DEVELOPING QUALITY ASSURANCE PROCESSES IN A PRIVATE HIGHER EDUCATION INSTITUTION IN AUSTRALIA

A project submitted to Middlesex University for the degree of
Doctor of Professional Studies by Public Works

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ABSTRACT

This context statement explores my professional practice as a quality assurance practitioner and how I developed my three chosen Public Works which have a common theme of quality assurance. The first Public Work analyses the development process of a new quality assurance (QA) model for Australian Institute of Business (AIB) and how it evolved over three iterations through an Action Research Action Learning (ARAL) process. The second Public Work is an account of how the quality assurance of AIB's transnational education (TNE) offering through third-party delivery changed through the use of the ARAL method; and the third Public Work demonstrates a deeper dive into the application of the QA model in the development of more robust policies.

Limiting the notion of quality in Higher Education to that of quality control and quality assurance is simply a process of identifying problems in provision, fixing them and ensuring they cannot occur again. But this does not consider the question of whether the system is a quality system, or indeed for whom quality is being conceived. I argue that quality control is a single-loop learning approach to the concept of quality, and quality assurance is a double-loop learning approach. If a triple-loop learning approach is applied, then the foundations on which the provision is being controlled and assured are called into question and a new model of quality emerges.

The implications of this triple-loop learning approach suggest that Higher Education providers need to quality assure in multiple ways simultaneously, seeking continuous improvement as they explore the answer to the question of 'quality for whom' for a range of different stakeholders.

The project outcomes achieved through the Public Works are i) the development of a new QA model that continues to be implemented in AIB as an organisational process; ii) the quality mechanisms introduced in the TNE provision but which have now been replaced by online delivery to offshore students; and iii) the implementation of a suite of policies that have been developed in a consultative manner across the organisation rather than in isolation by one part of the organisation.

The process outcome is the development of the quality culture at AIB through having engaged in the ARAL method.

DISCLAIMER

The views expressed in this research project are those of the author and do not necessarily reflect the views of the supervisory team, Middlesex University, or the examiners of this work.

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List of Abbreviations

AIB	Australian Institute of Business
AR	Action Research
ARAL	Action Research Action Learning
AQF	Australian Qualifications Framework
CEO	Chief Executive Officer
DETFE	South Australian Department of Employment, Training and Further Education
ESOS Act	Education Services for Overseas Students Act 2000
GLG	Gibaran Learning Group
Gibaran	Gibaran Management Consultants
HE	Higher Education
HEI	Higher Education Institution
HESF	Higher Education Standards Framework
MOE	Ministry of Education, Singapore
NUHEP	Non-University Higher Education Provider
QA	Quality Assurance
TCs	Teaching Centres
TEQSA	Tertiary Education Quality and Standards Agency
TNE	Transnational Education
WAL	Work-Applied Learning

Chapter 1   Introduction

1.1 Overview

This context statement is a critical examination of my professional practice as a quality assurance practitioner and of the development of the Public Works I have chosen to present.

After spending the first 18 years of my professional life working as a legal practitioner, I embarked on a new career in quality assurance (QA) in higher education (HE) at the Australian Institute of Business (AIB) in 1994. AIB is a non-university higher education provider (NUHEP) based in Adelaide, South Australia and delivers courses in business and management at Bachelor, Master and doctorate levels. It is currently the largest provider of the online Master of Business Administration course in Australia (Department of Education 2019) and the only NUHEP to be accredited to deliver the research courses of Master of Management, Doctor of Business Administration and Doctor of Philosophy (TEQSA National Register). My Public Works have been developed during my second career, but through the reflective process of completing this doctoral programme, the underlying conceptual framework of quality assurance that I practised in AIB had actually had its beginnings in my first career as a legal practitioner. Before presenting this journey, I first want to define some key terms and set the context for the work being presented.

1.2 Quality and Quality assurance – an overview

What is quality? There is a lack of consensus among researchers (Green 1994; Harvey 2014; Srikanthan and Dalrymple 2002, 2004, 2007) on the definition of quality, with some claiming that 'quality can neither be defined nor quantified'and others asserting that quality is subjective and dependent upon individual perspectives' (Schindler et al. 2015:3). The definition of quality given by the International Standards Organisation (ISO 9000:2015) as 'the degree to which a set of inherent characteristics of an object fulfils requirements' is sufficiently broad to apply in any context, including education and hence is a good starting point on which to build.

In their synthesis of the definitions of quality in HE, Schindler et al. (2015) identify four broad classifications of quality: i) purposeful – where institutional products and services conform to a stated mission/vision or a set of specifications, requirements, or standards, including those defined by accrediting and/or regulatory bodies, ii) exceptional- where institutional products and services achieve distinction and exclusivity through the fulfilment of high standards; iii) transformative – where institutional products and services effect positive change in student

learning (affective, cognitive, and psychomotor domains) and personal and professional potential; and iv) accountable -where institutions are accountable to stakeholders for the optimal use of resources and the delivery of accurate educational products and services with zero defects. Arguably all these classifications meet the broad ISO definition above, so some distinctions need to be drawn within the definition of quality with regards to the 'fulfilling requirements' element, be it assurance, control or improvement. My starting point was that all four classifications were part of quality assurance, but as my Public Works will demonstrate, the subtle differences between the four led to a deeper understanding and a new model of quality assurance emerging.

In their review of various definitions of quality assurance, Schindler et al. (2015) find some common structural elements. The first element is a set of processes, policies or actions performed *externally* by quality assurance agencies and accrediting bodies or *internally* within the institution (Commonwealth of Learning 2009; Opre and Opre 2006; Quality Assurance Agency for Higher Education 2012). Many definitions of quality assurance also include aspects pertaining to accountability and/or continuous improvement (Singh 2010; Srikanthan and Dalrymple 2004). Some definitions are *broadly* constructed, for example, 'to ensure the maintenance and enhancing of quality' (Opre and Opre 2006:422), whereas others target *specific* aspects of quality that will be assured, for example, 'to ensure it meets the standards that apply to higher education in general or to the profession or discipline in particular' (Martin and Stella 2007:34).

The definition of quality assurance provided by Harvey (2014) as 'a process of establishing stakeholder confidence that provision (input, process and outcomes) fulfils expectations or measures up to threshold minimum requirements' seems to succinctly capture most of the various structural elements mentioned above.

For the purposes of this Context Statement, my definition of quality assurance incorporates many of the above mentioned elements and i) refers to the set of processes, policies or actions performed *internally* within AIB so that provision (input, process and outcomes) fulfils expectations or measures up to threshold minimum requirements; ii) ensures accountability and continuous improvement; and iii) targets *specific* aspects of quality that will be assured. This internal, specific focus bounds the notion of quality assurance within limits and allowed me to develop a broader approach to quality in general while still attaining a quality assurance outcome. By defining and bounding it so clearly, I could be sure to achieve quality assurance while still experimenting and developing other aspects of quality more fully.

Hence, quality assurance is assuring that a minimum threshold is attained and is bounded in a specific context. This differentiates quality assurance from other notions of quality such as quality improvement, quality control or quality as a philosophy – something I came to understand is very important to me and my practice as a quality assurance manager in education and drove my activity which is presented as my Public Works later.

1.3 My Public Works

Each of my Public Works relates to quality assurance at AIB and can be organised in three categories as follows:

<u>Public Work 1</u>

The evolution of a Quality Assurance (QA) model for AIB over three iterations, being:

a) The 2013 Quality model – this was presented in two conferences. The first was a paper entitled 'An Action Research and Action Learning Approach to Quality Assurance with reference to Australian Institute of Business' at the First International Conference on Quality Assurance in Higher Education organised by the Accreditation Council of Trinidad and Tobago from 30 April to 3 May 2013 in Port of Spain, Trinidad (**Appendix A**). The second presentation was entitled 'The challenges of introducing a QA model using action research and action learning' at a conference organised by the Action Learning Action Research Association Inc from 23 to 24 September 2013 in Brisbane, Australia. (**Appendix B**).

b) The 2014 amended version – I presented this model with my colleagues Professor Angele Cavaye and Dr Ashok Chanda at the Work-Applied Learning for Change Conference organised jointly by the Global Centre for Work-Applied Learning and AIB held from 10 to 11 November 2014, in Adelaide, South Australia. Our presentation was entitled 'Developing and Implementing a QA model for Growing Private Higher Education Institutions' (**Appendix C**), and

c) The 2016 further amended version- I presented this model in a paper entitled 'Continuous Improvement and WAL' with my colleague Suresh Chandran at the Learning for Change and Innovation World Congress organized jointly by the Global Centre for Work-Applied Learning and the Action Learning, Action Research Association Inc. held from 7 to 9 November 2016 in Adelaide, South Australia (**Appendix D**).

These amendments to the QA model were made in response to various organisational issues as described in Chapter 4.

Public Work 2

Paper on Third Party Delivery (**Appendix F**) from the applications in 2015 by AIB for renewal of registration as a NUHEP and renewal of course accreditation to the Australian HE regulator, Tertiary Education Quality and Standards Agency (TEQSA). This is a comprehensive account of how transnational education through third-party delivery is quality assured by AIB with many of the mechanisms being unique to AIB and is an example of the thinking and practice that underpinned the development of the QA model presented as Public Work 1.

Public Work 3

Taking one step deeper into practice, and demonstrating how the day to day operations are impacted by the QA model in Public Work 1, the following policies which illustrate AIB's commitment to quality assurance are presented:

a) Delivery of AIB courses by Third Parties **(Appendix H)**
b) Assessment of Academic Qualifications Policy **(Appendix I);** and
c) Guidelines for Determining the Equivalence of Professional Experience to Australian Qualifications Framework Levels for Academic Staff (**Appendix J)**.

Hence, the Public Works present the development of the QA model, the application of the model to one specific area of practice, and then the operationalisation of the model through specific policy development. I was the sole author of all the Public Works save for the Assessment of Academic Qualifications Policy. Although I did not draft that policy, I was nevertheless heavily involved in providing input and amending both versions of the policy, as is clearly stated in its presentation.

In the next section, an overview of the Australian context in relation to the HE sector is presented as the background for my Public Works.

1.4 The Australian HE context

Since the late 1980s, the Australian HE sector has undergone significant changes. Dow and Braithwaite's (2013:6-7) list of changes includes the introduction of a national unified system, conversion of Centres for Advanced Education to Universities, demand-driven funding, and the establishment of a national regulator of HE, namely, the Tertiary Education Quality and Standards Agency ('TEQSA').

During this period, domestic enrolments in HE expanded significantly. The number of Australians with a HE qualification has grown from 3% in the mid-70s to over 25% at present. This growth has been partly due to a scheme of income contingent loans for student fees now known as the HE Loans Programme, HELP. This scheme has enabled the government to expand the HE system without relying solely on general public revenue while also providing financial access to university education (Lacy et al. 2017). Further student growth resulted from the opening up of the non-university HE provider (NUHEP) market after the introduction of the Australian Qualifications Framework and also a student loan scheme, Fee-HELP being extended to NUHEP students (Dow and Braithwaite 2013).

International student enrolments in HE also grew dramatically over this period, with an annual average growth of 11.9% compared to 3.4% for domestic students (Calderon 2019).

Declining government investment in HE has resulted in universities becoming more dependent on income from international students. In fact, between 2000 and 2017, universities received five times the revenue from international students as from the Australian government. (ibid). Despite this revenue growth, less money is spent on teaching, with responsibility for teaching devolving to casuals, while full-time academics are expected to prioritise research over teaching because it is more lucrative (Thornton, 2015).

Transnational education also grew during this period with multiple Australian universities setting up offshore campuses as well as developing sophisticated bridging and introductory programmes (Lacy et al. 2017:10).

The increasing reliance by universities on income from international students has led to a number of issues which suggest that academic standards have been compromised (Bretag 2015). These include falsification of entry documents, cheating in English language proficiency tests, online contract cheat sites selling assignments, widespread plagiarism, and cheating and fraud in examinations.

The Australian HE sector comprises: a) public and private Australian universities which have powers to accredit their own courses; b) Australian branches of overseas universities; and c) non-university higher education providers (NUHEPs) which have been authorised by the regulator to award HE qualifications ranging from undergraduate awards (bachelor's degrees, associate degrees and HE advanced diplomas) to postgraduate awards (graduate certificates and diplomas, master's and doctoral degrees).

The courses offered by these various types of higher education institutions (collectively referred to as 'HEIs') are required to comply with the Australian Qualifications Framework (AQF). Introduced in January 1995, the AQF (https://www.aqf.edu.au/) is a national policy for regulated qualifications from each Australian education and training sector, namely, schools; vocational education and training; and HE. The AQF provides the opportunity for NUHEPs to be given status to award undergraduate and postgraduate degrees just like universities, if they meet all the necessary requirements.

HE regulation prior to 2012

Prior to January 2012, each State and Territory had its own regulatory framework for the various levels of education delivered within its borders and which were based on the National Protocols for Higher Education Approvals Processes, 2000 and 2007 (National Protocols). Universities had been established by Acts of Parliament and could self-accredit their courses, and so were not significantly impacted by the state regulators, whereas NUHEPs were regulated at a State level, and hence their treatment differed according to their location and their regulator's interpretation of the National Protocols.

In South Australia where AIB is based, the HE regulator prior to 2012 was the Department of Employment, Training and Further Education ('DETFE'), which administered the *Vocational Education, Employment and Training (VEET) Act 1994* of South Australia (VEET Act) and its successor, the *Training and Skills Development Act* of *South Australia 2003*, as amended in 2008 ('TSD Act'). Under both the VEET and TSD Acts, organisations (usually privately owned companies) which met the requirements for provider registration and course accreditation would be authorised to deliver the courses and award AQF qualifications in their own right.

The accreditation process included examining course content, assessment methods, and staff qualifications. The course content had to be comparable to courses at the same level in similar fields at Australian universities as was the case for University providers also (National

Protocols 2000: s3.22). However, while Universities accredited their own courses, for NUHEP's each application for registration and course accreditation was reviewed by a Course Assessment Panel, appointed by the DETFE. This panel comprised representatives of the three self-accrediting South Australian universities as well as other experts. Thus, the applications for registration and course accreditation by AIB and other NUHEPS had to be approved by their direct, in State, competitors. The rationale for this process was to ensure the content of courses developed by NUHEPS was at an appropriate academic level and on par with universities, however the process was the subject of much criticism by NUHEPs (Phillips. 2008:29).

Establishment of TEQSA

A review of Australian HE in 2008, known as 'the Bradley Review' identified various deficiencies with the existing system. These included the fact that the regulatory frameworks utilised by the State and Territory governments for HE were applied unevenly so that not all providers were reaccredited on a regular basis (Bradley et al. 2008:115).

One of the major recommendations of the Bradley Review was that the state-based system of HE regulation should be replaced by an independent national regulatory body to regulate *all* HEIs. Consequently, the Tertiary Education Quality and Standards Agency ('TEQSA') was established pursuant to the TEQSA Act 2011. TEQSA commenced operations in January 2012 and introduced new HE threshold standards, namely, the Higher Education Standards Framework (Threshold Standards) 2011 ('2011 HESF') as well as increased rigour in the accreditation process.

The TEQSA Act confers TEQSA with the legislative powers to undertake its responsibilities as the HE regulator. All HEIs that offer HE qualifications in or from Australia must be *registered* by TEQSA. This was a new requirement for the university sector since previously, there were no external quality assurance mechanisms other than a five-yearly audit by the Australian Universities Quality Agency. The rationale for this change can be traced to the Bradley report (2008:121) that 'it is inappropriate and anti-competitive' that the university sector is exempt from the requirement to demonstrate at regular intervals that they continue to meet the requirements to operate.

In addition, the courses of study offered by HEIs must be *accredited* by TEQSA (TEQSA Act 2011:s.4). However, this requirement does not apply to universities since they have self-accrediting authority, nor to the few NUHEPS which have been granted self-accrediting authority status by TEQSA.

When TEQSA commenced operations in 2012, there were 42 Australian and overseas universities, and 121 NUHEPs, including AIB offering HE qualifications in Australia. As at December 2019, there were 43 Australian and overseas universities, 1 University College and 137 NUHEPs. It can be seen that the total number of NUHEPs has not increased very much since 2012, and this was due to the regulatory functions of TEQSA as well as the voluntary actions of the NUHEPs. Between January 2012 and June 2016, there were 27 registration applications by new providers, of which three were rejected. Of the existing NUHEPS, three had their applications for renewal of registration rejected, two had their registration cancelled, twelve terminated their registration and ten allowed their registration to expire. Hence while the total number of NUHEPs remained relatively stable, 27 institutions left the sector after TEQSA was established; had they remained, the number of NUHEPs would have expanded by over 20%. The turnover therefore accounted for 20% of the NUHEP market, which in practical terms is not insignificant.

