staff) will advise the candidate of the officers within the University who are to be advised in advance of the proposed research, and the information that should be provided to these persons. It will be the responsibility of the candidate (not the supervisor) to notify these individuals by formal letter (not simply by e-mail) with a copy of all correspondence to the supervisor. The persons addressed are asked to reply (if they feel that a response is appropriate) direct to the student, with a copy of the reply to the supervisor, rather than solely to the supervisor, or to the supervisor in the first instance. Where it is felt inappropriate for the research to proceed (possibly for reasons beyond the knowledge of the student) the persons addressed will explain this in the reply, albeit without necessarily providing full details, and may suggest alternatives.

15. Unless otherwise approved, research will be confined to documents, etc, that are (or can be made available) within the public domain, or to staff interviews where the staff concerned have been fully informed about the nature, purpose and scope of the research. Standard Human Ethics Committee approval would be required for interviews, and the normal protocol for “expert interviews” would be followed.

16. The candidate would operate under the assumption that any agreement that may be given for research into the internal workings of his own university should be seen as provisional only. It may be withdrawn at any time should circumstances change, or if UTS policy or strategic direction madethis

desirable. Where approval is withdrawn an alternative approach may be negotiated, or the student may agree to postpone that particular aspect of his research until the issue in question has been resolved.

17. While the normal candidate/supervisor relationship would continue throughout the period of research (with the supervisor being the equivalent of the “university contact” who would have been appointed had the research been conducted into another university) the candidate may be required to submit interim reports, etc, to other persons within the university who have a legitimate interest or need for this information. To ensure that there is no breach of privacy, conflict of interest, etc, such reports are to be prepared by the candidate at the request of the supervisor only, and are to be submitted to the person seeking them solely through the supervisor, who may choose to direct that certain material be deleted, or that other changes be made before the document is dispatched.

18. A specific protocol will be agreed between the supervisor and the candidate (guided where necessary by the Responsible Academic Officer) on the procedure to be followed should controversial or embarrassing information be uncovered. While this protocol cannot over ride any legal reporting obligation (i.e., the action to be followed should the researcher discover that a senior officer has embezzled the University, that faculty members are operating an off-shore degree mill, etc) the agreed protocol of advising the supervisor in the first instance is to be followed, before any other action is taken.

19. Apart from the thesis itself, the candidate will agree not to release any information gained as a result of the research, either during the collection of material or afterwards, without the approval of the University (gained in the first instance through the supervisor or faculty). There would be an agreement drawn up explaining the manner in which information can be released after the examination of the thesis if necessary.

20. The University will be asked to indemnify the candidate – provided all appropriate protocols are followed – against any discriminatory action that may prejudice his or her candidature or eligibility to graduate or to seek future employment, should the findings of the research reflect unfavourably on the institution. The candidate, in return, will ensure that all controversial findings can be verified by independent assessors using objective evidence, and that the results arising from the research are interpreted and presented in a disciplined and impartial manner.

21. To avoid any perception of conflict of interest, it is advisable that the candidate not hold any office within the university that could bear some relationship to the research, either immediately before or while the research is in progress. This includes membership of a relevant board or committee, or the holding of a tenured or elected office in an affiliated body that may give access to information that is not available to the general public. Should this prove impractical, the candidate will enter into an arrangement with the supervisor to ensure that any “privileged” information that may come into his possession can be quarantined from the thesis.

22. To avoid misunderstanding or uncertainty about the nature of the research, the candidate (under the guidance of the supervisor and/or the faculty) will seek to have an article included in “U” (the university newspaper) explaining both the aim and the duration of the research before data collection commences. As far as possible a photograph of the student will accompany the article so that people know who the researcher is and can avoid imposture, and the article should also include the promise of follow up at a later date that will summarize the outcome of the research.

23. To ensure impartiality, there should be no suggestion of the university paying the student either in cash or in kind for any component of the research or providing resources over and above what is normally available to all other postgraduate students. The University, in turn, should be asked to agree not use the outcome of the research for advertising or promotion, for aggrandizement, or for any non-academic purpose.

24. The normal intellectual property arrangements should apply to any research conducted into the University. The fact that it is the University itself that is the subject of the research should not affect intellectual property in any way.

25. The University may request as a condition of the research, that collected data on itself (whether ultimately published or not) be included in the University Archives, the Library, or in some other location where it may eventually be available to others, subject to the normal restrictions on time and confidentiality. The candidate or the University itself may impose other restrictions on the availability of this material depending on the circumstances

## Appendix N - Course Accreditation at the University of Canberra & ANU

This paper gives a comparison of governance and course accreditation procedures at the University of Canberra and at the Australian National University, both of which may provide useful case studies for my thesis. This information was accurate at the time it was collected. There have since been changes.

### The University of Canberra

**The University of Canberra (UC)** is located in University Drive, in Bruce (a suburb of Canberra, ACT) 2617 (phone 6201 5111) and is one of four tertiary institutions in the Australian Capital Territory, *[The others are the Australian National University, the Australian Defence Force Academy (ADFA - an affiliate of the University of NSW) and Charles Sturt University which has now taken responsibility for St Marks Theological College, and teaches no discipline other than Theology in Canberra]*

The University of Canberra was established as one of the institutions formed under the Dawkins reforms to Australian higher education in the late 1980s, having previously operated as Canberra College of Advanced Education, a polytechnic that was founded in 1967. The institution commenced as a university on 1 January 1990 and, for the first three years of its existence (1990-1993), was under the sponsorship and guidance of Monash University (Norton 2014). A number of Monash features that have been retained from that period, both in the governance structure of the University of Canberra and in regard to the course approval procedure.<sup>1</sup>

The University has a little over 13,000 students (by head count rather than EFTSU), of whom around 9,500 are undergraduates. Most teaching is done on campus in Bruce.

The University of Canberra experimented with teaching elsewhere and closed a number of ventures.

The University of Canberra operated for a number of years in Sydney through the Williams Business College at 1 James Place, North Sydney 2060, offering a limited number of Business awards to overseas students (mainly Bachelor of Business Administration). This ceased with the sale of the Williams Business College to a multi-national teaching group that had already established a relationship with other tertiary providers.