1.5   Issues in the HE sector

As explained in section 1.4 above, in theory once their courses are accredited, NUHEPs have the same awarding powers as universities. However, in practice NUHEPs face several challenges which do not apply to universities, including the following:

a)   <u>Role of competitors in course accreditation:</u> All universities and 11 of the 137 current NUHEPS have self-accrediting authority and can therefore add, amend or discontinue new courses through their internal approval processes.

The majority of NUHEPs do not have self-accrediting authority and so they must go through a formal TEQSA course accreditation process each time they wish to add a new course to their scope. This course accreditation process (which is broadly similar to the process under the pre-TEQSA regime) involves scrutiny and approval by a panel of academics from other universities who have expertise in the discipline area(s) of the relevant course(s) for which accreditation is sought. While this process can be justified as quality assurance through peer review, it could be viewed as intrinsically flawed since competitors are sitting in judgement of a NUHEP's application for accreditation of new courses in a manner they do not have to endure themselves.

b)   <u>Over-regulation of NUHEPs</u>: The course accreditation process places many restrictions on NUHEPs, as evidenced by a submission to the Senate Select Committee on Red Tape by the Council of Private Higher Education, a peak body

which represents independent HE providers in Australia (now re-named Independent Higher Education Australia). The submission argued that the current HE policy settings and regulatory attitude favour publicly funded institutions at the expense of NUHEPs:

> ….public institutions are heavily subsidised, lightly regulated and free to pursue market and product development without external approvals. By contrast, private institutions [NUHEPs] operate without public subsidy, are extremely heavily regulated and effectively require government approvals for new sites, new courses, new delivery modes, permission to grow international student numbers and change of ownership (Independent Higher Education Australia 2018b:2).

c) <u>Inequitable treatment of NUHEP students</u>: Until August 2018, undergraduate students at NUHEPs and private universities who are eligible for FEE-HELP (a government loan) had to pay a 25% loan fee, but this fee does not apply to undergraduate students enrolled at public universities. However, in August 2018, students at private universities were exempted from the 25% loan fee by virtue of the Higher Education Support Legislation Amendment (Student Loan Sustainability) Act 2018**. This development has created greater inequity within the sector, since the 25% loan fee now applies only to students in NUHEPs (Independent Higher Education Australia 2018b).

Other regulatory issues that impact *both* the universities and NUHEPs include:

i) <u>Issues with TNE</u>: For many years education has been the third largest export sector in Australia. It contributed almost AUD30 billion to the economy in 2017 (Department of Foreign Affairs and Trade 2018). One result of this important contribution to the economy is that the various education regulatory frameworks (including National Protocols 2007; 2011 HESF; 2015 HESF; and TEQSA 2017a) emphasise that HEIs which deliver transnational education (TNE) through third-party arrangements are fully accountable for the quality of education and any services delivered by the third party. The HEIs must monitor and quality assure such third-party arrangements and ensure these comply with relevant protocols or standards. While this requirement is meant to ensure the quality of TNE through third party delivery, there is no recognition that allowances must be made in TNE for different cultures and different systems of education (Keay et al. 2014).

Rather than using third-party providers, some Australian Universities have set up campuses to deliver TNE, such as RMIT Vietnam (https://www.rmit.edu.vn/), Monash Malaysia (https://www.monash.edu.my) and Monash South Africa, since sold to a private provider (https://www.monash.edu/news/articles/change-of-ownership-for-monash-south-africa). They employ local staff and implement local systems (hence

effectively working like a third-party provider) but under the legal ownership of the host institution.

ii) <u>Volume of learning</u>: In 2011, the AQF introduced various changes to be effective 1 January 2015, including a volume of learning criterion to all qualification types (AQF Handbooks 2011 and 2013). The volume of learning in coursework master's degrees is set at typically 1-2 years, with the generally accepted length of a full-time year for educational participation being 1200 hours (AQF 2014a). If the student's prior qualifications and the Master's are in the same discipline, the volume of learning for deepening purposes is 1.5 years following a Level 7 [Bachelor] qualification or 1 year following a Level 8 [Graduate Certificate/Graduate Diploma] qualification. However, where the discipline areas are different, the volume of learning for broadening purposes is 2 years following a Level 7 qualification or 1.5 years following a Level 8 qualification. (AQF 2011:17). The rationale for the difference in duration was that '[q]ualifications in the same discipline designed to deepen existing knowledge and skills… are likely to require a lesser volume of learning to achieve the learning outcomes' (AQF 2014a:2).

At the time this change was announced, AIB offered a 12-month MBA course that was extremely popular. Direct entry into the MBA was available to applicants with a bachelor's degree, regardless of its discipline area. Applicants without an undergraduate degree but with at least three years managerial experience could enroll in the Graduate Certificate in Management and on successful completion, could proceed with advanced standing into the MBA. However, the new volume of learning requirement meant that only those applicants who had a bachelor's degree in business, management or commerce, could directly enrol in the MBA course. All other applicants had to first complete a Graduate Certificate in Management.

While it was theoretically possible for students to be fast-tracked though a qualification by intensive periods of study (AQF 2014a), the reality was somewhat different. The notion of work-based learning being included in the 'typical volume of learning' was not accepted since the hours required for the MBA study had to be in addition to work hours, rather than be included. Ultimately, each subject was delivered over a longer period and the 12-month MBA was replaced by a more traditional 18-month model.

Although the volume of learning for Masters degrees was later simplified to 'typically 1-2 years' by removing the former complex descriptions (AQF 2014b), accrediting authorities were required to ensure that the volume of learning takes into account 'the level of the previous qualification and / or knowledge and skills required for entry and whether the purpose is for deepening or broadening knowledge and skills' (AQF Addendum 2014:8), which in effect retained the effect of the removed descriptions.

Taking a critical perspective to this change, one might question the validity of 'volume of learning' in terms of a time period as an appropriate measure. It does not account for an individual's work circumstances, motivation, learning ability or experience; nor does it allow for innovative, accelerated learning techniques. Rather than focusing on outputs or outcomes, it is a measure of inputs and time, and hence is now being challenged in a recent review of the AQF. For example, a submission to the AQF review panel included the following comments:

> The current AQF specifications relating to course duration/volume of learning are ambiguous. There is a need to acknowledge that course duration and volume of learning may vary significantly among courses of similar AQF level … due to many factors, e.g. the proficiency of the learner on course entry and innovation in course learning, teaching and assessment methodology. In making this acknowledgment there is also a need for guidance on its application to ensure the comparability of learning outcomes of credentials within [the] AQF level is maintained. (Study Group 2018: 4-5).

It is encouraging that the review panel has recommended some major changes to the AQF in its final report (Review of the AQF Final Report 2019). The recommendation regarding volume of learning is that it should be retained as a benchmark expressing the notional duration for a new learner, of all teaching and learning activities required to achieve the outcomes specified for a particular AQF qualification type; and that regulators should use volume of learning as a benchmark for risk management purposes, rather than as a regulation.

iii. Attrition rate: TEQSA's Risk Assessment Framework (2018a) defines attrition as 'the percentage of first-year [HE] commencing students in a year who neither complete nor return to study in the following year' (2018a:21). The key performance indicators for attrition rates used within TESQA's Risk Assessment Framework are based on measures that are established within the traditional Australian HE sector. While AIB does provide attrition rates to TEQSA on a timely basis, internally we prefer to focus on completion rates rather than on the number of students who did not return to study in year 2. AIB's target market is the working adult and while students may take a break during their course for work or personal reasons, nevertheless they do complete their

studies within the maximum timeframe. It can be argued that completion rates are the more accurate measure of success, especially for providers who use flexible learning patterns to match students' life needs.

iv) <u>Academic staff on casual work contracts</u>: According to the TEQSA Risk Framework (2018a), HEIs should ensure that

> casual staff have adequate access to resourcing and support and are given the opportunity to integrate into the academic culture of the organisation. A significantly high proportion of casual staff increases the risk of these staff not being appropriately supported and resourced to provide a continuity of support for students, anchor academic activities, engage in scholarly activities, and be active contributing members in a community of scholarship. (TEQSA 2018a:17).

Hence, there appears to be an assumption that casual staff are not part of an academic community and are not sustaining their scholarship.

Harvey (2017) reports that internationally, reliance on sessional staff to undertake the teaching across HE organisations has become institutionalised and that the majority of university teaching in Australia is now undertaken by sessional staff. The advantage of employing a proportion of casual academic staff is that it provides more flexibility in maintaining an appropriate staff-student ratio. If the student numbers are less than expected for a subject, savings can be achieved by engaging less casual staff.

In addition to full-time academic staff, AIB engages sessional facilitators who have appropriate postgraduate qualifications *as well as* significant industry experience in the area they teach. Most of these facilitators have full-time jobs in their respective industries and they take up teaching jobs as casuals. AIB believes that the work-based knowledge these professionals acquire daily by holding down responsible jobs in their area of expertise is invaluable to their teaching. Knott et al. (2015:2) agree that the use of such 'teacher-practitioners' in HE has advantages as they assist in bridging the gap between theory and practice by bringing their professional experiences to the classroom; while also playing 'an invaluable role in maintaining currency of the curriculum because they are jointly involved in both the university and the workplace'. Thus, while HEIs should indeed support both their sessional facilitators and full-time academic staff to engage in scholarly activities and contribute to a community of scholarship, the currency of the workplace experience of the sessional facilitators should also be acknowledged.

Quality assurance in Australia tends to focus on what can be measured, rather than the appropriateness of what is measured, as exemplified by the casual work issue above. Arguably, this approach is quality control rather than quality assurance. The focus is on inputs, time frames and processes, with narrow definitions being applied, to the point that the sector is controlled as to its provision, rather than students being assured of its provision. As my interest lies in ensuring the appropriateness of the items measured in order to assure that a minimum threshold standard is being achieved, the contribution of my Public Works is how to move from quality control to quality assurance through a process of quality improvement.

The overview of the Australian HE sector is now followed by a summary of AIB's history up to the current time.

1.6 Milestones of AIB

AIB's history began in 1984 as Gibaran Management Consultants (Gibaran). It became a NUHEP in 1995, as will be described in Chapter 2.

From one to four NUHEPs

In response to requests from various colleges in South -East Asia to be permitted to deliver our courses, Gibaran embarked on its journey into transnational education (TNE) through third party delivery, with the approval of the state regulator, the South Australian Department of Employment, Training and Further Education (DETFE). As advised by DETFE, rather than proceed with TNE delivery under its own name, Gibaran set up three other NUHEPs between 2002 and 2004, namely, Entrepreneurship Institute Australia, Tourism Institute Australia and Australian Institute of Business Administration. Each NUHEP entered into third-party arrangements with approved colleges in select locations overseas to deliver their courses, as their Teaching Centres (TCs).

University application

In 2007, the National Protocols for Higher Education Approval Processes had introduced the criteria and processes for NUHEPs in Australia to operate with a specialised university title. We submitted our application to become a specialised university in 2009, on the basis that should our application be successful, the four NUHEPs would be consolidated to become a university. Unfortunately, our application was unsuccessful. The main reasons given to us were that our research output and financial resources were deemed insufficient. We were also privately advised that there had been several objections from the university sector but were not enlightened as to the basis of these objections.

Consolidation of 4 NUHEPs into AIB

Following initial registration as a NUHEP and accreditation of our courses in 1995, we had been successful in securing re-registration and having our courses re-accredited at five-yearly intervals in 2001 and 2006. However, during the 2011 renewal exercise, DETFE required us to consolidate the four NUHEPs into a single entity. The reason given was that in January 2012, all state regulators of HE would hand over responsibility for the NUHEPs to the new national HE regulator, TEQSA. The DETFE saw our renewal exercise as the perfect opportunity to insist on the consolidation of all four NUHEPs. We had been planning to consolidate into one entity in the future but were now forced to do this sooner than planned. As a result, the four NUHEPs were consolidated into AIB on 29 June 2011.

Partial dilution of shares

AIB had been a family business since 1984, with my husband Selva and I as shareholders and Directors. Three independent Directors joined the Board in 2013. In April 2015, we sold 50% of the shares to an equity company. As a result, a new Board of Directors was established, with three Directors appointed by the equity company and three by the Abraham family.

1.7 Overview of the context statement

Having provided an introduction to both the Australian HE sector and AIB, I will now outline the structure of the rest of this submission.

In Chapter 2, I review my personal and professional background as well as the experiences that have influenced my research. This reflexive insight outlines how I developed into the quality assurance practitioner that I am today and how this in turn has influenced the development of my Public Works.

Next in Chapter 3, I reflect on the methodology I have used to produce the Public Works, namely applying single, double and triple-loop learning through an action research action learning approach.

Chapter 4 is about the evolution of my QA model for AIB and an analysis of the challenges faced and how they were dealt with, the learning achieved and the impact on my professional practice. This chapter is the core of my Public Works, demonstrating the development of a high-level model of quality that is both philosophical and practical. Chapter 5 is a critical reflection on AIB's TNE delivery through third parties and demonstrates that even when quality control and quality assurance are achieved in terms of

meeting regulatory requirements and standards, the outcome may not be the quality outcome one is seeking. Chapter 6 is a deeper dive into quality assurance and policy development demonstrating how an iterative, action learning approach led to more robust policies. These two chapters illustrate how the higher-level model was implemented in practice, effectively going from the bigger picture down to the detail of implementation.

In Chapter 7, I provide some reflections on the ethical dilemmas I have faced in my role as well as the learnings I have acquired in the context of systems thinking, change agency and leadership.

Finally, Chapter 8 presents the conclusions of my critical reflection as well as the key learning to be drawn from my work and my future direction. The use of triple loop learning in the field of quality is a key feature of this chapter. The conclusions also focus on the need to question 'quality for whom' as the first step in any quality process, and to build quality assurance, control, compliance and improvement as appropriate from the answer to this question.

Chapter 2   My journey from legal practice to quality assurance

2.1 Overview

In this chapter, I reflect on the formative influences which have shaped my personal and professional life, my transition from legal practice to engage in the field of compliance and quality assurance in HE, and the learning that I took with me from my first career to the second. I have chosen to present my journey according to the following themes: parental ambition; being a lawyer; and my development as a systems thinker.

2.2 Parental Ambition

I grew up in Penang, Malaysia in a middle-class family. My father was a government servant and was involved in training new recruits to the civil service. In his spare time, he studied law by distance learning with the Inns of Court, UK but due to his family commitments, he could not afford to give up work to complete his legal training, despite his huge desire to do so.

As was quite common in Malaysia in the late 1930s, my mother's high school education was cut short as her marriage had been arranged with my father and in any event, the education of females was not considered important. Although my mother was denied the opportunity to complete her education, she never lost her thirst for knowledge.

Like many others, my parents wanted to give their children the opportunities that they had been deprived of. They saw the value of education as a means to a better future for their children and made many sacrifices so that they could finance our tertiary education. On reflection, this placed us under enormous pressure to be academically successful, but we coped at the time and performed well.

Both of my older sisters were the first in our very extended family to become medical doctors. Being something of a rebel, I did not want to follow in their footsteps. Instead, I decided to read law. This was for two reasons- the first was that the concept of fighting for justice appealed to my juvenile self and the second was to fulfil my father's fond hope that at least one of his children would acquire the law degree which he had been unable to complete.

My parents have been very strong influences in my life and even though they have passed on many decades ago, I am often reminded of their confidence that I would succeed in whatever I set out to do. I understand now that these formative influences have

subconsciously led me to always strive to live up to their expectations and never really consider the option of not succeeding at something – I have always expected I could and would.

2.3   Being a lawyer

In order to pursue legal studies, I had to move to Singapore as law courses were not offered at that time in Malaysia. This was a big step as I had to leave home and the close family relationships that had supported me until that time. This was the start of my independence. Once I had established my own identity as a legal professional, I never returned to Malaysia to work. I met my future husband, Selva, during my second year of studies and this also influenced my decision to live and work in Singapore after graduation.

I worked for more than 18 years as a legal professional, first in a bank and subsequently in private practice in Singapore, Perth and Adelaide.

Bank Legal Officer

My first job was as Legal Officer at the Singapore branch of the Banque Nationale de Paris. I was in charge of the Securities/Legal Department which meant I was the collector and custodian of bank securities such as mortgages of landed property and ships, debentures (floating charges), term deposits, bonds and shares as well as being the in-house legal counsel.