In more recent times the University has taught away from Canberra by establishing links with a number of TAFE and private colleges in Sydney and Melbourne and currently offers a limited number of Business and IT programs through the [Metropolitan South Institute of TAFE](#) and the [Holmesglen Institute of TAFE](#) in Victoria and through them, although the number of students has always been very small. Negotiations are proceeding to offer a similar range of courses in Brisbane through TAFE Queensland. (University of Canberra 2013)

At times, the University offered courses through international partners at Hong Kong, Singapore, Shanghai, and Ningbo, and also has a specialist teaching centre for Department of Defence staff at Weston (ACT). The University claims considerable experience in teaching academic programs in Mandarin (mainly Business programs, but also IT) and offers a service in this language where required with local teachers using a University of Canberra curriculum and receiving a University of Canberra award. *[There is a slight variation for the approval of courses in languages other than English, and this will be discussed later in this paper]*

### Governance Structure

The governing body of the university is a fifteen member Council, established under the *University of Canberra Act (ACT) 1989*, with the powers of the Council being established by Section 10 of the Act. Originally the University Council consisted of no less than 40 members, but this proved unwieldy, and the number was

<sup>1</sup> It must be remembered, however, that Monash course approval procedures have changed enormously since the early 1990s, and thus the comparison is between what Monash required from the University of Canberra in its foundation years, not what Monash necessarily requires of its own courses today.

reduced in 2005 to the present figure of 15. Of these, nine members are external to the University, with eight of these external members being appointed by the Chief Minister of the ACT on the advice of the ACT Legislative Assembly, and the other by the Commonwealth. The seven internal members include the Vice Chancellor, the Chair of Academic Board (both ex officio) and others elected by the University's internal stakeholders, including undergraduate and postgraduate students, the academic staff and the general staff. The Council of the University of Canberra plays a more active role in the day to day management of the university than is traditional elsewhere<sup>2</sup> and this in turn impacts on many aspects of its operations including the University's course approval procedures.

More could be made of this although I have no wish to do so here other than to explain that in the majority of the "stand alone" Dawkins' universities (where the former Colleges of Advanced Education were not absorbed into one of the older institutions) were structured around a model in which the governing body rather than the vice chancellor was intended to be the supreme authority for daily business similar to the now superseded College Councils<sup>3</sup>, with the Vice Chancellor acting simply as "executive officer" (essentially as a continuation of the "College Principal") to the governing council. The structure proved ineffective as the governing bodies met too infrequently to act as bona fide Boards of Directors, and was disregarded by the newly independent vice chancellors, many of whom avoided the governing body by establishing their own system of advisory committees that were independent of those established officially by the university. While these "kitchen cabinets"<sup>4</sup> had little power in themselves (and if challenged were purely advisory), their great advantage lay in the fact that they met frequently, in certain cases every morning, and could be used by vice chancellors to shape the actions and responsibilities of individuals through granting favour, restricting opportunities or exercising control over promotion, budgets and events.

A further reason for their success lay in the fact that these bodies fell outside of the official organizational structure, and as a result, and to the frustration of contemporary researchers, they are essentially unaccountable. Their records, advice and decisions did not need to be made public, have never formed part of the university archives, and (even where they still exist) cannot be accessed through Freedom of Information legislation.

I mention these things not to digress into a study of higher education politics and power struggles in the 1990s (informative though this might be) but because it is essential for an understanding of the present course approval policy and procedure at the University of Canberra.

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<sup>2</sup> The role of the governing body in the pre-Dawkins universities (*the institutions that existed before the late 1980s*) is often quite different from the role of the governing body in the Dawkins institutions – and this is in fact recognised in the enabling legislation of many of these bodies. In the majority of the pre-Dawkins universities the governing body (until the passage of new legislation by the Commonwealth in 2005) was viewed more as a regulator – virtually as a Board of Review for the decisions of the bodies beneath to whom power had been delegated – with little involvement in the day to day activities of the institution, much of which was left to the Vice Chancellor and the academic staff. The role of the governing body in the Dawkins universities is quite different and tends to be seen more as a senior management authority – virtually a Board of Directors – with direct involvement in (and responsibility for) day to day operations. This has a significant impact on both the role of the Vice Chancellor, and more incidentally on the course approval process.

<sup>3</sup> There were a number of reasons for this, most of which were based on state politics of the 1980's. State governments were not satisfied with the independence demonstrated by the older universities at the time (who on being funded from Whitlam money could afford to laugh at their former state masters. For this reason the state governments sought to dominate the newly established universities through control over their councils. In this scenario, the Vice Chancellor was regarded as little more than a servant (slave?) of the University Council, with little independence but considerable accountability.

<sup>4</sup> I believe that Simon Marginson was the originator of this term. Much of my argument for the rise of this alternative powerbase comes from Marginson's book MARGINSON, S. and CONSIDINE, M. (2000) – *The enterprise university: Power, governance and reinvention in Australia*. Cambridge University Press, Cambridge & Melbourne,

The key committee in this alternative network at the University of Canberra was the Vice Chancellor's Advisory Committee (VCAC). This committee was required to advise the Vice Chancellor on all issues within the institution, and had the following sub-committees:

- VCAC Academic Programs Committee
- VCAC International Committee
- VCAC Teaching and Learning Committee
- VCAC Marketing Committee
- VCAC Student Enrolment Committee
- VCAC Student Experience Committee
- VCAC University Information Management Systems Committee

Of these, the four groups that were the most important for the course approval process in earlier times were the AVAC Academic Programs Committee, the International Committee, the Teaching and Learning Committee and the Marketing Committee, all of which had an impact on new course development, albeit at a distance from the "official" bodies that reported to Academic Board (such as the University Education Committee) even though certain members might be privy to both. This has left an element of secrecy about certain aspects of the University's operation that has lingered to the present day. *[Unlike the vast majority of universities many of the institution's policies and practices remain protected by passwords (using the "Guard" software system) and are available to staff only. For this reason, I have thus found it challenging but not impossible to examine the institution's course approval procedures.]*

The system of informal Vice Chancellor advisory groups declined with the retirement of Professor Roger Dean and the appointment of his successor, Professor Stephen Parker in March 2007 although their legacy has lingered on, with the formation of two groups of committees – those answerable to Council and those advising the Vice Chancellor.

These committees are important, and indeed the University of Canberra is sometimes referred to cynically as the "University of Committees" or the "University of Canberra's Bureaucracy", and while I make no judgement on this, it is important to note the role that committees – as opposed to individuals – play in the management and operation of the institution.

The most important committee remains the University Council whose role was referred to previously. The following committees report to the University Council:

- University Audit and Risk Management Committee
- University Environment and Works Committee
- University Equal Employment Committee
- University Honorary Degree Committee
- University Investment and Development Committee
- University Legislation Committee
- University Nomination and Appointments Committee
- Academic Board

Of these, the most significant as far as course accreditation is concerned is the Academic Board. It is important to note from the outset that at the University of Canberra, the Academic Board is regarded very much as a committee of the University Council, and is viewed as an instrument of that body. The University's website states specifically:

It is perhaps for this reason that the Academic Board at the University of Canberra appears to have less autonomy than similar bodies elsewhere. Its primary task would seem to be the monitoring of academic activities and reporting infringements or successes to Council. Apart from minor delegations, the

Council then decides what action– if any – may need to be taken.

The committees of Council are assisted by sub-committees, and in the case of Academic Board these are;

- Academic Board Executive Committee
- Honours and Medal Committee
- Recognition of Prior Learning Committee
- University Admissions Committee
- University Education Committee

Council also ensures accountability of all University systems and this includes overseeing and monitoring the University's academic activities through its [Academic Board](#). The role of Academic Board is to advise Council on all matters of academic policy, the formulation of the academic objectives of the University and the actions necessary to sustain and develop such objectives and any other matter relating to education, learning, research or academic work of the University.  
[Downloaded from H:\University of Canberra\UC governance.htm on 4<sup>th</sup> May 2015]

- University Research Committee
- University Research Degree Committee
- University Scholarships and Prizes Committee
- University Services Committee
- University Student Appeals Committee
- Faculty Boards

*Source: University of Canberra 2015*

[The last entry incidentally is most important. At the University of Canberra, the Faculty Boards are regarded as sub-committees of Academic Committee (and hence indirectly of Council) rather than the exclusive possession of the faculty. As will be explained shortly this has further implication for the course approval process.]