When I started, the department consisted of an administrator and myself. I soon found that the department had been badly managed, important documents were missing and records were not up to date. I had to work quickly to build confidence among the bank management that I was a capable manager. Thus, I had to put in place appropriate procedures to ensure all the required securities were obtained and safeguarded and manage the administrator who (rightly) expected me to provide her with appropriate direction. All of this was extremely challenging for a brand-new graduate with no work experience and no superior to act as mentor. I became skilled at being resourceful and developed the ability to seek out the known, experiment and adapt it to fit my needs and implement it – what I later discovered to be a large part of the action research cycle.

During the next few years, the department grew rapidly both in terms of the portfolio of securities as well as administrative staff. I was promoted to Senior Legal Officer and a second Legal Officer was soon appointed to assist me. Initially, I found it difficult to manage and motivate the growing number of staff as I lacked management expertise. Again, with

advice from my contacts who had a great deal of management experience, I learned how to engage better with the staff and found that by getting their buy-in on various issues, there was a significant improvement in staff morale. I understand now that this was a form of informal action learning, but at the time, it simply felt like survival.

I also acquired useful skills such as conducting internal seminars on legal matters for Bank staff and subsequently, public seminars organised by the Institute of Bankers. Importantly, I learnt how to deal with difficult bank clients as well as suppliers such as law firms who had grown complacent from being on the bank's panel of lawyers for many years, again through cycles of learning from experience, continuous improvement, and reflecting on my achievements.

After almost nine years at the bank, I no longer found the job to be challenging. My role had become routine and was focused on quality assurance and quality control, with limited opportunities for significant quality improvement. In order to further develop my professional knowledge and skills, not only in banking but in general commercial law, my next step was to become a legal practitioner in a law firm. Looking back now, this was when I first recognised the need for me to continuously improve rather than simply achieve to a standard.

This job at the bank had been a baptism of fire as I was given a department to manage without any formal training in management. I was quickly forced to put into practice the legal principles I knew in theory, and learned how to be resourceful in problem-solving, how to introduce quality assurance mechanisms, how to work with and motivate staff, how to deal with difficult clients and suppliers and how not to take people on face value (especially as some of the friendlier clients had turned out to be crooks). I learnt a lot about the practicalities of working, relationships, power structure and organisational dynamics. Only now do I appreciate that I also learned about quality and that this was the start of my journey as a quality practitioner.

Legal Practitioner in Singapore

In order to practice law in Singapore, law graduates must complete a pupillage with a law firm and be admitted to the Singapore Bar. Essentially a pupillage is a period of training where a law graduate (pupil) works under the guidance of a senior lawyer (Master) for a period of six months, to learn how to practice as a lawyer. As I had joined the bank immediately after graduation, I had not completed my pupillage and had to do so, before I could be admitted to the Bar.

In June 1983, a law firm took me on as a pupil mainly because of my banking experience. Initially, I found the pupillage a difficult experience. My Master had been my junior at law school but because he had been admitted for more than eight years, he was now a senior lawyer. I felt awkward taking instructions from him but as I needed to be admitted to the Bar, I learnt how to be a good pupil- to take instructions, act on them to the best of my ability and take feedback constructively. After six months of pupillage, I was admitted to the Singapore Bar in January 1984 and practised in the areas of conveyancing, corporate and trademark law in the same law firm.

Legal Practitioner in Australia

In November 1984, my family and I migrated to Perth, Western Australia and lived there for four years. In order to practice law in that state, I needed to be admitted to the Western Australian Bar and that required me to complete one year of legal studies and a six-month pupillage. On completion of studies and my pupillage at the oldest law firm in Perth, I was admitted to the Bar and then employed as a solicitor in the Banking and Finance Department at the same law firm. I worked there until December 1988, when we moved to Adelaide, South Australia.

In Adelaide, admission to the South Australian Bar was a pre-requisite for me to practice law. Since I had previously been admitted in Western Australia, the admission to the South Australian Bar was a formality. I joined the Banking and Finance department of a large law firm in Adelaide in February 1989 and became Associate Partner in mid-1991.

Due to the heavy workload, I often worked very long hours. I was lacking job satisfaction- I was churning out work which met the standards required for quality assurance but there was no room for quality improvement as the work was in a highly regulated area. I also wanted to spend some quality time with my children before they grew up, so I thought it would be better to set up my own law practice so that I could have more flexible work hours.

I started my own law practice in January 1993. At this time, I also enrolled in a Master of Law degree at the University of Adelaide as I wanted to further develop my knowledge base. To keep the overheads down, I worked from home with the idea that I would slowly build up a small practice and then move into an office nearby. However, within a very short time, I found that my main client was Gibaran Management Consultants (Gibaran), a consultancy firm which my husband Selva and I had established when we first arrived in Perth in 1984. I was instructed on a variety of legal matters such as the purchase of the office premises, contracts with suppliers, staff contracts and consultancy agreements and in effect I became

the company lawyer. Since all my time was taken up by Gibaran, it seemed pointless to continue with my own law practice (and pay a large insurance premium), so I wound up my law practice after 18 months and joined Gibaran on a full-time basis in July 1994. This move to Gibaran marked the end of my career as a legal professional, since my role soon evolved into compliance and quality assurance in HE.

When I reflect on my legal career, several common themes appear which, in fact, can be mapped against some of the quality characteristics described in Chapter 1.

a) In both the bank and in legal practice, irrespective of the jurisdiction, the client is "king". Being service organisations, the bank and the law firms placed great emphasis on being customer-focused, since the client always has a choice to move to the competition if they are not satisfied with the service provided. This customer focus aligns with the one of the definitions of quality referred to by Elassy (2015) namely, the 'importance of knowing who the customers are, what their needs are and how to satisfy them' (Elassy 2015:252). It also aligns with the quality characteristic of 'exceptional' where services achieve distinction and exclusivity through the fulfillment of high standards.

b) The services provided to clients must conform to the standards defined by the relevant regulatory bodies and any non-compliance could result in penalties. This concept aligns with the quality characteristic of 'Purposeful' where services conform to a stated mission/vision or a set of specifications, requirements, or standards, including those defined by accrediting and/or regulatory bodies.

c) Without being aware of it, I was starting to develop as a systems thinker during my legal career at the bank. According to Goodman (2018), systems thinking is a disciplined approach for examining problems more completely and accurately before acting. Crookes (2007) explains that systems thinking enables an understanding of the cause-and-effect relationships among data, information and people and that it improves decision making by focusing attention on the causes of performance problems and the system changes that will produce improved results. The bank was a 'system' made up of several elements such as policies, processes, practices and people that needed to work together for the whole to function successfully. I was responsible for working with my team and other departments to make changes to parts of the system such as policies, processes and practices to ensure that my department was working effectively. This aligns with a philosophy of continuous improvement where the system needs to constantly improve with each iteration.

d) I recognised the importance of deadlines and timekeeping in all aspects of my work in order to satisfy my clients' expectations. This concept aligns with the quality characteristic of 'Accountability' referred to in Chapter 1. As a good legal practitioner, I was expected to manage my time efficiently so that I could work on multiple matters simultaneously and produce high quality work to deadlines. If any crucial mistake was made in the work, there would be serious consequences as the client could sue the firm and I could lose my job. In certain circumstances, a lawyer could even be disbarred- lose their license to practice. Thus, I learnt to work long hours, to multi-task and to double-check every single detail, knowing that crucial mistakes could be made when rushing to meet a deadline. These are important skills that have been invaluable to me.

e) My years in the law firms taught me to be client-centered, to the point that I would end up sacrificing my personal life and family time to meet deadlines. This speaks to my personal judgement of myself as a 'quality lawyer' and the high expectations I placed on myself to continually do better.

f) I appreciate now that the area of law in which I specialised was one where the rules can be simply applied; there is no real opportunity for subjective interpretation of the rules and the relative power inequality of parties applying the rules is irrelevant.

2.4 My experience as a quality assurance practitioner

In this section, readers are reminded that references to 'Gibaran' apply for the period up to June 2011 when the name was changed to 'Australian Institute of Business' (AIB).

Although at first sight, the two professional areas of law and HE appear unconnected, they have certain similarities which have impacted on the way my professional identity has developed. An obvious similarity is that both professional areas have clearly articulated rules and procedures for good standing. As a legal practitioner, I was required to comply with professional rules of conduct when dealing with clients. In addition, a comprehensive set of legal principles applied to the legal work that I undertook. A major breach of professional rules of conduct could result in my disbarment by the Law Society and a mistake made in my legal work could result in serious consequences for my client. Similarly, HE in Australia is highly regulated, with the regulatory framework becoming increasingly rigorous over the last twenty plus years. NUHEPs such as AIB are required to be compliant with the HE regulatory framework in order to maintain their registration and accreditation - the license to operate. Any major breach of the regulatory framework could result in a loss of such license.

When I first joined Gibaran in 1994, my job title was 'In-house Legal Counsel'. I did not understand at the time that this was in fact a start of a new career in quality, as my role expanded over time to incorporate the responsibilities of office administration and evolved shortly afterwards into the position of Registrar and finally as Quality Director.

The milestones of my new career as a quality professional are as follows:

a) <u>Initial accreditation in 1995</u>

As explained earlier, the AQF provides the opportunity for non-university institutions to be given status to award undergraduate and postgraduate degrees just like universities, if they meet all the necessary requirements. When Gibaran decided to apply for such status in 1994, I was the obvious choice to investigate the requirements, because of my legal background. The application process required an understanding of the regulatory framework and supporting legislation and an eye for detail in complying with the documentation – very much a focus on quality control.

My research showed that the *Vocational Education, Employment and Training (VEET) Act 1994* of South Australia (VEET Act) provided the regulatory framework for HE in South Australia at that time. Organisations which met course accreditation and provider registration requirements would be authorised as 'approved education providers' and could deliver and award AQF qualifications in their own right. When I met with officials from the Department of Employment, Training and Further Education (DETFE) to start the application process for Gibaran to become an approved education provider, I was surprised to learn that this was the first such application that the DETFE faced. So, this application became a "test case" and a ground-breaking project for both DETFE and Gibaran.

After much discussion with several academics, we decided to apply for the accreditation of the Graduate Diploma in Work-based Management Learning course. This involved a two-stage process: first, Gibaran had to be *registered* as an approved education provider; and second, the course had to be *accredited* and listed on Gibaran's scope of accredited courses. I started compiling the evidence for the application for registration and set up a small team of academics to undertake extensive research on the curricula of similar courses offered by Australian and international universities before designing the curriculum for the course. This was my first real shift from quality control to quality assurance.

I managed the entire process of applying for registration and for accreditation, using the application forms provided by DEFTE and customising them where necessary. It was a stressful experience. Since this was the first application for DEFTE, there were no precedents to draw upon and I did not know the standards of evidence expected. DEFTE was unable to guide me and as we wanted to keep this application very confidential, I could not approach anyone for advice. I just had to use a logical approach with the documentation and hoped that it would be satisfactory. I recognise now that this is another instance of the confidence that my parents had instilled in me, as it did not really occur to me to question whether I would succeed.

DEFTE had the course curriculum reviewed by two academics from the University of South Australia. When the academics gave their approval of the course curriculum, DEFTE, in turn, approved Gibaran's application. On 9 November 1995, Gibaran became an approved education provider in South Australia, with the Graduate Diploma in Work-based Management Learning listed on its scope as an accredited course.

b) <u>The start of my compliance obligations</u>

As an approved education provider, Gibaran had various compliance obligations as set out in the VEET Act. An Academic Committee was established to monitor academic governance at Gibaran and was comprised of senior academics from various universities. The Academic Committee nominated me as the Registrar with responsibility for managing compliance with all regulatory requirements by Gibaran, because they believed that I would be best suited for the position due to my legal background. Thus, in mid-November 1995, I was appointed as the Registrar and was primarily responsible for quality control and quality assurance.

This new appointment was an exciting challenge for me as it was very different from what I had done before. In my previous jobs in Singapore, Perth and Adelaide, I had acquired extensive experience in banking and finance law and had learnt to maintain a balance between the needs of the customer and the legal and ethical limits of the legal profession.

With my new career, my practitioner identity changed as I was now obliged to operate in a compliance model in a very different industry, namely HE, where the balance had to be maintained between the customer who was the student and the regulator whose focus was that the student should have a positive learning experience. The concepts of compliance with HE regulatory requirements, quality and quality assurance, policies

and procedures pertaining to HE were totally new to me and somewhat daunting. Adding to the pressure was the knowledge that any serious non-compliance would result in penalties being levied on Gibaran by DEFTE. These ranged from a fine at the minimum and de-registration as an approved education provider at the maximum and any such penalty would naturally have drastic consequences on Gibaran, its reputation and image as a professional organisation.

As explained in Chapter 1, Gibaran was successfully re-registered as a NUHEP and its courses were re-accredited in 2001, 2006 and 2011 and was re-badged as AIB in June 2011.

c) <u>The need for a new QA model</u>

The transition in January 2012 from state based HE regulation to a national regulator, namely TEQSA and the introduction of the 2011 HESF was described in Chapter 1.

When I analysed the 2011 HESF that all HEIs needed to comply with, it became apparent that AIB needed a new robust QA model for a number of reasons, including the fact that our existing QA model was based on the superseded regulatory standards of DEFTE. Also, AIB was undergoing a period of rapid growth in terms of student numbers both domestic and overseas and a corresponding increase in academic and non-academic staff, with resultant changes in the organisational structure. In addition, the AQF had introduced additional requirements which would be effective from 1 January 2015. All HEIs were required not only to be compliant with the new requirements by that date but were also required to submit their AQF Transition Plan to TEQSA by 31 December 2013. Therefore, it was vital for AIB to have a QA model that could cope with the growing needs of the organisation and the changing regulatory environment.

2.5   Understanding who I am and how I came to be this person

Prior to undertaking this doctoral program, I had never really reflected on my life in any great depth. I realise through this reflective process, that I have been extremely fortunate. I had loving and supportive parents who ensured I had a good education up to university level, at a time when post-secondary education for girls was not common. After graduation, I had no difficulty in getting employment in Singapore, Perth and Adelaide. At each stage, there were a set of rules and regulations to be met, I met them and I progressed. My understanding of truth was defined by the law and legal practices and the application of rules and regulations. I appreciate that this is *my* understanding, and that everyone's 'truth' is different as they

experience the world differently. This insight emerged as I moved from my first to second career and I learnt that there were multiple ways in which quality could be interpreted and applied, and it underpins my belief in a philosophical approach to quality that starts with the question 'quality for whom?'

The development of my broader critical reasoning to 'bigger picture' issues, such as the potential bias in the application of a legal act, privilege within a system, and definitions of quality that favour the dominant discourse, was not consciously developed in my first career. I simply applied critical thinking in single and double-loop learning processes, by working out what was not being done that needed to be done to meet the requirements, and then altering the system accordingly to ensure that the problem does not recur. At no point did I really stop to question whether the system was the right system, who it might be 'right' for, and how it could be made 'better' and 'for whom.'

Through this doctoral process, I now understand that my epistemology, or the way I learned to 'know' and construct knowledge, stemmed from my legal training and the early years I spent working within the law where there are rules, regulations and regulators. You must work within those boundaries or you lose your license to practice, and in the area of law that I practised, there was no real room for subjective interpretation. Coupled with this was the confidence which led me to believe that I could learn to master anything because anything could effectively be mastered. In short, I knew the world as a servant who could do what they wanted provided they met the rule book requirements, and I suspect that that is probably still a relatively good description of how to survive in the legal profession in the area that I worked in.

However, when I moved into the field of education, I found that the rule book was open to multiple interpretations and it appeared to be applied differently in different circumstances, subject to, for example, power differentials that were outside of my influence. I found that my way of knowing had been reaffirming my understanding of success. I was a self-fulfilling prophecy of single and double-loop learning creating successful outcomes.   Until this time, my epistemology and ontology were aligned. This was not the case in the field of education and I had to find a new way of understanding the world in order to succeed. No longer were the single and double loop learning processes sufficient and I had to find a new way of understanding that allowed me to succeed in a regulatory environment where the goalposts moved and were open to interpretation, and the 'judgement' of success was no longer an objective measure. The triple-loop learning approach not only helped me make sense of my

world, but also influenced my approach to quality, helping me develop what I now term my 'quality philosophy'.

While my epistemology and ontology had happily sat together in my legal career, the world of education uncovered a massive gap between the two and I had to discover a new way of knowing to understand my new way of experiencing the world. I had to question my understanding and experience of 'quality'; experience the paradox of the rigidity of the regulatory framework and the subjectivity of how it was applied within the HE sector; and question my way of working and what I was doing until I reached the fundamental question of 'quality for whom'?   Understanding this gap and transformation in my thinking took me through a process of single, double and triple-loop learning that I explore in the next chapter.