While a number of the sub-committees of Academic Board meet infrequently, or when the occasion demands, others meet regularly, such as the University Research Committee, the University Education Committee and the University Services Committee [*I will make further mention of the role of the University Services Committee shortly*]. The most important as far as course approval is concerned is the University Education Committee, which itself has a range of supporting sub-committees.

The major sub-committees of the University Education Committee are the Courses Sub-Committee and the Third Party Providers Sub-Committee, the latter dealing with issues such as articulation and the transfer of students from external providers. [While nominally reporting direct to Academic Board, the Faculty Boards have in recent years also been reporting through the University Education Committee and are now viewed by staff – although not as yet by University legislation - as sub-committees of that body than Academic Board.] The end result is that Faculty Boards, while chaired by the Dean, are very much under the control of Academic Board.

The University's website explains the role of the Courses Sub-Committee as:

“To provide advice to the University's Education Committee on the quality of courses at the university, including their review and reaccreditation, and including the oversight of the Course Quality Framework”.  
[Downloaded from [H:\University of Canberra\UC courses sub-committee.htm](#) on 5<sup>th</sup> May 2015]

It will be seen from this that the role of the Courses Sub-Committee at the University of Canberra is wider than the mere assessment of new proposals (although that is included) and involves the constant monitoring of

programs as well as their review every five years. This differs dramatically from their counterparts elsewhere, where the interest of these equivalent bodies ceases once approval is given

The Courses Sub-Committee works closely with the Teaching and Learning Management Team (*part of the Office of Teaching and Learning at the University of Canberra*) a group responsible for improvement to the quality of teaching, curriculum development and the use of new technology. The Teaching and Learning Management Team in turn works closely with the University of Canberra's Services Committee and acts as an important coordinator between these bodies. Figure O-1 explains the relationships between these bodies.

The University of Canberra's Services Committee has few counterparts elsewhere and the Universities website explains its role and function as:

“To provide general oversight of the quality and delivery of administrative services provided for teaching, learning and research at the University and to advise Academic Board and the Vice Chancellor's Group [*the Vice Chancellor's advisory committee, a remnant of the 'Kitchen Cabinets' mentioned previously*]” on relevant policy and practice”  
[Downloaded from <H:\University of Canberra\UC services.htm> on 5<sup>th</sup> May 2015]

It might be thought that this committee, with its focus on the delivery of administrative services, would be composed of administrative personnel or at least have the majority of its members drawn from the General Staff. This is not the case, and as will be explained shortly, the Services Committee consists essentially of the Deans and acts more as a commentator on the quality of administrative services than a provider. At the same time its role in the course accreditation process after proposals are approved remains critical as this is the group responsible for their entry onto the Student Record System (the University uses a Callista software program), the advertising of programs and the enrolment of students.

The University Services Committee currently consists of:

- Professor Lyndon Anderson (Chair) - Dean, Faculty of Arts & Design
- Professor Francis Shannon – Deputy Vice Chancellor Research
- Mr David Formica – Acting Vice President Operations
- Professor Diane Gibson, Dean, Faculty of Health
- Professor Lawrence Pratchett, Dean, Faculty of Business, Govt & Law
- (Vacant) – Academic Director & CEO of the UC College
- Assist Prof Abu Mollik – Faculty of Business, Government and Law (Member of Academic Board)

While there is provision for the General Managers of the four faculties to attend meetings, it would appear that their function is to provide information only, and they have no voting rights.