Chapter 3   Generating a Specialised Framework for Quality Assurance

3.1   Overview

In this Chapter, I reflect on the single, double and triple loop learning that enabled me to produce my Public Works and outline how the Action Research Action Learning (ARAL) method facilitated this process and brought about the organisational change that occurred from the implementation of my work.

3.2   Continuous Improvement through loops of learning

As we develop a body of public work and are immersed in the process, it is often difficult to step back and realise the contribution we are making and the methodology we are engaging in during the process. This is what Schön (1983) referred to as *reflection-in-action* rather than *reflection-on-action*. To do the former, we need a raised sense of awareness during the process - a sort of 'thinking on our feet' (Schön 1983:54).

Thompson and Thompson (2008:27) use the term *critically reflective practice* to emphasize that a critical 'edge' to both reflection and practice is essential. They describe a critically reflective practitioner as:

> someone who is not only self-aware, but also socially and politically aware – able to 'tune in' to the bigger social picture that plays such an important part in shaping people's lives, the problems they experience and the potential solutions to those problems. (Thompson and Thompson 2008:29).

When I critically reflect back *on action*, to make sense of it and try to learn from it (Thompson and Thompson 2008), I can see now that my development as a quality assurance practitioner was influenced by my upbringing and early career decisions, but I was not aware of this at the time. At the time, I believed my actions were driven by business needs and personal ambition and the gut feeling that there was a better way – I realise now that they represent the three loops of learning both for myself and AIB as part of an organizational learning process.

It has been found that successful organizations are 'characterized by their strategic determination to learn, their involvement to continued experimentation, and their attentiveness to learn from their experiences, whether they are failures or success' (Fillion et al. 2015). Organisational learning occurs when individuals who experience a problem, inquire into it on the organisation's behalf and find a mismatch between the expected and actual results of action. Through a process of thought and further action, they modify their understandings of organisational phenomena and 'restructure their activities so as to bring

outcomes and expectations into line, thereby changing organisational theory-in-use'. (Argyris and Schön (1996:16). In essence, this is what occurred through the process of developing the work underpinning this Context Statement as outlined in Chapter 4.

Further, organizational learning is a 'process of change in thought and action – both individual and shared – embedded in and affected by the institutions of the organisation' (Vera and Crossan 2004:224) and is 'individual and collective learning in an organisational context that contributes to changed organisational behaviour' (Britton 2005:55). Such changed practice is evidenced through the application of the ARAL method and the implementation of the new QA model, particularly with reference to the Teaching Centres as outlined in Chapter 5.

Argyris and Schön (1974, 1978) have identified two levels of organizational learning: single-loop and double-loop. Single-loop learning occurs 'when an error is detected and corrected without questioning or altering underlying values of the system' (Argyris 1999:68). In the organizational context, single-loop learning is about finding out what the problem is and how things could be done more effectively, rather than asking why the problem has occurred (Kwon and Nicolaides 2017). In single-loop learning, we question how things are done (Altmann 1998) and ask ourselves: '*are we doing things right?*' (Flood and Romm 1996:158). To some people, error detection and correction is the end of the quality process. When coupled with knowledge accumulation, dissemination and retention, this reflects quality control (Wang and Ahmed 2002).

Double-loop learning occurs if 'error is detected and corrected in ways that involve the modification of an organization's underlying norms, policies and objectives' (Argyris and Schön 1978:3). This process involves 'questioning underlying organization policies and objectives' (Argyris 1977:2). Organisations engaging in double-loop learning 'consistently test assumptions, identify the roots of problems, and are open to fundamental rethinking of strategy' (Roper and Pettit 2002:259). Thus, double-loop learning goes deeper than single-loop learning as we question underlying purposes and why things are done (Altmann 1998) and ask ourselves: '*are we doing things right and are we doing the right things?*' (Flood and Romm 1996:159). This is another acceptable end of the quality process for some. A focus on error-prevention and a zero-defect tolerance culture, coupled with knowledge refinement and knowledge creation through incremental changes leads to total quality (Wang and Ahmed 2002).

A further type of organisational learning, namely triple loop learning, has been conceptualised by various authors (Flood and Romm 1996; Romme and Van Witteloostuijn 1999; Snell and Chak 1998; Swieringa and Wierdsma 1992; Yuthas et al. 2004). It is worth noting that whilst triple-loop learning 'has been inspired by Argyris and Schön, the term does not appear explicitly in their published work' (Tosey et al. 2011:292). It has been described as the basis for processes of profound change (Peschl 2007) and as resulting in a transformation of the structural context and 'transitions of the whole regime (e.g. change in regulatory frameworks, practices in risk management, dominant value structure)', a change in paradigm and ultimately in underlying norms and values (Pahl-Wostl 2009:359). Swieringa and Wierdsma (1992) as cited in Altmann (1998) note that in triple-loop learning, we question the essential principles on which the organisation is based and challenge its mission, vision, market position and culture. The core question in triple loop learning is 'what makes this the right thing to do?' (Hummelbrunner and Reynolds 2013:1).

The new HE regulatory framework that was introduced by TEQSA, namely the 2011 HESF can be construed as 'a transformation of the structural context….. and…. transitions of the whole regime' as posited by Pahl-Wostl (2009:359). It was a national framework that applied to the whole HE sector, unlike the state-based previous regimes which only applied to the non-university sector. It was very detailed and prescriptive and required many new processes and policies to be introduced by the HE sector. On reflection, the experience at AIB could be argued to be both single-loop learning (in some aspects where we corrected errors without modifying the system) and double-loop learning where we changed processes and systems to demonstrate compliance with the new framework.

In their conceptualization of triple-loop learning, Flood and Romm (1996:159) introduce a political dimension by looking beyond 'what is the right thing' towards appreciating that the right thing might appear 'right' because of the power invested in those who espouse what is right; and ask the question: 'is rightness buttressed by mightiness and/or mightiness buttressed by rightness?' The new HE regulatory framework was managed by the regulator who had a relationship of power with 'might over right' (Reynolds 2014:1383) over all NUHEPs. It was the asking and answering of the question 'quality for whom' that resulted in the triple-loop learning described in this Context Statement. Rather than simply adhering to the procedural requirements of the legislative bodies, my questioning of 'quality for whom' added an ethical depth of questioning and analysis that goes beyond the efficiency and effectiveness approaches required for compliance.

This is not simply a questioning of the mission of the organisation, but a deeper normative approach (Roper and Pettit 2002) to genuinely challenge what you are doing and how from an ethical standpoint, which can result in some hard business decisions being made. An example is the ending of transnational education as the question of 'quality for whom' gave us a perspective of our partners that made us realise many were not necessarily striving for quality for their students. This is outlined further in Chapter 5.

Since an organization is a group of individuals working together for a common purpose though a structured system, when individuals learn something, the collective learning resides within the body of the organization (McClory et al. 2017). If individual knowledge does not enter distinctive organisational thought and action, the organisation knows less than its members (Argyris and Schön 1996). It is up to organisations to proactively create the conditions that encourage organisational learning, 'through processes and procedures, the cultural and political environment, recent experiences, and the value placed on learning by management' (McClory et al. 2017:1326). The development of the QA model-in-use in AIB (Public Work 1) is a good example of what Argyris and Schön (1996:16) call 'learning products of organisational inquiry…..as learning must include evidence of change in organisational theory-in use.' The QA model is in effect one of the artefacts of learning, 'embedded in the images of organisation held in its members' minds' (ibid).

The extent to which the QA model has been embedded and continued to function at AIB post my leaving, is testament to the extent to which organisational learning did occur. Staff involved in the ARAL cycles of the QA model (Public Work 1) engaged in double-loop learning when identifying the roots of problems and working to modify the organisation's underlying norms, policies and objectives, with the objective of continuous improvement.

Such continual improvement can shift you from 100% compliance as you move the boundaries of what is being complied with (hence risking non-compliance during the change process) – and softens the boundaries of what is and is not considered to be within an acceptable limit, since the notion of continuous improvement inevitably means the limit of acceptability continually moves. Again, moving such limits risks a period of people working outside the new limits while they learn how to work within them, such as when a new policy is being implemented (as in Public Work 3).

The reality of organisations means that different people are engaging in different tasks at the same time, as happened in ARAL Cycle 2 (described in Chapter 4), and hence their activity and learning did not wait for others in the organisation. The drawing together of the various

teams in the action learning process ensured that the learning was shared, taking us through to Cycle 3, and allowed us to explore how our actions were impacting on each other, and hence the ultimate simplification of the model as the learning outcome activity became the norm.

Wang and Ahmed (2002) believe that to succeed, organisations need to focus on triple-loop learning, as it involves constantly questioning existing products and systems and seeking to increase organisational competency to create value in the target market. Looking back on my Public Works, I can see how I was taking a triple loop learning approach to the development and promotion of quality to create value for AIB as a premier NUHEP, while most in the organisation were only concerned with single or double loops. This fundamentally challenged my work, and at times led me to compromise my philosophy for pragmatic outcomes, having to revisit and rebuild the philosophical aspects later. This is particularly evident in the development of the QA model itself, under the pressure of a TEQSA submission. While initially there was agreement and buy-in for the triple loop learning approach as explained in Chapter 4, when time was getting tight, the pressure to revert to the set boundaries within a single and double-loop approach became more attractive than the permeable boundaries offered in the triple-loop approach. This resulted in the model being modified to a simplified version that made the single and double-loop elements more explicit and the triple-loop element was tacit.

The argument I make here is for a greater need for broader triple-loop learning across the whole HE sector to bring about systemic change and move it beyond a compliance and control culture which, perhaps, underpins the current criticisms of players in the sector that they are outdated, not relevant and not related to industry, and hence are producing unemployable graduates (Cox 2016). The sector needs to explore who its customers are and to whom they are providing a service, in order to interpret their regulatory framework from a customer perspective rather than from that which serves the public institutions (Jamieson 2018).

The HE sector both in Australia and internationally including the US and UK is facing many problems, such as the increasing cost of university education, the need to replace traditional teaching methods with more interactive and collaborative options and the rise in academic plagiarism through essay mills and paper help services (Allaire 2018; Davies 2017; University of Western Australia 2018). AIB prides itself on its point of difference being that it does address these criticisms of relevance and industry relatedness. AIB's target market is the working adult with the aim of helping students convert theory to practice. The curriculum

and assessments are geared towards the application of management concepts to the workplace and the facilitators are required to not only have the requisite academic qualifications but also have industry experience in the areas they teach. This approach may be unfamiliar to the rest of the HE sector with its current academic-focussed roles and practices, or simply ahead of the times.

I call my approach to quality a 'philosophy' as it is a system of ideas. It is a system that is underpinned by my epistemology stemming from my development through the legal system; it is a system underpinned by a triple-loop learning approach that questions whether we are doing the right things in addition to doing things right; and it is a system that is customer-centric and seeks to continually improve and make 'things better', always asking the question 'better for whom'? It is not a system based only on compliance and control but one that seeks to move beyond those notions, seeing them as single bricks in the wall rather than the wall itself. This is my quality philosophy and it is this that I took forward in my Public Works. While I am not removing the need for compliance and control in the ideas that underpin my philosophy, I am putting these within the boundaries of the contextual questions of 'quality for whom, and for what purpose?' and all the implications of the answer to that question.

My Public Works therefore demonstrate how one can embed such a philosophy into a quality framework to bring about continuous improvement while focussing on compliance and control. This also requires a broader, systems thinking approach to quality which essentially moves it from quality control to quality assurance.

The way in which I embedded this philosophy in practice was through an Action Research Action Learning (ARAL) approach in my development of the QA process itself. In the next sections, I will describe the process I undertook in the development of the QA model, and how the ARAL approach was implemented at the oversight level of the QA model, in the implementation of the model through the example of our TNE practice, and at the policy development level. This demonstrates the ARAL method from macro down to micro level engagement.

3.3 My Research in the Australian HE Context

As with any piece of research, the starting point in the development of a QA model was to research what was already known and published in the field. In an attempt to identify good practice and process in quality assurance which I could adopt or adapt for AIB, I undertook a

review of some quality management models. Becket and Brookes (2008) have identified seven different quality management models developed for industry that had been adopted or tested within HEIs on a global basis. These are Total Quality Management; European Foundation for Quality Management; Balanced Scorecard; Malcolm Baldridge Award; ISO 9000; Business Process Re-engineering (Romney 1994) and SERVQUAL (Parasuraman et al. 1985).

Sohail et al. (2006) note that the application of these quality management models in HEIs has led to a number of improvements in areas such as customer service, administrative processes, staff and faculty morale and strategic and budget planning. However, Srikanthan and Dalrymple (2002:215-216) assert that these models are less applicable to the academic functions of a university 'in view of their tenuous fit with the core operation: education'.

Becket and Brookes (2008) further identify fourteen quality management models that have been developed specifically for HE. These include the Model for Quality Management in Education (QME) of Srikanthan and Dalrymple (2002, 2003, 2004); Excellence Model (Pires da Rosa et al. 2001, 2003); and Quality Management Framework (Grant et al. 2002, 2004). Most of these models are discounted by Becket and Brookes (2008:45) because they 'tend not to be as comprehensive in their approach to quality management as the industry models', with the exception of Srikanthan and Dalrymple's QME model (2002, 2003, 2004); since it concentrates on student learning and academic productivity which are fundamental to HE.

AIB needed a QA model which would not only have the foci as established by Srikanthan and Dalrymple (2002, 2003, 2004), but would also enable it to cope with the changing regulatory environment, the registration and accreditation requirements and continuous improvement processes.

3.4 Adapting the Action Research and Action Learning (ARAL) method as a HE quality process

In view of the above need, I searched for an alternative model and reviewed Action Research as a practical research method. In undertaking this review, I became aware of the Action Research Action Learning (ARAL) method also referred to as the Work Applied Learning (WAL) approach (Abraham 2012, 2015) which was researched and explored by Selva Abraham as a method for introducing and sustaining change.

The term 'Action Research and Action Learning' was first used in 1996 by Abraham, Arnold and Oxenberry in their conference paper 'The Self-Discovering Organisation: Fusing Action Research to the Learning Organisation' (Abraham et al. 1996). They argue that Action Learning could be considered as a subset of Action Research and proposed the 'ARAL' process that fuses the two separate concepts of Action Learning and Action Research.

Action Research (Lewin 1946, 1952) and Action Learning (Revans 1983) are similar in some respects as both are problem-focused, action-oriented and utilise group dynamics; but they also have some differences. Revans describes action learning as the process of 'comrades in adversity learning from and with each other through discriminating questioning, fresh experience and reflective insight' (Smith 1998:246). In his learning theory, Revans (1982, 1989) formulates this process as

Learning=Programmed knowledge from the past + Questioning insight (L=P +Q).

Action Research, on the other hand, was designed as a means by which change could be introduced in problematic situations to bring about a noticeable improvement. It is essentially cyclical in nature with planning, acting, observation, reflection/evaluation and validation. Action research requires some systematic approach to data collection for validation purposes, while action learning does not (Lewin 1946, 1952).

Whilst researching into the ARAL method, I observed that although it had not previously been used in the HE sector nor specifically for quality assurance, it had been validated by several researchers who used this method in their Master or Doctoral studies in various other sectors such as shipping (Hashim 2001); construction (Ang 2016; Bong 2016; F'ng 2014; F'ng 2016; Mah 2016; Karvinnen 2002; Khaw 2016; Khoo 2016; Tang 2016); public sector (Daton 2007); project management (Khan 2014); and the defence industry (Holyoake 2016). Currently, research using this model is being undertaken at Doctoral level in the oil and gas industry and in the healthcare sector. Further details of this research are provided in **Appendix E.**

I had lengthy reflections and consultations with Selva and Jonathan Garnett on the ARAL approach which is an exploratory research design (Abraham 2012) and was convinced that it could be used to develop and implement a suitable QA model for AIB. It would be easy to assume this choice of method arose out of convenience; after all, AIB was promoting and researching WAL as a methodology. However, this was not the case. My choice of implementing ARAL as a process was deliberate, because other options appeared deficient

as they seemed to operate at a single point in time rather than supporting an iterative, continual development process.

When reviewing the ARAL method, I perceived that reflective practice is an integral part. Reflective practice as a process was embedded in much of the AIB course pedagogy and was a focus of research activity, however it was not culturally embedded in the way that AIB operated as a business itself. Hence the introduction of ARAL to any AIB process would bring about a shift in culture. As with most family businesses, decisions tended to be made according to family position and relationships. Introducing ARAL challenged this decision-making process and at times tested family relationships as the reflective process led to conversations occurring that made it acceptable to challenge each other and our work in ways we had not previously engaged.