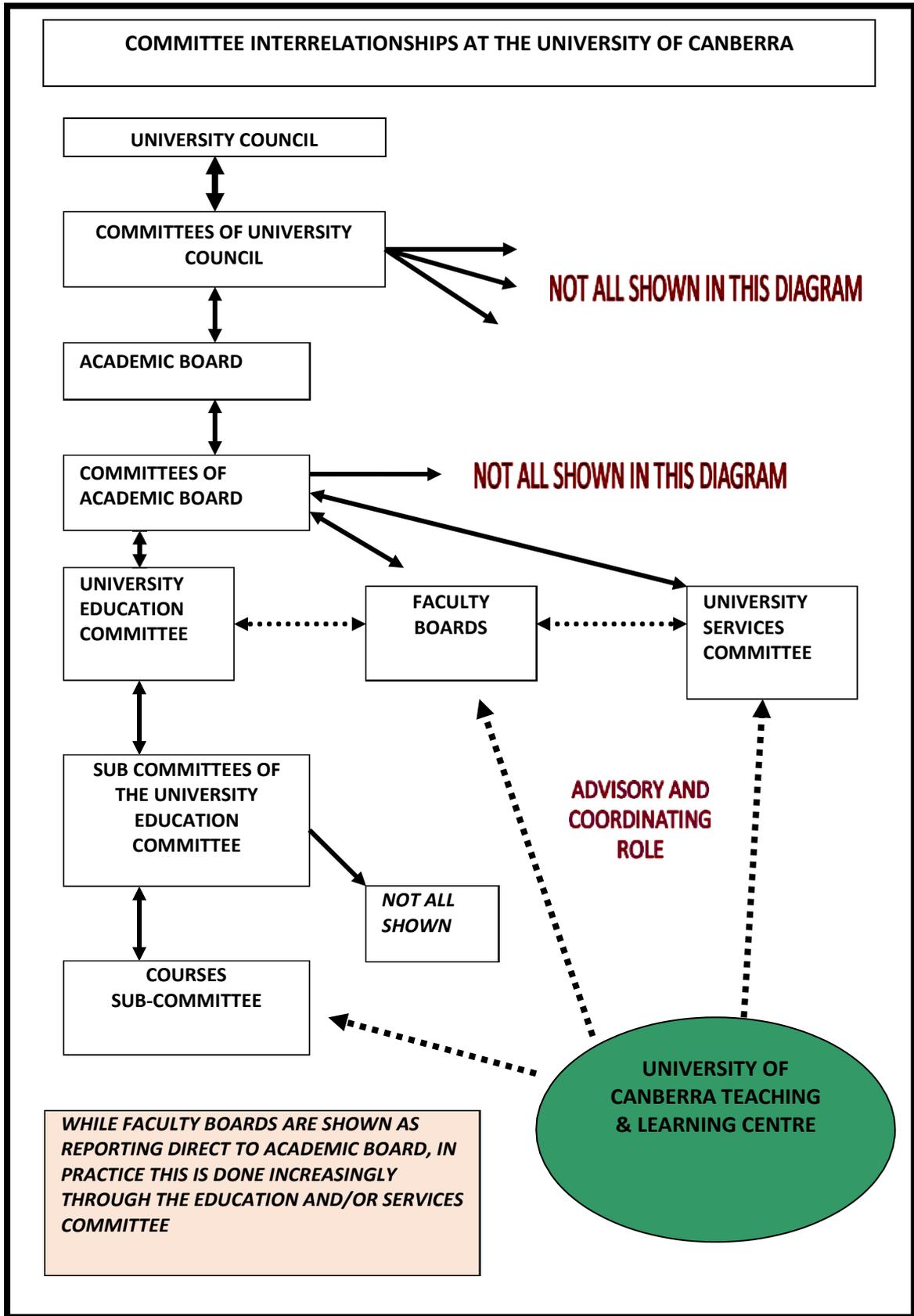


Figure N-1 Committee Interrelationships at the University of Canberra

The role of the University Services Committee (at least as far as course approval is concerned) is to provide for the on-going monitoring of course related statistics, such as student satisfaction surveys, service scorecards, key performance indicators and support unit reviews. The Services Committee is also responsible for ensuring that services are in place for new programs (including rooms and timetabling) and that the best use is made of space and resources. [The role of the Courses Sub-Committee on the other hand is to ensure that the curriculum is sound and that teaching and learning is taking place. Both are expected to work together under the guidance of the Teaching and Learning Centre.]

As can be seen from the membership the UC Services Committee is essentially a committee of Deans and before going further it might be worthwhile examining the structure and role of the Faculties in the University of Canberra.

There are four faculties at the University of Canberra:

- Arts & Design
- Business, Government & Law
- Education, Science, Technology and Mathematics
- Health

Each faculty has a Dean and an Associate Dean (Education), both of whom are at arms length from the Academic Board. Faculties report to Academic Board through the Faculty Board rather than through the Dean. [The words underlined are important. As will be explained shortly, the Deans are appointed by and report personally to the Vice Chancellor. This provides a potential source of tension].

The University's website states:

Faculty Boards play a vital role in the development of a coherent philosophy of education within the Faculty and facilitate its translation into academic programs which reflect the broadest base of consultation and the principles and policies established by Council and Academic Board governing the University as a whole...  
[Downloaded from <H:\University of Canberra\UC Faculty-boards.htm> on 5<sup>th</sup> May

It would seem from this that Faculty Boards are perceived by the University more as the implementors of instructions that come down from Academic Board (or - at a further remote - the University Council) rather than as self-initiating bodies. As will be explained shortly this becomes important in course accreditation procedures.

The composition of the faculty boards consists of:

- The Dean of the Faculty (ex officio) [*Nominal Chair, although this role can be delegated*]
- Associate Dean (Education) (ex officio)
- Associate Dean (Research) (ex officio)
- All "Heads of Disciplines" within the faculty (ex officio)
- All course conveners (ex officio)
- At least two additional members of academic staff assigned to the faculty
- One member of the technical or administrative staff assigned to the faculty

- One undergraduate student representative (nominated by the Students' Association)
- One postgraduate coursework student representative (nominated by the Students' Association)

(<H:\University of Canberra\UC faculty-boards.htm> accessed 5<sup>th</sup> May 2015)

It will be noted that the majority of members are ex officio academic staff and that there is only one technical or administrative person on the board, who in many cases may be the librarian attached to the Faculty. The absence of technical or administrative staff on faculty boards may be a source of weakness and is believed to have a significant impact on course development and approval.

### Course Accreditation at the University of Canberra

The current policy (available to university staff only rather than the world at large) is dated November 2011 although it is understood that a new policy and procedure has been prepared in response to TEQSA requirements for implementation later in 2015. I have had no access to the latter.

Under the November 2011 policy new courses can be approved only if they fall within the scope of the University's *Strategic Plan*, although this is a rather vague document that lists the fields in which new programs should be offered and the level of award but provides little detail. I have been told that the University regards its *Strategic Plan* more as a guide than a fixed rule, and that its purpose is to ensure a concentration on particular areas as opposed to an uncontrolled expansion of the institution as a whole. Traditionally the University has focused on a small range of disciplines (the majority of which appear to be a carryover from the days of Canberra CAE) that are studied in depth, with stability and little change (other than regular upgrading) at an undergraduate level. Postgraduate fee

document prepared for and approved by the University Council and reflects the views of the governing body. The second is that unless something appears on the *Strategic Plan* it cannot be offered.

At the University of Canberra, course proposals rarely arise *ad novo* from the faculty or from junior staff. Instead the faculty is given a list of developments that the university would like (or requires?) the faculty to work on as part of the *Strategic Plan*. The *Strategic Plan* also lists those programs that it suspects may need deletion to accommodate these additions and the time span over which they should be phased out. If staff members (Deans, etc) believe that something is vital for the welfare of students or the university they can make a case for its inclusion on the Strategic Plan, and may even seek fast tracking for its development, but it must be stressed once again that unless a future proposal appears on the Strategic Plan it cannot be activated. I have also been told that once the *Strategic Plan* has been agreed upon the University Council is reluctant to change it and that a strong case must be made for any amendment. The *Strategic Plan* (a dynamic electronic document) is normally prepared at least a year or more in advance, although I am not in a position to state whether the rigidity this imposes impedes or assists the institution.

The Faculty Dean commences development of the proposals listed in the Strategic Plan by requesting the Associate Dean (Education) to prepare a "Preliminary Course Proposal" for consideration by the "Gateway Group". [*The Gateway Group consists of the (university wide) DVC Education, the Chief Operating Officer and the Director of Marketing & Information. The role of the Gateway Group is to determine the commercial as well as the academic viability of each proposal, similar in many respects to the Courses Planning Committee in UTS. It is important to note that the Gateway Group is one of the Vice Chancellor's Advisory Committees and as such does not report to Academic Board, and this may be a source of tension*]. The document prepared for the Gateway Group is both an academic and business plan and its purpose is to persuade senior management that the university should invest funds in its development in the manner proposed.

The Gateway Group is unable to initiate course development. This development is driven by the *Strategic Plan* and is the responsibility of the faculties as agents for Academic Board and the University Council. The Gateway Group can, however, indicate that the resources required are unrealistic, or that the commercial, political or physical environment for which the proposal is intended no longer exist and request change on the part of the

Faculty The Gateway Group, as one of the Vice Chancellor's advisory committees is not answerable to Academic Board, and can, if it chooses delay proposals indefinitely. If approval is deferred under these circumstances (*the Gateway Group never "rejects" proposals – it simply delays putting them to the vote until it is satisfied*) the concept remains unchanged on the Strategic Plan while the faculty makes further refinement. This may involve a change in the Business Plan, an amendment to the curriculum pathway, or both. While all University of Canberra courses have an external advisory group – explained in detail shortly – the official advisory group is not formed at this stage and plays no part in the Gateway process. The faculty may, however, convene an unofficial "quasi-group" of employers, etc, to provide evidence of demand or commercial viability to justify further development to the Gateway Group. The Preliminary Proposal is not required to pass through the Faculty Board (*it is essentially a private communication between the Dean, the Associate Dean (Education) and one of the Vice Chancellor's advisory committees*) but is normally referred to the Faculty Board as a courtesy for comment or advice. (The content should come as no surprise to the members of the Faculty, incidentally, as they would almost certainly have been consulted by the Associate Dean as part of its preparation).