The cyclical nature of the ARAL method (Abraham 2012:5) is shown in **Figure 3.1** and captures the single, double and triple loop learning.The Figure shows how Cycle 1 tends to focus on individual learning – the single- loop of 'what did I get right and wrong, and how do I fix it so I do not make the same mistake again'. Cycle 2 then takes us to team learning – the double-loop process of the team exploring how they need to change their practices as a team in order to prevent the situation arising in the future where such an error could be made. Cycles 3 and 4 look at the triple-loop learning where the organization starts to question what it is doing and why, and the change processes that result from asking and answering these questions.

Abraham's (2012) conceptualization of the link between individual, team and organizational and the three learning loops aligns with the views of Yeo (2002), who explains that the capacity to learn is motivated by the various goals at each stage. Individual goals are addressed when correcting errors in individual inquiry to maintain organizational norms (single-loop learning); team goals are more relevant to double-loop learning where changes in behavioral patterns are required 'to accommodate inquiry into changing norms'; and in triple-loop learning, organisational goals are relevant, since it is concerned with the overall vision and purpose of the organization (Yeo 2002:159).

Figure 3.1 Cyclical Nature of the ARAL Method
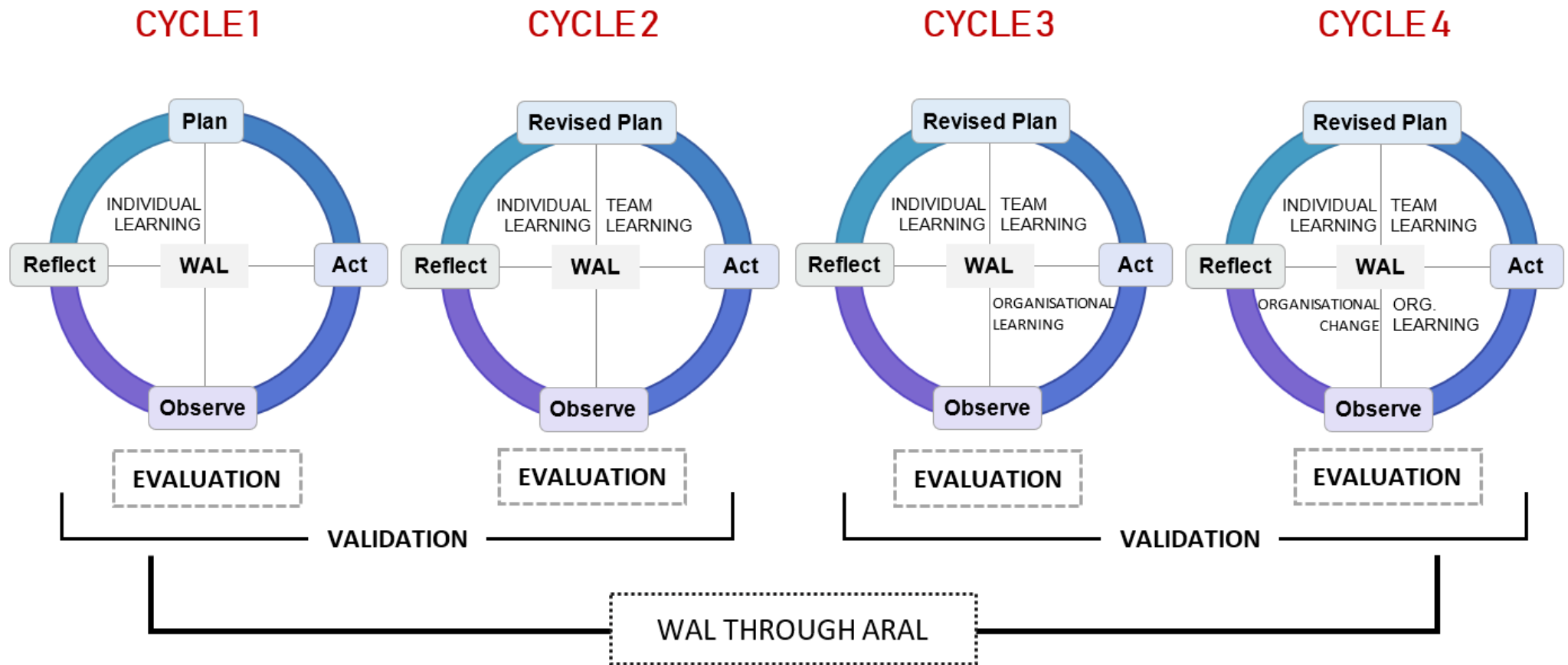
2011 © Abraham

Some key processes that are unique to the ARAL model need to be mentioned here. Firstly, as I moved from individual learning to team learning, by getting the QRC on board, the Committee members themselves stepped back to Cycle 1 and had their own personal learning experience. Then as we moved to Cycle 3 and the model was adopted across the organization, other members of the organization reverted to Cycle1 and had their own individual learning experience, and hence the cycles co-existed in parallel for different members of the organization in the same time period. It is not a time-bound linear process.

The second unique ARAL element to be considered are the 12 characteristics of Action Research (AR) that are identified by Abraham (2012; 2015). In **Table 3.1,** I demonstrate how these AR characteristics were evidenced in AIB during the QA model development process.

Table 3.1 Characteristics of Action Research that emerged at AIB

Element	Descriptor summary	As evidenced in AIB
Problem focus	ARAL method starts with a problem in real life	The problem under consideration was the revision of the QA model to meet the growing needs of AIB as it expanded in the Australian HE sector
Action orientation	Action has to be part of the process, not simply planning	The QA model was implemented and revised from its first iteration in 2013
Cyclical process	The process needs to work in cycles of planning, acting, observing, reflecting, evaluating/validating.	Each iteration of the model went through this process as outlined in Chapter 4
Collaboration	Collaboration is vital as this is a participative methodology that is 'completed with people' rather than 'on them' or 'done to them'	The model was developed, implemented and evaluated by those working with it, and hence revised in directions that were not necessarily the direction that I personally wanted it to go
Ethical Practice	Groups of people with limited power are open to exploitation and hence the consideration of their needs is important	At AIB this involved considering the academics, the students, the professional staff and the TNE partners (see Public Work 2 for example)
Group Facilitation	The success of the method depends on how well the group can operate as an effective team	This was, at times, challenged by the family business structure, and the peculiarity of the working relationships that exist within such a structure
Creative Thinking	This should occur naturally as the group progresses through the cycles	This is exemplified by the nature of the changes to the model that occurred in the various iterations

Element	Descriptor summary	As evidenced in AIB
Learning and re-education	As the knowledge base iterates and change, new learning occurs	The challenging of the notion of quality being a philosophy rather than an outcome exemplifies this process
Naturalistic	The methodology is founded on qualitative processes rather than scientific testing	The exploration of cause and effect occurs through implementation and observation and feedback rather than some clear measurement or tick box
Emancipatory	The methodology allows for social change and reform to bring about wider change in the group	The challenge to the TNE process that explores the cultural appropriateness of TNE in itself is an example of that
Normative	The norms of the group change as the group learns throughout the process	This occurred as the QA model cycled through its various iterations
Scientific	The methodology is conducted in such a manner that can be defended for its rigour	This context statement and doctoral submission is evidence of this

Source: Adapted from Abraham (2015:7-9)

While this chapter introduced the concept of the ARAL method, the next chapter reflects on how it was used in developing and implementing the quality assurance process for AIB.

Chapter 4   Public Work 1- Planning and implementing a QA model for AIB

4.1   Overview

This chapter describes how the ARAL method was used in developing and implementing the quality assurance process for AIB and walks through the cycles outlining each element as they occurred. While Cycles 1 and 2 clearly achieved individual and team learning, the extent to which organisational learning and organisational change occurred is debatable, and while the ARAL model is an ideal of how to bring about change through action research, the reality – as discussed in the following chapters – is often less straightforward in terms of outcomes, even when the process is adhered to.

4.2   AIB's organisation structure

AIB's organisation structure as at June 2013 is depicted in the organization chart set out as **Figure 4.1.**

AIB has three main arms of governance: Board of Directors, Academic Board and Management Committee. The Board of Directors has responsibility for all AIB's activities including its HE operations. The Board members have different professional backgrounds and expertise, including HE and finance and meet six times per year.

The Academic Board is responsible for the academic governance of AIB's HE operations. It is made up of internal and external members, all of whom are experienced academics. The Academic Board meets a minimum of six times per year. It has several sub-committees, one being the Teaching and Learning Committee which monitors the coursework degree courses, namely, the Bachelor of Business Administration and Master of Business Administration courses. Another sub-committee is the Research and Higher Degrees Committee which monitors the Master of Management, Doctor of Business Administration and Doctor of Philosophy courses. The other two sub-committees are the Ethics Committee and the Student Appeals Committee.

In 2013, the Management Committee of AIB comprised two Joint Chief Executive Officers (Joint CEOs), the Learning and Teaching Director and the Financial Director. One Joint CEO oversaw Academic Operations and Corporate Affairs and the other had responsibility for Marketing, Finance and Human Resources.

Figure 4.1   AIB's Organisation Chart as at June 2013
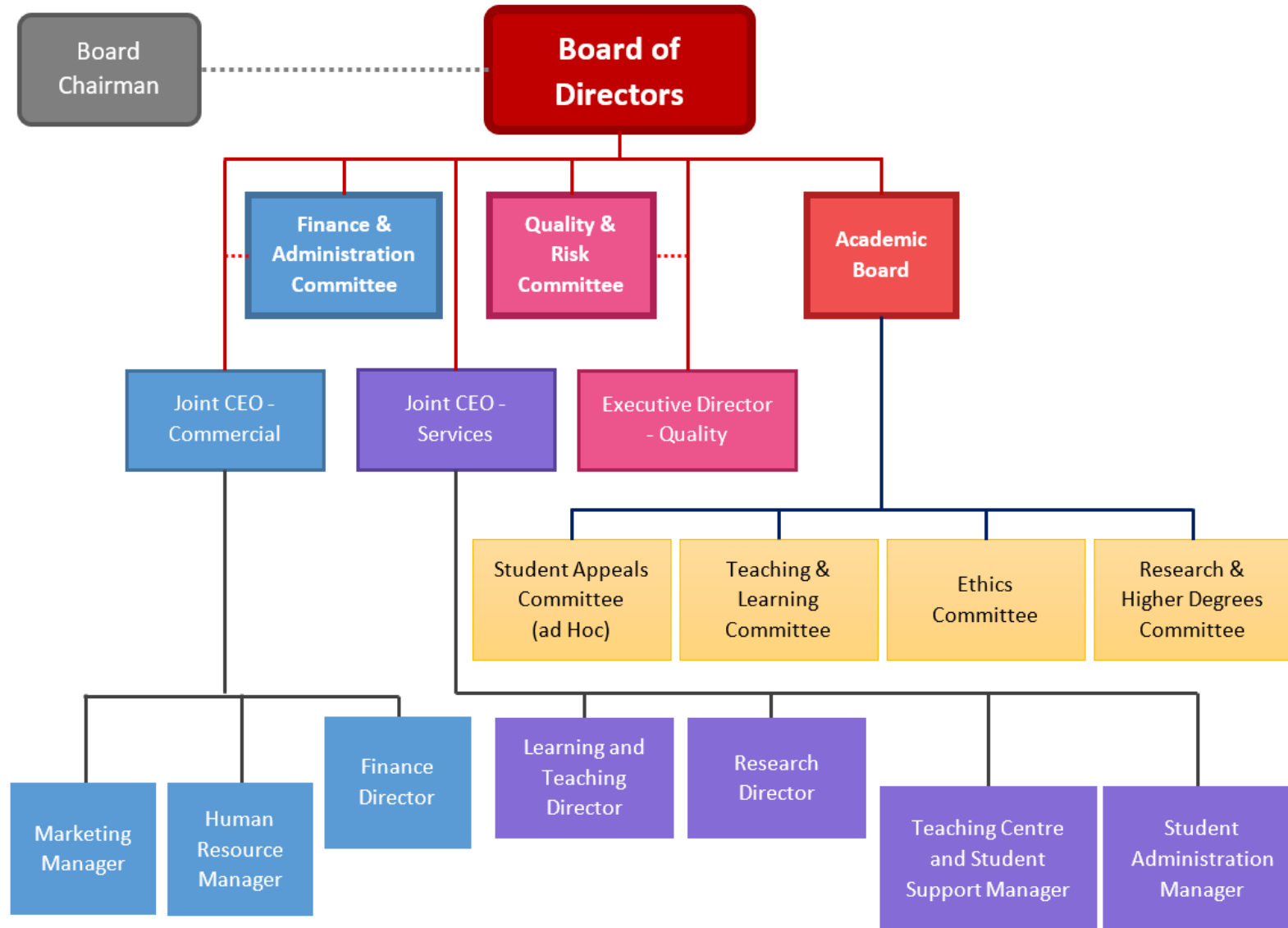
In mid-2013, the Board of Directors established the QRC based on my recommendation that this committee should oversee the quality assurance aspects of AIB. In recognition of the pivotal role of quality and compliance in HE, this committee reports directly to the Board of Directors. At this time, the Chair was an external member with the other members being the Chair of Academic Board, the two Joint CEOs and myself as Executive Director, Quality. The terms of reference require this committee to be the' quality watchdog' for the Board of Directors by:

- monitoring an appropriate QA model for AIB which complies with professional standards and legislative requirements;
- ensuring that policies and processes for the identification, assessment and management of risks, quality control and the management of compliance with external standards and legislative requirements are developed and implemented; and
- providing regular reports to the Board of Directors.

4.3 The ARAL method

The QA model for AIB evolved from the original 2013 version to the 2014 version and finally to the 2016 version during the AR cycles described below:

4.3.1 AR Cycle 1: 2013 QA model

a) *Planning stage of the 2013 QA model*

With the help of Selva, who agreed to act as my Facilitative Consultant, I developed the design of the 2013 AIB QA model.

Part A of the 2013 QA model (**Figure 4.2**) concentrated on the Academic and Research sections of AIB and their compliance with the *2011 HESF Course Accreditation Standards.* The Academic section manages all aspects of delivery of the coursework degree courses; while the Research section oversees the research degree courses and research activities.

Part B (**Figure 4.3**) focused on the Academic Operations, Human Resources and Marketing and Finance sections of AIB and their compliance with the *2011 HESF Provider Registration Standards.*

Figure 4.2   Part A of the 2013 QA model

Figure 4.3   Part B of the 2013 QA model

AIB QUALITY MODEL - PART B
ACADEMIC OPERATIONS, MARKETING, FINANCE & HUMAN RESOURCES

STRATEGIC PLAN

STRATEGIC GOALS & TEQSA STANDARDS

IMPLEMENTATION/ EVALUATION/ VALIDATION OF OPERATIONAL PLANS

QUALITY & RISK COMMITTEE (AR GROUP)

BOARD OF DIRECTORS

MANAGEMENT COMMITTEE

Annual Academic Operations Strategic Goals mapped against TEQSA Standards & External Validations

Annual Marketing Strategic Goals mapped against TEQSA Standards & External Validations

Annual Finance Strategic Goals mapped against TEQSA Standards & External Validations

Annual Human Resource Strategic Goals mapped against TEQSA Standards & External Validations

PLANNING · ACTING · OBSERVING · REFLECTING

ANNUAL PLAN IMPLEMENTATION

MANAGEMENT COMMITTEE

QUALITY & RISK COMMITTEE (AR GROUP)

BOARD OF DIRECTORS

MEANS JOINT OBSERVATION AND REFLECTION

WORK-BASED LEARNING PHASE

PLANNING

ACTING/OBSERVING/ REFLECTING
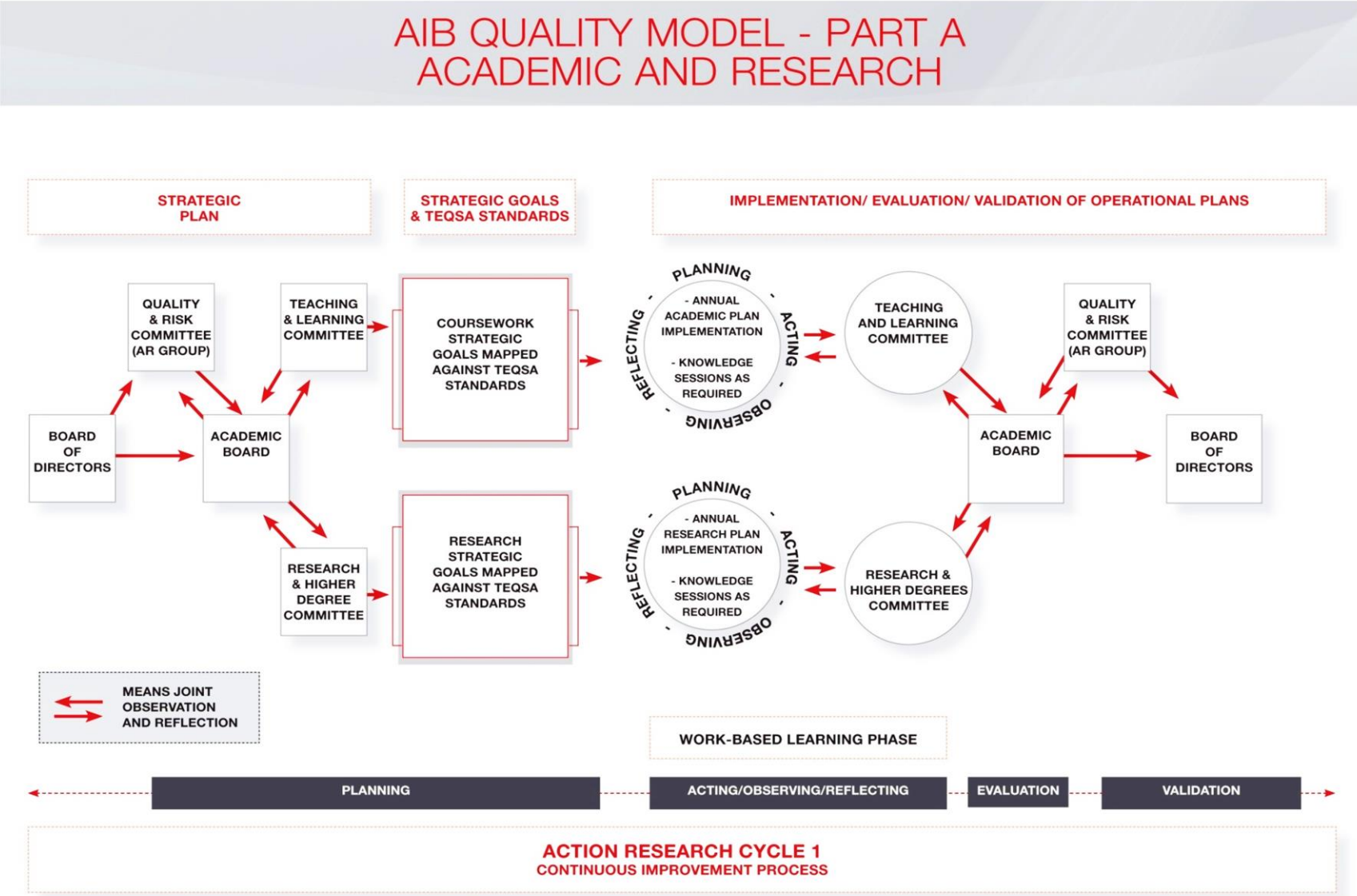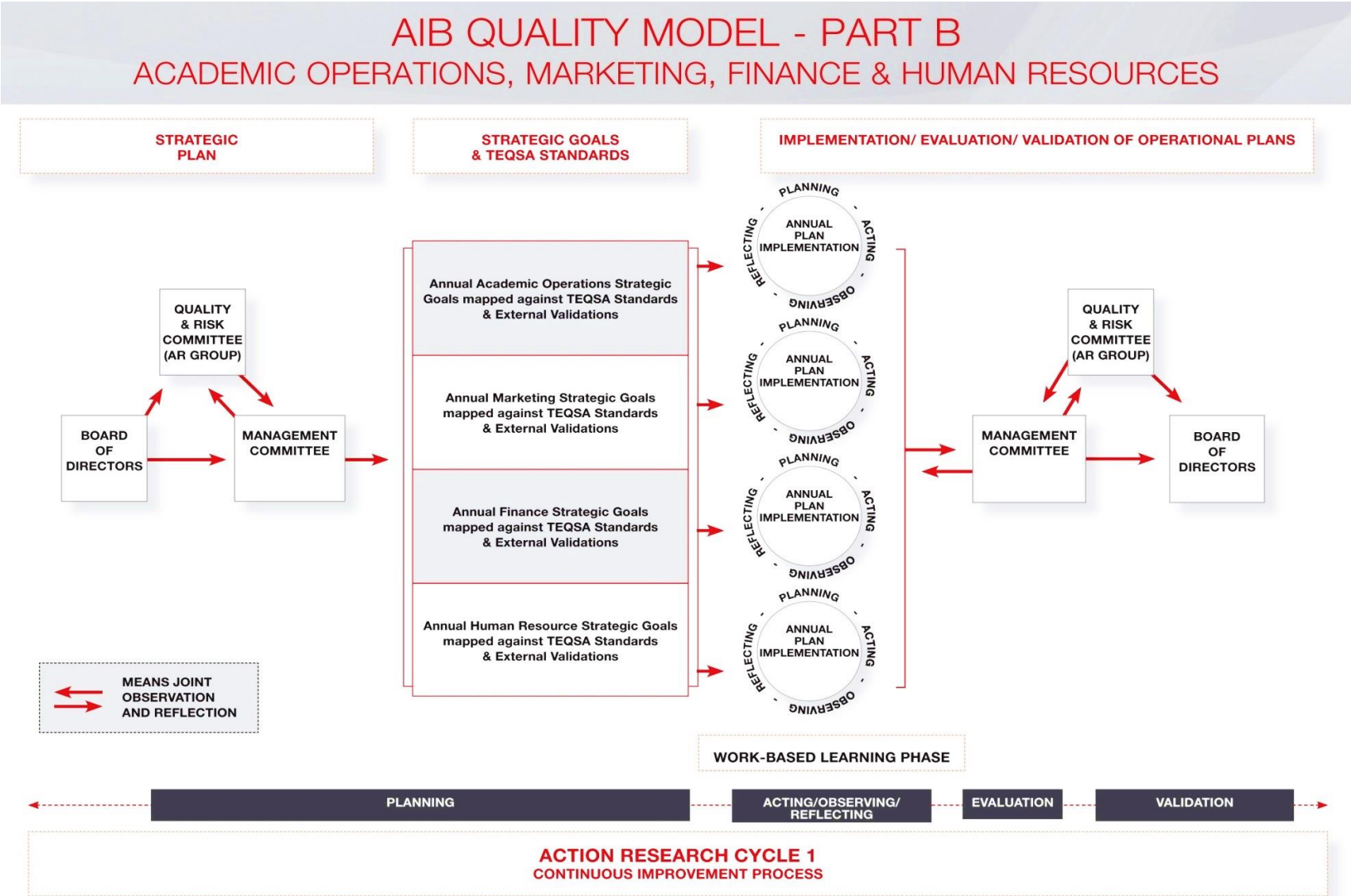
EVALUATION

VALIDATION

ACTION RESEARCH CYCLE 1
CONTINUOUS IMPROVEMENT PROCESS

Both Parts of the 2013 QA model were designed to respond to the AIB Strategic Plan, Strategic Goals and 2011 HESF Standards. The Strategic Plan is developed by the Management Committee, with input from the Academic Board and is approved by the Board of Directors. It is for a period of three years and sets out strategic goals (in this case, they were mapped against the 2011 HESF standards) and annual operational goals for each section of the business. Each section in AIB is required to develop and implement its annual operational plan.

The 2013 QA model incorporated various phases within each AR cycle of a typical WAL program (Abraham, 2012, 2015). These include Planning, Acting, Observing, Reflecting, Monitoring, Evaluation and Validation. Taking for example Part A of the QA model- the Academic and Research sections- the following phases were proposed:

i) *Planning Phase*: As the Board of Directors had given the QRC (QRC) the mandate to monitor the quality assurance processes at AIB, the QRC was designated as the AR Group for both Parts A and B. The QRC would be mentored by Selva Abraham as the WAL expert. During Cycle 1, the AR Group would meet as often as necessary with the WAL Expert to clarify its terms of reference, the roles and responsibilities of the various committees involved and to fine-tune the processes involved in the implementation of this QA model.

There would be extensive consultation between the Academic and Research sections and their respective reporting committees to agree on the implementation of their Annual Academic Plan and Annual Research Plan, including a quarterly schedule of activities and expected outputs. The outcome of the planning stage was for clear quality plans to be in place to monitor, assure and review outcomes against objectives in each of the two business areas (academic and operations). The means by which data was to be collected and evaluated were established as the research element of the ARAL method.

ii) *Acting Phase*: Each section would act as an Action Learning team to implement its annual operational plan and monitor and collect data as planned. This would involve regular meetings to delegate tasks, report on results and reflect on the process, as well as keeping accurate records of minutes of all meetings, re-planning and repeating the cycle of activities. If the section head decided that new conceptual or technical knowledge was required for the implementation of

the annual operational plan, formal or informal workshops could be delivered by internal staff or external experts.

iii) *Joint Observation/Reflection Phase*: During each quarter, there would be ongoing observation of and reflection on the implementation process of the Annual Academic Plan and Annual Research Plan between the respective Chairs of the Teaching and Learning Committee and Research and Higher Degrees Committee with the Director of Learning and Teaching and Research Director respectively. Progress reports would be reviewed at each meeting of the respective committees.

iv) *Evaluation Phase*: At the end of the quarter, the respective Chairs of the Teaching and Learning Committee and the Research and Higher Degrees Committee would formally present reports on their findings, conclusions and recommendations to Academic Board, for discussion and evaluation.

v) *Validation Phase*: At the end of AR Cycle 1, the implementation process would be validated by two external validators. They would review the reports from the various committees and provide a report to the QRC on their findings and recommendations for further improvement. The QRC would then analyse the reports from the various committees and from the external validators and provide the Board of Directors a summary of the outcomes for the quarter, including any issues or deviations identified from such analysis. Any issues or deviations would be referred back to the relevant committee to take such further action as appropriate and the QRC would monitor and report to the Board of Directors on the outcome.

The processes in AR Cycle 1 would be repeated each quarter as part of the ongoing ARAL method.

For Part B of the 2013 QA model (see Figure 4.3), a similar process of planning, acting, observing, reflecting, evaluating and validating was planned with the Management Committee taking the role that the Teaching and Learning Committee and the Research and Higher Degrees Committee played in Part A.

As can be seen from the above, the 2013 QA model was a rigorous approach designed to ensure that the strategic goals set out in the AIB Strategic Plan as well as

the 2011 HESF Standards were continually addressed by the appropriate sections. The QRC was responsible to the Board of Directors to make sure that this quality assurance process was ongoing and was implemented effectively and efficiently.

The 2013 QA model was approved by the QRC in September 2013. I have presented this model at two separate conferences in 2013. The first conference was on Quality Assurance in Higher Education held in Port of Spain, Trinidad and organised by the Accreditation Council of Trinidad and Tobago. My paper was entitled 'An Action Research and Action Learning Approach to Quality Assurance with reference to Australian Institute of Business' (see **Appendix A**). The second conference was organised by the Action Learning Action Research Association Inc in Brisbane, Australia. My presentation was entitled 'The challenges of introducing a QA model using action research and action learning'. (see **Appendix B**). The model attracted considerable interest at both conferences as well as constructive feedback. It was also published in 2016 as an example of the use of work-based learning and WAL to enhance the intellectual capital of organisations. (Garnett et al. 2016).

The expiry date of AIB's registration as a NUHEP and the accreditation of its courses was 1 July 2016. As the TEQSA Act required applications for renewal of registration and accreditation to be submitted at least six months in advance, AIB's applications were due by 31 December 2015. It was public knowledge that due to TEQSA's heavy workload, many NUHEPs were experiencing significant delays of between 12 to 18 months in having their renewal applications processed. In order to give our applications as much lead time as possible, we planned to submit by June 2015, a full twelve months in advance of the expiry date. Thus, it was time to start implementing our QA model.

b) *Implementation Stage of the 2013 QA model*

In mid-2013, an external consultant had undertaken a gap analysis of AIB's compliance with the 2011 HESF standards and had identified a number of gap areas, such as developing a Business Continuity Plan; documenting our intervention strategies for "at risk' students; and reviewing existing processes such as IT governance, and detection and prevention of fraud. Our internal reviews of the Risk Management Plan, Teaching and Learning Plan and Research Plan also identified several areas of improvement.

A Quality and Risk Implementation Plan (being a term preferred over 'Quality Assurance model' by the various stakeholders - management, Board of Directors, Academic Board and colleagues) was drawn up with three cycles. Cycle 1 from November 2013 to July 2014 would comprise three components: Registration projects, Curriculum Review and Compilation of the TEQSA applications. In Cycles 2 and 3 (from August to December 2014 and January to June 2015 respectively), there would be further improvements to the applications as well as ongoing continuous improvement projects.

A total of 43 projects were identified to address the gaps found by the external and internal reviews and these were allocated to various colleagues to work with their teams (as Action Learning teams) to complete by certain deadlines. Implementation of these projects commenced in November 2013. However, a major problem soon arose.

c) *Observation/Reflection stage - Issues with the 2013 QA model*

Several stakeholders did not support the 2013 QA model. The respective Chairs of Academic Board, Teaching and Learning Committee and Research and Higher Degrees Committee, who were all external to AIB, had major roles in the implementation of the QA model. They expressed concerns that the model would require a great deal of time commitment from them; however, they were mistaken as their role was to *oversee* the outcomes of the AR cycles, rather than undertake any of the actual work. The Joint CEOs were also unhappy with the model as they felt it was too complicated and seemed too time-intensive. They pointed out that the projects were extra work for the project owners. The Board took note of these various concerns and in December 2013, decided that the quality process should be simplified and driven by internal staff as far as possible and requested that the QA model be revised accordingly.

I was naturally disappointed with the Board's decision. However, after some reflection, I began to accept that although the QA model seemed appropriate to me, it could seem overwhelming and complicated to others. I recognised that I had not done a good enough job of explaining the rationale and methodology behind the model, particularly its implementation and the roles and responsibilities of those involved. Also, AIB was undergoing great change in terms of rapid growth of students and staff and such expansion was being perceived as needing a complete transformation of its academic and non-academic operations from a quality perspective. All the stakeholders including the Board wanted a "simple QA model without bells and whistles" in the

words of one Joint Chief Executive Officer. I accepted that I would have to develop a QA model that would seem simpler and yet have all the rigour that was needed to achieve the goal of not only compliance with the regulatory standards but also ongoing continuous improvement. The AR Cycle 2 of the QA model development process was therefore about managing perceptions and adapting based on evaluation and feedback.

4.3.2   AR Cycle 2: 2014 Revised QA Model

a) *Planning stage of the 2014 QA model*
The Quality and Knowledge Management Director who had joined the Quality Team in October 2013 worked with me, under the guidance of Selva as WAL consultant, to develop a revised QA model in February 2014 as shown in **Figure 4.4.** The revised QA model had the same stages and the same timelines as the previous version but these were re-named as Major Cycles. There were three tranches relating to quality outcomes for the business as follows:

1. Tranche A - Registration Process: – this consisted of ensuring AIB's compliance with a) the 2011 HESF standards for registration as a NUHEP; and b) the standards applicable to teaching overseas students in Australia, namely the *Education Services for Overseas Students Act 2000* (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students. I facilitated this tranche in my role as Quality Director. The deliverable for this tranche was the finalised application to TEQSA for re-registration as a NUHEP.