If the Gateway Group approves the Preliminary Proposal, advice is sent from this body to the Vice Chancellor, with Academic Board being advised of the decision through the Minutes of the Faculty Board. In theory Academic Board should then advise Council of this decision through its own Minutes, where the information is included within the Faculty Report to Academic Board (a standing item on the Academic Board agenda) but as this is trivial it is rarely done.

Once approval has been given by the Gateway Committee the Associate Dean (Education) assembles a working party of senior academics to prepare a Full Course Proposal. The full proposal consists of the Preliminary Proposal as approved by the Gateway Group, together with details of the course, learning outcomes, subject outlines, assessment requirements, and so on. This document is then submitted to the Faculty Board for endorsement. (*At the University of Canberra, the Faculty is responsible for the approval of subjects – as is the case in UTS – but the approval of the combination of these subjects to form a coherent pattern of study is the responsibility of Academic Board. The approval of the award conferred as a result of completing this pattern of study is the responsibility of the University Council*)

If the proposal is endorsed by the Faculty Board, it is sent to the Courses Sub-Committee (as a sub-committee of the University Education Committee) and if supported at that level to the University Education Committee and then to Academic Board. Academic Board, in turn, recommends approval of the award to the University Council. It is important to note that at the University of Canberra it is the University Council that gives final approval to the process not Academic Board. While Academic Board has a range of delegated powers – largely to prevent trivial matters from distracting more senior bodies – its role is essentially one of acting as an advisory committee to the University Council, with the University Council making the ultimate decision rather than Academic Board. [*In reality the University Council rarely if ever rejects the advice of Academic Board, particularly in matters such as courses or curriculum issues, but the principle remains in place – it is the University Council that "approves" the institution's courses, not any of the committees that these proposals may pass through. This is distinct from the majority of Australian universities where far greater powers have been delegated to the Academic Board (or equivalent under another name) with only the outcome reported to the governing body.*]

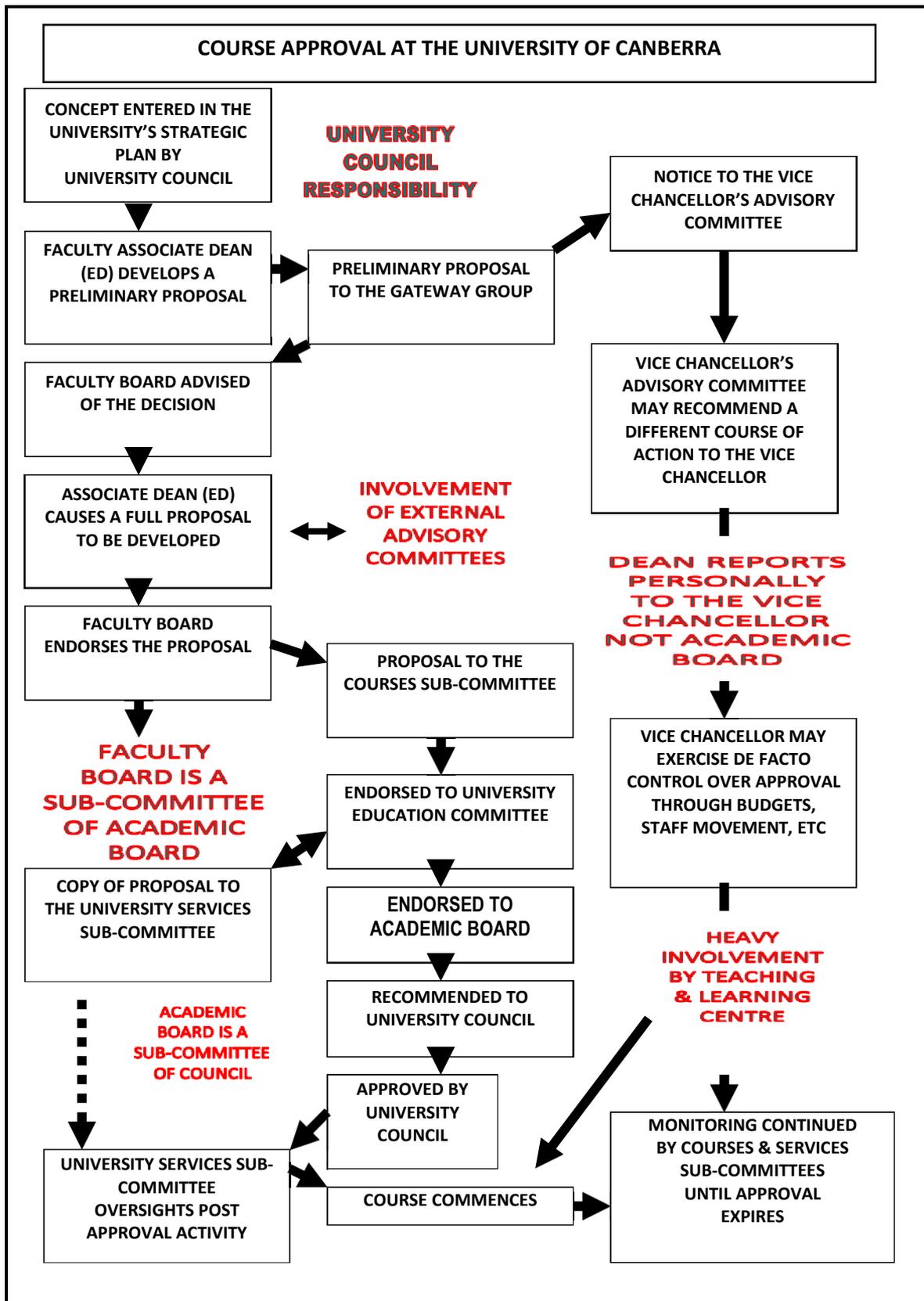


Figure N-2 Course Approval at the University of Canberra

It will be seen from Figure O-2, that there are two forces at play in the course approvals process. On the one hand there is the University Council (of which Academic Board is a committee, with the Education Committee, the Services Committee and the Faculty Boards as further sub-committees of that body) and the Courses Sub-Committee as a sub-committee of the University Education Committee. On the other hand, there are the Vice Chancellor's Advisory Committees, which while unable to initiate proposals can delay their introduction. I have been told that the potential tension between these systems has been much reduced by the present Vice Chancellor, with each group supporting the other. I am uncertain whether there will be any change to these arrangements in the revised course approval procedure.