2. Tranche B - Re-accreditation Process**:** - this comprised the course review and accreditation programme, which was led by the Academic Director who had replaced the Learning and Teaching Director. Each AIB course of study would be benchmarked with similar courses offered by competitors and updated or amended as necessary, and then reviewed against the 2011 HESF Course Accreditation standards by a panel of external academics and industry professionals. The deliverable for this tranche was the finalised application to TEQSA for course re-accreditation.
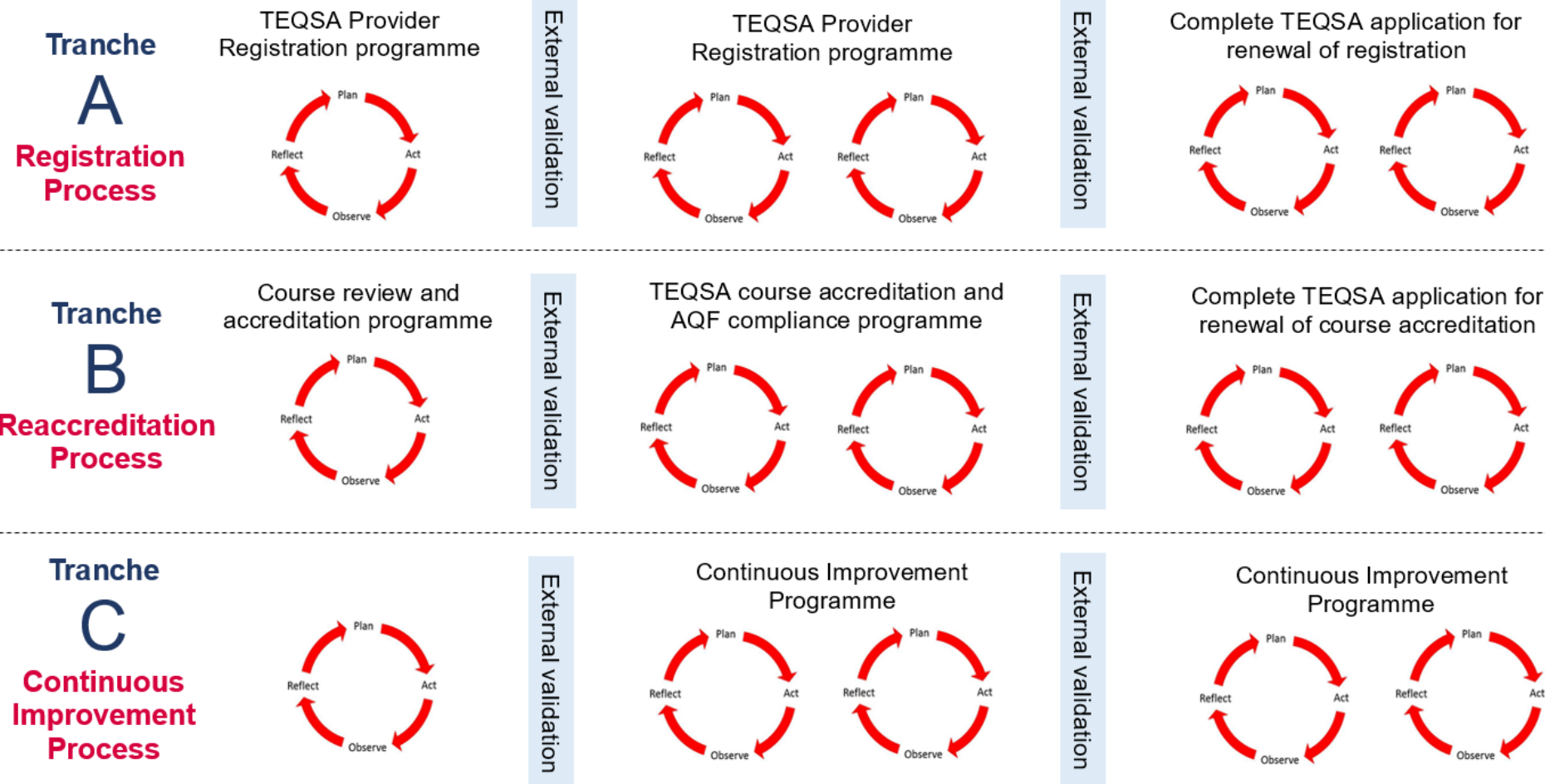
Figure 4.4 - 2014 Revised QA Model

3. <u>Tranche C - Continuous Improvement Process:</u> – the Quality and Knowledge Management Director facilitated the various continuous improvement activities set out in the Quality and Risk Implementation Plan. These included the four strategic initiatives for the Quality Team in the AIB Strategic Plan: a) Build a dedicated Compliance and Quality portfolio at AIB; b) Obtain ISO certification; c) Conduct annual independent third-party audits to ensure AQF and TEQSA compliance; and d) Achieve and maintain local, national, and global accreditations and registrations. The output for this tranche was an on-going process of continuous improvement and risk management being embedded at AIB.

This amended model was approved by the QRC in March 2014 and was accepted by the various stakeholders- the Board of Directors, Academic Board, Teaching and Learning Committee, Research and Higher Degrees Committee, and the Joint CEOs. The feedback was that the model was clear and easily understood. In fact, the Joint CEOs set up a Steering Committee with the Quality Team to monitor the progress of the Quality and Risk Implementation Plan.

b) ***Implementation stage of the 2014 QA model***

The implementation of the Major Cycles 1 to 3 with respect to Tranches A, B and C is described below:

<u>2014 QA Model Major Cycle 1 – November 2013 to June 2014</u>

As this Cycle had, in fact, commenced under the 2013 QA model, we continued monitoring the nine projects in Tranches A and B which had not been completed by their due dates. Realistic extensions were negotiated with the project-owners and the projects were subsequently completed by the extended dates. For certain projects such as reviews of the AIB Governance structure, Risk Management Plan and Business Continuity Plan, we decided to engage external consultants as they would have specific expertise and be able to devote concentrated time on the project.

I learnt several lessons in this Major Cycle 1, the most important being to 'keep it simple'. The revised 2014 QA model was accepted because it was easier to understand than the original. The revised model, like the original, had the same timelines, as well as regular reporting of the progress to the Board of Directors and Academic Board. The main difference was that the three tranches of the revised model clearly set out the main focus areas of the 2011 HESF standards: the re-accreditation

process, the re-registration process and the continuous improvement process. This was a case of single-loop learning as defined by Argyris and Schön (1978: 2-3): 'When the error detected and corrected permits the organization to carry on its present policies or achieve its present objectives, then that error-and-correction process is *single-loop* learning'. I solved the resistance to the initial model by introducing a simpler-looking model, although it still retained the important features of the initial model.

Another lesson was that deadlines on projects need to be realistic and should be negotiated with the project-owners rather than be imposed on them. If the project-owner is not committed to the project and does not see the 'big picture' of what the organisation is trying to achieve, they will not necessarily be interested or willing to push themselves to complete their project by the stipulated deadline. In other cases, even where the project owner was committed to the project, they were unable to complete by the due date because of their workload. As a result, many projects were completed between one to three months after their original due dates.

The Quality and Knowledge Management Director who was the facilitator of Tranche C - Continuous Improvement Process unexpectedly resigned in mid-June 2014 due to illness in the family. As she had been on extended personal leave before then, many of her projects were behind schedule and had to be re-allocated to several colleagues.

2014 QA Model Major Cycle 2 – July 2014 to December 2014

Work continued on overdue projects as well as on new projects that commenced in Major Cycle 2. While most of these projects were completed on time, others required further extensions for completion due to heavy workloads of the staff.

The AIB Human Resources Director took over the responsibility for Tranche C: Continuous Improvement processes as he wanted an opportunity to implement certain ideas in this area. He introduced a Continuous Improvement Plan for improving quality at AIB which included the following elements:

- The Current Measures: How will we know where we stand in quality today?
- The Aim: *What are we trying to accomplish? (How good do we want to get and by when?)*
- The Improved Measures: *How will we know a change is an improvement?*
- The Changes: *What change can we make that will result in improvement?*

The problem however with this Continuous Improvement Plan was that the Human Resources Director did not have any experience in implementing it and suggested certain impractical processes and projects that the stakeholders disagreed with and did not support. As a result, no new projects were undertaken for Tranche C during Major Cycle 2. Fortunately, Tranche C was deemed as not immediately crucial for the renewal applications and so we decided to review this matter in Major Cycle 3.

This issue with the Human Resources Director and the lack of progress by the Quality and Knowledge Management Director- both very senior staff- made me recognise that the understanding, commitment and ideas that I had about quality were actually unique to me, were tacit and were my philosophy of quality. Because I knew what I meant and wanted, I assumed that others were on the same wavelength, but it was clear that they did not really understand what they were doing or why. I became aware that my way of 'being' in quality was not 'the way of being', but it was actually my ontology and mine alone. I needed to do something to share this more explicitly.

A further complication arose in August 2014 when TEQSA sent us an email specifying the additional evidence that they required to be included in our applications for renewal of registration and accreditation. This was an important development as it gave us a clue on the areas that TEQSA would focus on. We therefore had to ensure that these additional items of evidence were checked for completeness if they were already available. Other evidence had to be collated, such as statistics on admission decisions in the last twelve months. The review or collation of these various items were assigned as new projects to relevant staff.

One of the problems during this Major Cycle 2 was the lack of staff with expertise in quality in HE to assist me after the departure of the Quality and Knowledge Management Director. Our recruitment firm advised that there appeared to be a shortage of suitable candidates in this area, so I canvassed my network of QA professionals and heard that a friend who was a Quality Officer in another NUHEP might be interested to move. As she had extensive experience in managing renewal applications at her college, she would be a very useful addition to the Quality Team. I was very pleased when she joined AIB as Quality and Compliance Manager in December 2014. I had found a kindred spirit with a good understanding of quality in HE.

Most of the projects in Tranches A and B were on track and the QRC had been providing progress reports on the Quality & Risk Implementation Plan to the Board of Directors at each meeting. However, in mid- December 2014, upon noting that the proposed date of AIB's submission of renewal applications to TEQSA was only six months away, the Board insisted on the following changes:

a) that AIB's preparations for its renewal of registration as a NUHEP and course re-accreditation should be fast-tracked and all outstanding activities in Tranches A and B should be completed well in advance of the submission date to enable all documentation to be thoroughly checked; and

b) that a Renewal Steering Group ('RSG') comprising one Joint CEO, the Academic Director, the Quality and Compliance Manager and myself should meet weekly to develop action items and monitor their completion.

The Board had invoked a 'command and control' leadership style which is based on establishing and maintaining power over and control of people and organizational processes (Anderson and Anderson 2010). They took charge and brought forward the end date of the activities in Tranches A and B and added one more committee- the RSG- for the purpose of keeping the implementation process on track.

As required by the Board, the Quality Team revised its planned schedule of activities so that all actions could be completed by April 2015 with May and June being available for last minute checking and fine-tuning of the documentation prior to submission at the end of June.

On reflection, I appreciate that the Board's actions stemmed from the following factors: a) the majority of the Board members were external and had no previous experience of a renewal of registration and accreditation exercise and therefore did not know what to expect; and b) they were aware that some long-standing NUHEPs were having difficulties with their renewal applications with TEQSA and were keen to ensure AIB's applications had the best chance of success. The lesson for me was that it is very important to educate the stakeholders thoroughly about the implementation process, the regulatory environment, the status of NUHEPs who have applications in the pipeline ahead of us and that we should have faith in our process and in ourselves.

In the first Major Cycle, I had the single loop learning of simplifying the presentation to allow people to understand it. In this second Major Cycle I had the double loop learning of realising that the management of perceptions is an ongoing activity which

requires checks and balances at various time points in order to continually underpin the buy-in to a simple model when stakeholders do not really understand or support the process. Ideally, I would have achieved this buy-in, but the Board's need for and understanding of quality was not philosophical but more focussed on compliance only.

2014 QA Model Major Cycle 3 –January to June 2015 (extended to June 2016)
As this was the last six-month cycle before submission of the applications to TEQSA, there was an increased sense of urgency within the Quality Team and senior management to complete all outstanding matters. This was further compounded when the Board of Directors requested more frequent progress reports on the status of our renewal applications. In response, we adopted a renewal process model as shown in **Figure 4.5** to assist in our reports to the Board.

It became clear by March 2015 that the submission date would have to be pushed back from June to August at the earliest, as several documents were not yet ready including responses to recommendations from external audits. Hence Phase 11 in Figure 4.5 shows early August as the applications submission date.

The role of the various parties in the model is set out below:

1. *Renewal Steering Group (RSG)*
   This internal group met weekly to ensure this process progressed in a systematic manner. The first stage was to identify the main gaps and plan the necessary steps. Its main role was to collate information, review it for completeness, send out the information to the external experts in Phases 4 and 8 and finalise the applications for review by Academic Board and the Board of Directors before submitting to TEQSA.

2. *Internal staff*
   Staff from various departments were required to collate and provide such information as was required for the applications.

Figure 4.5- Registration and Accreditation Renewal Process Model – 2014-2015

Phase 11 (early August 2015) Applications Submit	→ **TEQSA**
Phase 10 (mid July2015) Review by Academic Board / BOD	→ **Academic Board / BOD**
Phase 9 (late June – mid July 2015) RSG finalises applications	→ **RSG**
Phase 8 (by mid June 2015) Dry audit by 2-3 external auditors	→ **Dry Audit** a. *expert 4* b. *expert 5* c. e*xpert 6*
Phase 7 (mid May 2015) RSG prepares for dry audit	→ **RSG**
Phase 6 (Late April – Early May 2015) AIB staff complete action items	→ Academic Team CEO Team (inc. TCs) Finance Marketing + Comms Student Support Research **Quality and Compliance**
Phase 5 (mid April 2015) RSG analyses experts' reports	→ **RSG**
Phase 4 (late March –early April 2015) External review by experts	→ **Governance + Accountability** *expert 1* **Teaching and Learning + Research** *expert 2* **The Student Experience** *expert 3*
Phase 3 (March 2015) RSG prepares for external review	→ **RSG**
Phase 2 (Feb-March 2015) Internal Staff 'Do'	→ Academic Team CEO Team (inc. TCs) Finance Marketing + Comms Student Support Research **Quality and Compliance**
Phase 1 (January-February 2015) Plan and Identify gaps	→ **RSG**

3. *External Experts*

These experts were appointed in Phases 4 and 8. Phase 4 was the Review phase where three experts each focussed on a discrete area. They critically reviewed the information and evidence provided to them and advised AIB of their findings, recommendations for improvement and assisted in amending or developing any documentation. Phase 8 was the "dry audit" phase where three other experts audited AIB against the 2011 HESF standards. Here too, each expert focused on a discrete area and advised us of any deficiencies in our application and how to address them.

While the applications were being finalised, TEQSA advised us of an additional requirement. They requested a rationale for the intensive mode of delivery of the AIB Master of Business Administration course. The '12-month MBA while you work" was AIB's flagship course and had a large number of graduates, with several thousand current students. The MBA design was unique to AIB as each subject was delivered singly, over a 4-week period inclusive of assessments. It had been delivered in this mode since 2002 and had been re-accredited in 2006 and 2011. Students loved the idea that they could complete an MBA in twelve months while still holding down a job and had to focus only on one subject at a time.

On receipt of TEQSA's request, the Board of Directors asked that internal academics develop a first draft of the response with the final version to be completed in consultation with external experts. This process took longer than anticipated and the report was finally approved by the Board in late October 2015 and the Quality Team submitted the renewal applications to TEQSA on 29 October. Although this marked the end of Major Cycle 3 of the 2014 QA model, the QRC requested that the end date be extended to June 2016 to coincide with the expiry date of AIB's current registrations with TEQSA, with existing and new projects to be ongoing.

As regards Tranche C: Continuous Improvement, its responsibility was transferred to the Quality Team in March 2015 and it was agreed that we would manage the Continuous Improvement Register which would record the results of the cyclical reviews of the Risk Register.

c) **Observation/Reflection and Evaluation stage of the 2014 QA**

There was ongoing observation, reflection on and evaluation of the implementation process in Major Cycles 1 to 3 of the 2014 QA model where regular reports by the

Quality Team were reviewed and discussed by the QRC, Academic Board and Board of Directors. As described earlier in Major Cycle 2, the Board of Directors even brought forward the completion date of Tranches A and B.

Together with my colleagues Professor Angele Cavaye and Dr Ashok Chanda, I presented this 2014 model at a World Congress on Work-Applied Learning for Change which was organised jointly by Global Centre for Work-Applied Learning and Action Learning, Action Research Association Inc. in November 2014. Our presentation was entitled 'Developing and Implementing a QA model for Growing Private Higher Education Institutions' (see **Appendix C**).

A major change was announced in mid-2015, when TEQSA released the 2015 Higher Education Standards Framework (2015 HESF) which would replace the 2011 HESF from 1 January 2017. These standards were structured differently from the 2011 HESF and included some additional sections. The Quality Team undertook a Gap Analysis exercise by mapping the new standards against the old to understand the changes, informed the QRC, Academic Board and Board of Directors of the changes and then developed and implemented a plan to ensure compliance by the due date. These changes required us yet again to review the QA model and its coverage which took us to a third AR cycle, resulting in the 2016 revised QA model.

4.3.3   AR Cycle 3: 2016 Revised QA Model

a)   *Planning stage of the 2016 QA model*
It had been intended that after submission of the renewal applications to TEQSA:
- Tranches A (Re- registration) and B (Re- accreditation) would be 'collapsed';
- Tranche C (Continuous Improvement) would remain; and
- Tranches A and B would be re-activated 2 years prior to the next expiry date of AIB's registration as a NUHEP and the accreditation of AIB's courses, to prepare for the next renewal exercise.

However, in view of the unresolved AIB renewal applications with TEQSA and the requirements of the upcoming 2015 HESF, the Quality Team recommended an amendment to the 2014 QA model. It was proposed that the QA model be revised whereby Tranches A and B would be retained and Continuous Improvement would be incorporated within each of these Tranches, thereby rendering Tranche C redundant. We believed it was important to have an ongoing focus on continuous improvement of

the registration and accreditation requirements. We knew from the experiences of other NUHEPs that some Requests for Further Information could be expected and that it could take some time before we heard from TEQSA about the outcome of our renewal applications.