The discontinuation of courses follows a similar model. While the Faculty can withdraw subjects at any time it cannot close courses as this is a matter for Council. The Faculty can recommend to Academic Board that there should be no further enrolment in a particular program after a certain date and Academic Board can recommend to Council that this be placed on the *Strategic Plan*. The course can be left "in suspension" (in which case it remains on the books but without further enrolment) for a period of two years or alternatively Academic Board can ask the Faculty to prepare a "phase out" proposal for the course which would pass in turn to the Courses Sub-Committee and the Services Sub-Committee for endorsement, and if accepted by these bodies to Academic Board for implementation. (Council would at this stage indicate the "phase out" status of the program on the *Strategic Plan*. I have been told that once a decision has been made to phase out a course it is extremely difficult to have it reinstated as the resources would have been promised elsewhere, and for this reason the majority of the faculties prefer to take a "wait and see" approach by leaving the award in suspension until it is certain that it should be archived.

#### **Staff members to be interviewed**

As previously mentioned, the University of Canberra operates through committees rather than individuals (possibly a deliberate strategy to prevent any office holder from gaining too much power) and this makes the selection of informants difficult. Essentially one can ask them to appear only as representatives of their committee rather than as the actual decision makers.

I feel that the following may be the best to approach for information, although no more than four will be interviewed;

- Professor Nick Klong, the Deputy Vice Chancellor (Education)
- Professor Diana Sharma, the Chair of Academic Board
- Associate Professor Jonathan Powles, the Chair of the Courses Sub-Committee
- Mr Mark Thompson, Deputy Chair of the Courses Sub-Committee and Course Manager, Academic Policy and Review
- Mr Richard Andrew, the University Courses Officer [He is not a member of any of these committees but provides considerable behind the scenes support in moving documents forward, seeing that university policy is satisfied, and so on. He may also be able to advise me on a number of the administrative aspects of course approval at UC.]

#### **Course approval at the Australian National University**

Course approval at the Australian National University (ANU) is similar but far simpler than at University of Canberra (UC) possibly because the complex committee structure of UC can be more easily overridden at the ANU.

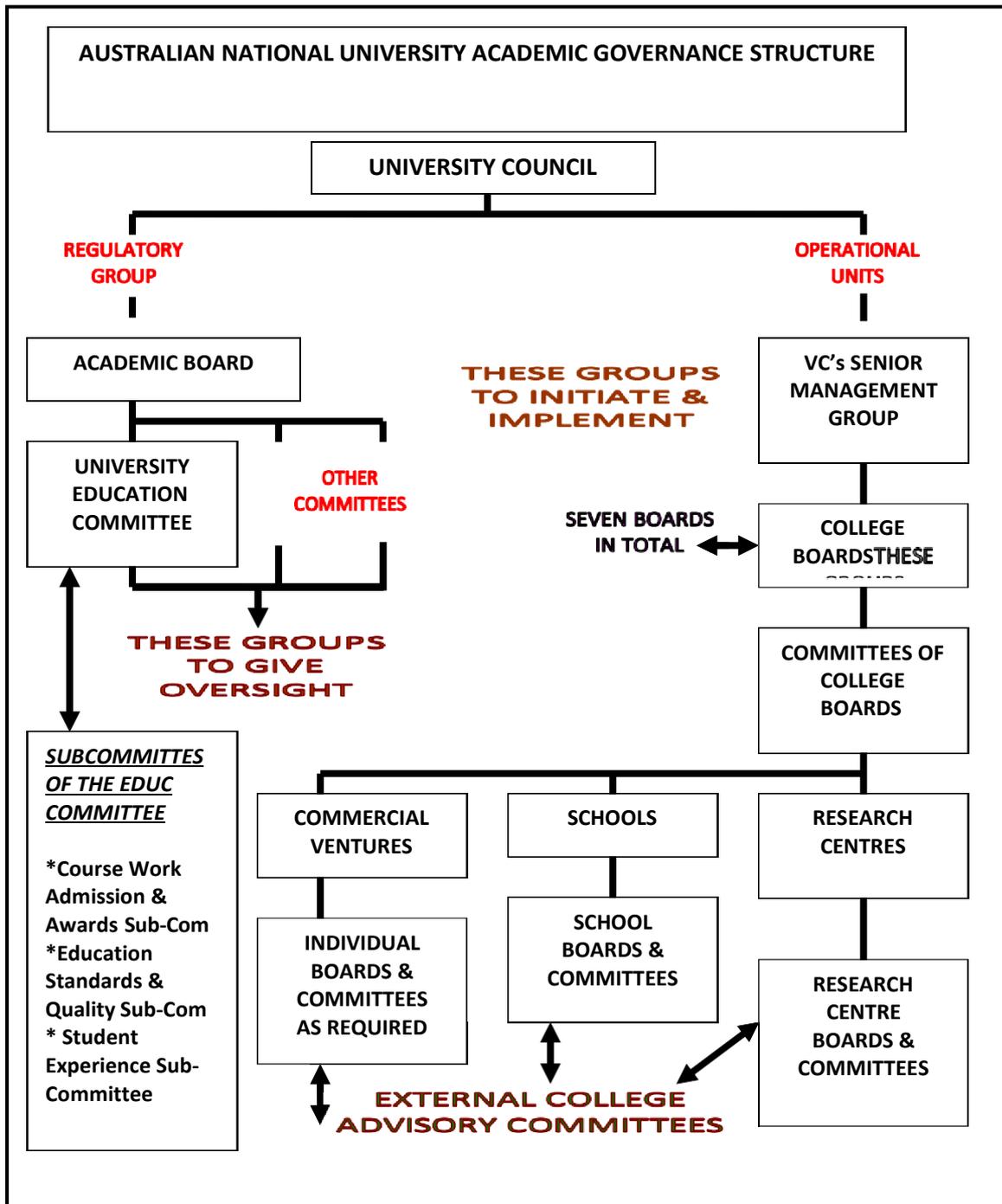
There are no faculties, as such at the ANU, and the equivalent academic divisions are labelled colleges. These Colleges include the ANU research centres and schools (the schools are the discipline groups of the University) and are essentially the skeleton around which the ANU is structured.

There are seven Colleges at the ANU:

- College of Medicine, Biology and Environment

- College of Physical and Mathematical Sciences
- College of Engineering and Computer Science
- College of Business and Economics
- College of Asia and the Pacific
- College of Arts and Social Sciences
- College of Law

It must be stressed that the role of an ANU College is wider than is traditional with faculties elsewhere. Because of this a clear distinction is made between the operational units under the control of the Vice Chancellor's Senior Management Group, which includes the Colleges, and the regulatory group under the control of Academic Board. Thus, the initiative for most activity arises in (and from) the Colleges, while the role of Academic Board and its various committees and sub-committees is to provide guidance and oversight to support these activities.



**Figure N-3 ANU Academic Governance Structure**

It will be seen from Figure O-3, that a deliberate attempt is made to separate the College Boards (which are under the control of the Vice Chancellor's Senior Management Group) from Academic Board and its Committees. The role of Academic Board is to give guidance and to verify compliance, while the role of the Colleges is to develop and implement current and future initiatives.

This is reflected in the course approval procedure of the Australian National University. As in the case of the University of Canberra, course development starts with the institution's Strategic Plan (sometimes called the Academic Plan at ANU to distinguish it from the strategic research and commercial activities of the institution). Unlike the University of Canberra, the *Strategic/Academic Plan* is the work of the Colleges rather than senior

management, with the role of the Senior Management Group being confined to determining the priority of conflicting tasks between the Colleges. [The Academic Plan is much wider than a mere list of courses and lists all that the Colleges hope to do over in future years.]

The majority of course proposals at the ANU come from senior staff in the Colleges. (Junior staff at the ANU appear to be encouraged to concentrate on research and publication as part of their career development rather than on curriculum development. This doesn't mean that junior staff don't teach or have a regular interaction with students – it is simply that they seem to play little role in the development of new courses.) One of the difficulties this produces is that many courses offered by the ANU tend to be traditional in scope and lead more towards to a research higher degree rather immediate employment. This in turn has created a tension between specialists on the staff (research enthusiasts who encourage narrow but highly specialised preliminary programs that will prepare students to follow in their footsteps) and generalists who view the institution's awards as enabling pathways that facilitate entry to research or employment by providing a broader and more general passage through the undergraduate years.

This has led to some interesting compromises, with programs ranging from single strand Associate Degrees, such as the Associate Degree Specialising in Science (the ANU is one of the few Group of Eight universities to offer Associate Degrees), double undergraduate degrees in both flexible double and "vertical double mode, and a whole range of Bachelor programs – Bachelor (Advanced), Bachelor (Honours), Bachelor (Research and Development), Bachelor of Philosophy (an undergraduate analogue of a PhD), and many more.

This tension has an effect on the course approval process. I have been told that the most difficult thing at the ANU is to get a course proposal accepted by the College. Once this can be done, the rest of the process virtually falls into place automatically.

The ANU prepares a list of priorities for the future, the majority of which are listed in the Academic Plan. (Topics for inclusion are provided by the Colleges but the actual priority each might be given is determined by senior management). The Academic Plan is general in nature and lists fields of interest rather than specific courses or awards and I have been told that the document is intended to set boundaries rather than provide specific direction. [This differs from the University of Canberra where the Strategic Plan virtually sets the agenda for new course development and because of the authority invested in it by the UC Council, is both rigid and inflexible. At the ANU the Academic Plan appears intended as a guide rather than a roadmap and lists those fields into which the Colleges might wish to expand or develop rather than tasks to be completed.]

Proposals for the introduction of new academic programs that meet one or more of the University's priorities are first discussed within the School (the discipline groups within the College) and then with the College as a whole. If approved by the College Board, these proposals are submitted to the University's Education Committee for further consideration. [There is no initial course proposal" stage at the ANU, or rather the normal discussion that accompanies an initial course proposal elsewhere tends to be conducted within the respective College as part of the internal discussion. Hence, there is no prescribed format for such documents, nor is there any guidance given as to what the submission to the University's Education Committee should contain. It is assumed, however, that if a College endorses a proposal it will be able and willing to provide the staff and resources to maintain it. Unlike the University of Canberra, the ANU College Boards appear to place greater emphasis on the academic content and benefit than on the proposal's commercial viability.]

Similarly, the ANU Education Committee is also much less interested in the commercial aspects than it is with the content and its potential for research.

If the proposal is endorsed by at least a 75% majority of members, the document is submitted to Academic Board for final confirmation. [At the ANU, it is Academic Board that approves courses, and one of the key roles of the Education Committee is to act as a filter to prevent incomplete or inappropriate requests reaching that body. As proposals are rigorously examined by the Colleges before their submission to the Education Committee, the chance of ill prepared document passing undetected is minimal. The Education Committee is also the first opportunity that other Colleges (and the University as a whole) have to comment on a proposal or to resolve territorial disputes.]

The University Education Committee (whose terms of reference are given later) has a number of sub-committees;

- Coursework Admissions and Awards Sub-Committee
- Education Standards and Quality Sub-Committee
- Student Experience Sub-Committee

The title of each of these sub-committees would appear to be self explanatory. Course documents must pass through all three of these bodies, each of which examines the proposal from its own perspective.

[The ANU Education Committee has the power to appoint ad hoc working parties if the pressure of work becomes too great or if some special task emerges. As at May 2015, the Committee had no ad hoc working parties in session.]

It is customary for the ANU Education Committee to make a formal report on all course proposals that pass through its hands (a time consuming matter that suggests that there may not be a large number of new proposals each year) and this statement accompanies the course proposal document to Academic Board.

Academic Board, for its part, considers this report and determines whether the proposal should be approved. This decision is then conveyed to the University Council. (At the ANU the Academic Board has the delegated authority to approve courses, with the Board simply noting this decision.)

There is a further step if proposals do not meet one or more of the ANU's priorities in the academic plan. (This normally applies to the delivery of work in new or recently split disciplines and because the proposed course may not fit neatly into any of the existing disciplinary groups can give rise to territorial claims.)

To counter this, the ANU has developed a two stage system of approval for programs that fall outside the Academic Plan. In the first instance a College, through the Vice Chancellor's Senior Management Group, will suggest to senior management that a course in a field that has not been offered by the ANU should be developed, normally stressing its need as a preparation for research. [Thus, a deficiency in candidates' skills in a particular area may need to be addressed through the offer of an appropriate enabling course at undergraduate level.]

This can cause territorial claims (which College is best equipped to teach Statistics, Ethics, Experimental Design, and so forth). To avoid this senior management will then ask (through the Chair of Academic Board for expressions of interest from the Colleges in delivering such a program in part or in whole. Essentially the course is put out to tender with the decision being made externally and thus preventing recriminations - remembering that much of the strength (and hence of the power) in the ANU lies in the Colleges.

These expressions of interest are considered by the Education Committee, with the College judged best to take responsibility being asked to prepare a full course submission.

While this process reduces territorial claims, it can become cumbersome and may delay the offer of courses for a considerable period. To avoid this, the Colleges are encouraged to make certain that as many future developments as possible are placed on the Academic Plan. [Unlike the University of Canberra there is no obligation for the Colleges to act on the ANU Academic Plan, which is seen more as a statement of intent than a binding document.]

The ANU University Council is advised of Academic Committee approval but takes no action until a range of administrative procedures are completed. The ANU Academic Committee limits itself to approving the academic content and pedagogy of each proposal rather than its operational viability. A separate process follows to ensure the compliance of the course with current legislation, that it meets demands from the discipline or students, and that the program has commercial viability. This is overseen (at least in theory) by the University's Deputy Vice Chancellor (Academic). In practice, almost all of this is handled by the university's

administrative units. Those providing resources, the Library, IT, Facilities, Student Administration, etc, are asked to comment, and the proposal cannot be offered until each of these groups gives full consent. As soon as all legal or moral obligations are satisfied [Does the award conform to the AQF, ESOS legislation, etc? Does it conform to the ACT legislative requirements, Work Safety, Equity Policies, and so on?] and, after being satisfied that all financial issues have been resolved, the Council registers the new award with the Commonwealth Government.

The model followed by the ANU of checking and approving the academic merit of a proposal and then (and only then) confirming separately that the University can support or maintain it, is one of the features of course approval at many of the non-Dawkins universities, particularly in the Group of Eight. As in the case of a number of the sandstone universities, the ANU gives no guarantee that because a program has been approved by Academic Board or Council it will necessarily be offered to students. Thus, a number of programs that have been formally approved by these institutions have never been offered. [Approval for in limbo programs normally lapses after two years after the date of approval. If a program is not commenced within that time it must seek further accreditation.]

[While this may be the published practice at the ANU, apparently most of these support groups would have been consulted earlier by the College as part of the course development process and that serious problems are rare. Hence, courses are normally mounted normally quickly and efficiently, with a commencement date in the following year. At the same time, the University firmly maintains the principle that academic approval on its own is no guarantee that a program will be offered.]

The ANU accredits its courses for five years from the date of approval and toward the end of this time each program must be reviewed, redocumented and reaccredited. The review is normally undertaken by an external panel under the oversight of the ANU Education Committee, although it is often preceded by an internal course review conducted by the College.

Proposals for the disestablishment of an academic program are made by the College and require endorsement by the ANU Education Committee. The ANU prefers to teach out existing programs on a year by year basis and will normally not transfer students from one program to another, even if they request it. [This practice differs from a number of the post-Dawkins institutions where students lagging behind in terminating programs are normally transferred. The ANU has a policy that students should graduate from the award in which they originally enrolled unless transferred at their own request.]

Considerable responsibility rests with the Division of the Registrar and Student Services for the commencement of courses at the ANU. Not only has the data to be entered onto the Student Record System but much of the advertising is coordinated through this group. The ANU is essentially an administration dominated university (a marked contrast from the University of Canberra which is a Governing Body dominated institution") although much of this seems to pass unnoticed at the ANU, possibly because of the institution's emphasis on research. This gives considerable power to the Administration, particularly at a College level.

Most of the interviews to be conducted at the ANU should involve College rather than the senior executive and that there should be a heavy input from College administrators.

As previously mentioned, the ANU Colleges operate under the oversight of the Senior Management Group rather than Academic Board. Each College has an Executive consisting of the Dean, the Associate Dean (Education), the Associate Dean (Research), the Associate Dean (Students) and an Associate Dean (International). Of these the Associate Dean (Education) would seem to be the most important for my research.

The College administration (budgets, policies, etc) is the responsibility of the College General Manager who in turn answers directly to the Dean. As there is a regular turnover of academics within a College it tends to be the College General Manager who provides advice and stability, and it was felt important to include at least one of these office holders in the list of informants.

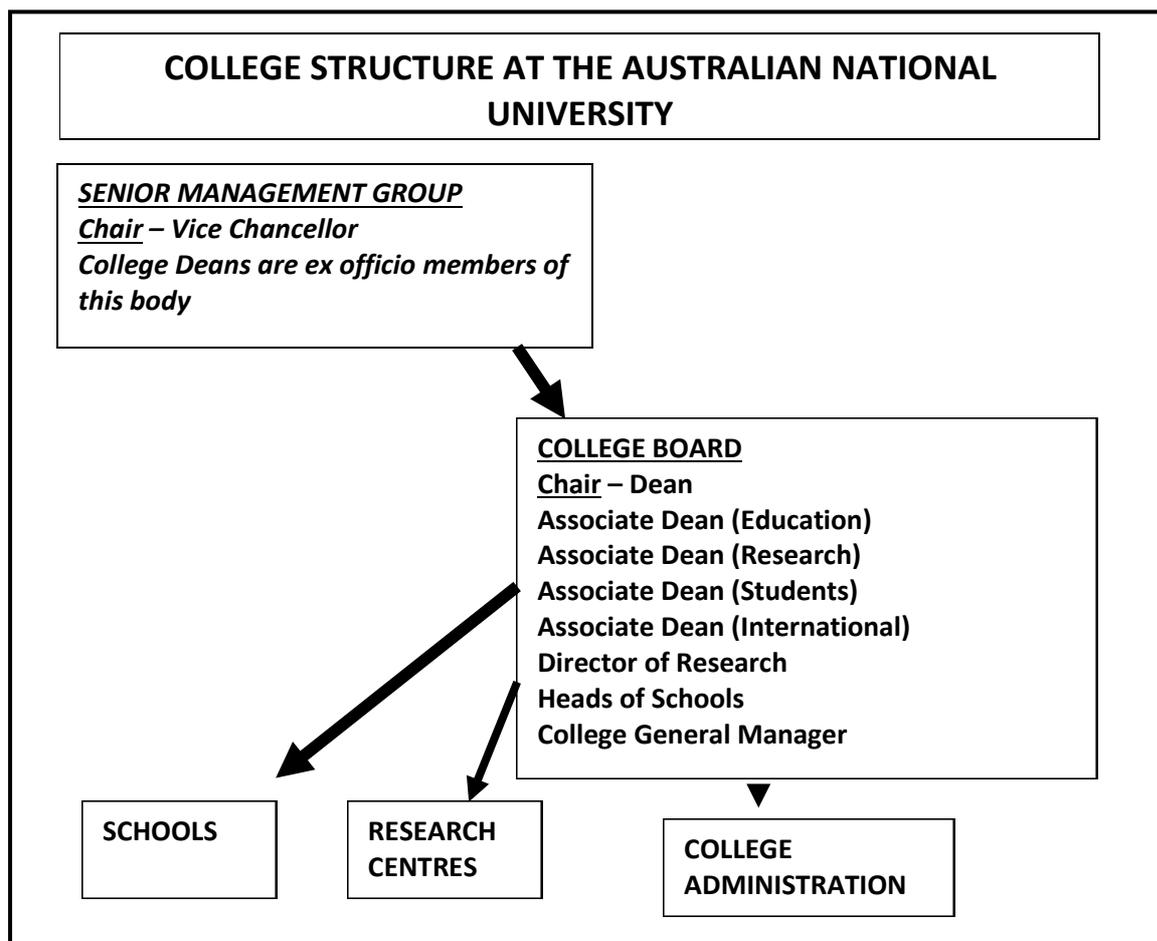


Figure N-4 College Structure at ANU

**Potential Informants**

It was felt to be useful to interview the following informants:

1. Professor Marnie Hughes-Warrington, the Deputy Vice Chancellor (Academic) [*Prof Hughes-Warrington is also the Chair of the ANU Education Committee*]
2. Professor Nicholas Glasgow – Chair of Academic Board A College Dean [- Professor Shirley Leitch, the recently appointed Dean of the College of Business & Economics]
3. A College General Manager [- Ms Pat Boling, the General Manager (Administration) of the College of Business & Economics]

If either of the last two mentioned are unavailable, a Dean from another College and the corresponding General Manager would be suitable.

There is a considerable difference between course accreditation procedures at the University of Canberra and the ANU, although this is not untypical of the sector as a whole. [Indeed, the whole basis of my work involves the fact that all Australian universities would appear to be seeking the same outcome but are going about it in different ways.]