As a result of our recommendations, the Quality Assurance and Continuous Improvement Plan was approved in May 2016. It comprised two Tranches, with three Major Cycles of six months duration each from July 2016 to December 2017, as shown in **Figure 4.6**:

- Tranche A would focus on Continuous Improvement in the regulations relating to AIB's registration as a NUHEP and all other regulatory requirements such as the ESOS Act (for international students studying in Australia) and relevant legislation in Australia and in jurisdictions where AIB's Teaching Centres were located; and
- Tranche B would focus on Continuous Improvement in the regulations relating to the accreditation of AIB's HE as well as the Vocational Education and Training courses.

Figure 4.6 Continuous Improvement and Quality Assurance Plan
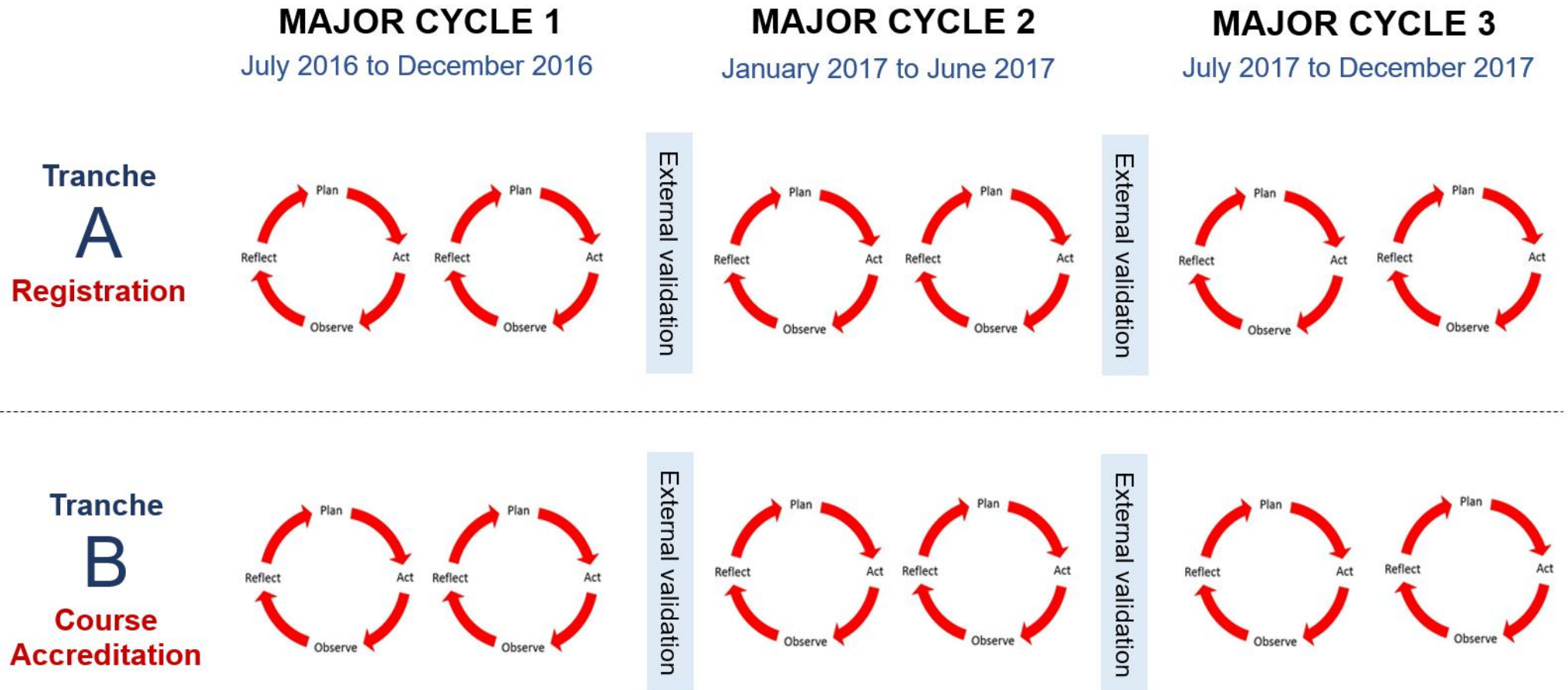
b) *Implementation Stage of the 2016 QA model*

The implementation process of the Major Cycles of the 2016 QA model with respect to Tranches A, B and C is briefly described below, up to the end of Major Cycle 2 in June 2017 when I left AIB:

2016 QA Model Major Cycle 1 –July to December 2016

The major focus of projects in Tranches A and B undertaken in this Major Cycle 1 was the transition to the 2015 HESF since the new standards would be operational on 1 January 2017. Other projects addressed the issues identified by the Quality Team in its Gap Analysis as well as periodic reviews of documentation and processes as part of continuous improvement.

2016 QA Model Major Cycle 2 –January to June 2017

By January 2017 when the 2015 HESF became effective, all major gaps had been addressed and the emphasis of projects became ongoing compliance with the HESF. In addition, the ongoing schedule of internal and external reviews was continued.

c) *Observation/Reflection and Evaluation stage*

Observation, reflection on and evaluation of the implementation process in Major Cycles 1 and 2 of the 2016 QA model continued with regular reporting by the Quality Team to the QRC, Academic Board and Board of Directors.

I recognised at this point my deep commitment to continuous improvement as a quality philosophy and how this had shaped my development of the first two versions of the QA model. In the first one, I had assumed this philosophy was shared and hence explicitly expressed it in the model. This assumption proved to be wrong. In the second version, the model was simplified and the philosophy was implicit in the actions and implementation of the model but again, this process failed when the pressure was on and compliance overrode improvement.

My colleague Suresh Chandran and I presented the 2016 QA model in a paper entitled 'Continuous Improvement and WAL' at the November 2016 conference on Work-Applied Learning for Change organised jointly by Global Centre for Work-Applied Learning and AIB (see **Appendix D**).

Despite the ARAL approach of continually questioning the ongoing improvement and practice of the quality model as it occurred, in writing this chapter, I can see a consistent

thread of thinking amongst others of quality being limited to compliance and control. The fallback position appears to be 'what is the minimum that needs to be achieved in order to prevent any negative repercussions?' However, this is not what quality is to me. I find that most people only see quality from a single and double loop learning perspective. They seek to meet a standard, take corrective action if they are not meeting it and prevent any correction being needed in the future. At no point does the question of whether they are achieving the 'right' quality come into play. I believe that we should ask 'What are we trying to improve and for whom?' The quality model I developed allows for this questioning to occur, while meeting regulatory requirements, but it is also possible for it to be implemented without asking these difficult questions.

My interest in pursuing the answers to these triple loop learning questions was not shared since the Board was focussed on the single and double loop processes that are required by the regulator. My simplification of the QA model over time reflects this pressure as the triple-loop element became more hidden or tacit, rather than explicit in its overt presence. This went against my natural nature to be open and upfront with what I was doing, but I recognised it was the only means by which I was going to achieve the outcomes I wanted at the time. This was perhaps the first time I moved from my epistemological belief that we are all equal in the application of the rules and started to recognise the differentiated power positions at play.

As agreed during the partial sale process, I left AIB in July 2017 after overseeing the re-accreditation process. While my role is no longer held within the business, I understand the QA model is still largely in place.

Chapter 5 Public Work 2 - Transnational Education and Third Party Delivery

5.1 Overview

In the previous Chapter, I reflected on the issues and challenges that resulted in the evolution of a QA model for AIB. In this Chapter, I will take the analysis down a level to look at Transnational Education (TNE) and the AIB Third Party Delivery approach (**Appendix F).** This starts with exploring how the overseas operations came about, the challenges faced in implementing QA mechanisms and how they were addressed, and the single, double and triple loop learning that was achieved. I developed this Public Work in response to a specific request from TEQSA for information about the third-party delivery arrangements through our Teaching Centres (TCs). It was submitted as additional evidence in the AIB application to TEQSA in 2015 for re-registration as a NUHEP. Since all the TCs were located out of Australia, this paper is primarily about our experiences with TNE.

5.2 An overview of TNE

Stella and Bhushan (2011) have compiled several definitions of TNE. They find that the Quality Glossary (Harvey 2014) has a somewhat limited definition of TNE as 'higher education provision that is available in more than one country'. A broader definition of TNE by the Global Alliance for Transnational Education (1997) is:

> any teaching or learning activity in which the students are in a different country (the host country) to that in which the institution providing the education is based (the home country) (Stella and Bhushan 2011:4)

The definition adopted by the Organisation for Economic Cooperation and Development (OECD) in the OECD Guidelines for Quality Provision in Cross-Border Higher Education (2005) appears to be the most comprehensive as it includes various types of TNE and delivery modes:

> cross-border higher education includes higher education that takes place in situations where the teacher, student, programme, institution/provider or course materials cross national jurisdictional borders. Cross-border higher education may include higher education by public/private and not-for-profit/for-profit providers. It encompasses a wide range of modalities, in a continuum from face-to-face (taking various forms such as students travelling abroad and campuses abroad) to distance learning (using a range of technologies and including e-learning) (OECD 2005:9).

Much has also been written about quality assurance in TNE. The OECD Guidelines for Quality Provision in Cross-Border Higher Education (2005) made various recommendations for the stakeholders involved in TNE, namely, governments, HE providers, student bodies

and quality assurance and accreditation bodies. Their main recommendations for HE providers delivering TNE are summarized below:

- To ensure that the programmes they deliver as TNE and in their own country are of comparable quality and consider the cultural and linguistic sensitivities of the receiving country;
- To ensure quality teaching and research by supporting good working conditions and terms of service, collegial governance and academic freedom;
- To develop, maintain or review current internal quality management systems;
- To ensure that the information and guidance provided by their agents are accurate, reliable and easily accessible; and
- To respect the quality assurance and accreditation systems of the receiving country when delivering HE across borders, including distance education. (OECD 2005).

These considerations formed the basis of our approach to TNE quality assurance even prior to the 2013 QA model being applied.

Bosire and Amimo (2017) acknowledge that TNE has provided benefits to the receiving country such as capacity building and increased globalization of knowledge at the local level. However, they assert that the manner in which TNE is provided provokes more debates, interests and questions than clear cut answers about its impact and implications for HE, from a wide range of issues such as its guiding philosophical foundations, management, pedagogy and curriculum design.

Bennett et al. (2010) write about the importance of TNE operations being regulated by the host country as follows:

> …all higher education provided by a country's HEI should be subject to its national regulatory framework, irrespective of where the students actually undertake their study. The same factors that apply to the QA of national higher education should also be applied to the QA of TNE, even though it is being offered in another country (Bennett et al. 2010:30).

They also emphasise that governments have the same obligations towards transnational providers as they do towards national ones. Governments must ensure that both transnational and domestic education are of high and consistent quality and that transparent information is provided. Responsibility for quality assurance of TNE is ultimately national and the final responsibility for the quality and standards of TNE lies within HEIs (Bennett et al. 2010). This position sat well with me and my belief that 'everyone should be treated equally in the eyes of the law', as I interpreted this in my quality role as everyone being expected to meet the same standard.

As one of its major initiatives, TEQSA has developed its International Engagement Strategy (2018b) to promote the role, importance and effectiveness of Australia's quality assurance

and regulatory system. The Strategy acknowledges the need for strong quality assurance of Australian HE to ensure the quality of the student experience and the reputation of the sector as a whole. As students become more mobile, it is important to maintain the quality and equivalence of their overall educational experience, within the diversity of international settings.

AIB's approach to TNE and with the Teaching Centres (TCs) is very much aligned with the importance of quality and ensuring that all participants, whether at TCs or in Australia, have an equivalent learning experience. I realise now that equivalence in learning experience is difficult to achieve as it is effectively an outcome; while equivalence in learning provision is easier to achieve as it is control of inputs and resources. At the time, I assumed that providing equivalent materials, staff with equivalent qualifications and experience and suitable learning environments would result in an equivalent learning experience of equivalent quality.

While it was possible to adjust and fix issues in a single-loop learning approach, and change processes to address the double-loop learning preventative link, the triple-loop learning here related to a deeper cultural understanding that uncovered assumptions and pedagogical histories in our TC host countries that did not prepare students for our 'equivalent learning experience' and hence was not appropriate or 'the right thing' to do. For example, many of our TCs were in countries where the education system was based on rote learning and students had been previously taught to simply learn something and apply it and were generally unable to critique a concept or view.

5.3. The Gibaran/AIB experience with TNE

Readers are reminded that AIB was known as 'Gibaran' until June 2011. Our TNE experience started in 2002 when Gibaran was approached by a college in Singapore for the rights to deliver the Master of Business Administration (Entrepreneurial Management) course in that country. As explained in Chapter 1, with the approval of DEFTE, Gibaran set up a sister company, Entrepreneurship Institute Australia in 2002 which was then registered as a NUHEP to deliver a Bachelor's and a Master's course in Entrepreneurial Management. These courses were delivered offshore by the Singapore college and subsequently by a college in Malaysia.

Rather than Entrepreneurship Institute Australia developing the curricula for the courses it would deliver, Gibaran did so (thereby owning the copyright of all courses) and licensed the use of the courses to the relevant party. In this way, all intellectual property vested with

Gibaran so that it could enter into multiple course licensing arrangements and increase its value. This licensing approach was approved by DEFTE and with my legal background, I worked with our lawyers to draft an appropriate licensing agreement.

Before the first TC in Singapore could be appointed, we had to understand the processes and risks involved. It was an essential part of our quality processes that we should meet not only the Australian requirements but also those of the TC host countries in order that we could operate without any regulatory problems. This process of investigating the regulatory and quality requirements in each TC host country occurred each time a new TC was appointed.

In the case of the Singapore TC, as a first step, I investigated the regulatory environment in Singapore to check whether there were any specific requirements to be satisfied before our courses could be delivered in that country. It was a relief to find the Ministry of Education (MOE) in Singapore did not have a complex approval process. Instead they only required a notification of our intent to appoint the proposed TC and information about the courses that would be delivered. In fact, the TC could start delivering our courses in Singapore immediately after the MOE acknowledged our notification.

In order to maintain consistency of delivery between the TCs and Gibaran, I believed it was necessary for the TCs to adopt, as far as possible, the Gibaran procedures and standards of promoting and delivering the licensed courses. This meant that several documents and processes had to be quickly developed. The first was the agreement between the GLG entity and the TC setting out the terms and conditions of the TC's appointment (TC Agreement). Next was an Operations Handbook setting out the procedures to be followed by the TC in the promotion and delivery of our courses, with numerous supporting forms and checklists including our criteria for the appointment of local facilitators to teach our subjects. We then reviewed the nominated potential facilitators and formally approved those who met our facilitator criteria. This was followed by an induction of the TC administrative staff on the operational requirements and standards. Since this was our first overseas venture, we sent two senior academics to Singapore to deliver the workshops over four months so that the local facilitators could observe and facilitate in a similar manner. Providing 'quality' through guidance felt sufficient at the time. I understand now that I had adopted a quality control methodology. I provided instruction and expected it to be adhered to with the same cultural understanding in which it had been written.

The MOE acknowledged my notification within a few weeks, and we were able to proceed with offering our courses in Singapore soon after the TC and the Entrepreneurship Institute Australia signed the TC agreement.

The first venture in Singapore was a steep learning curve for Gibaran as well as for the TC. We tried to anticipate many of the risks arising from a third party delivering our courses remotely and to develop strategies to mitigate those risks. The TC had to understand and comply with our procedures which they told us were much more rigorous than other institutions whose courses they were also delivering.

Because of market demand from Singapore and Malaysia for additional courses, Gibaran set up two other NUHEPs between 2002 and 2004. These were Tourism Institute Australia, which awarded Bachelor's and Master's degrees in Tourism and Hospitality Management; and Australian Institute of Business Administration, which awarded Bachelor's and Master's degrees in Finance, Marketing, Human Resource Management and Logistics and Supply Chain Management. These two NUHEPs together with Entrepreneurship Institute Australia and Gibaran became known as the Gibaran Learning Group (GLG).

The Singapore and Malaysian colleges referred to earlier were the first of many TCs. Subsequently, TCs were appointed by the GLG entities in various countries including United Kingdom, Ireland, Philippines, Sri Lanka, Trinidad and Tobago, Vietnam, St Lucia, Maldives, Swaziland, Guyana, Egypt, Ghana and Namibia. This growth led to the establishment of the Teaching Centre and Student Support Department at Gibaran to manage and quality control this portfolio.

Each time a GLG entity was incorporated and the courses had been developed, I applied for the courses to be accredited and put onto Gibaran's scope of accredited courses. After that, it was a matter of applying for the GLG entity to be registered as a NUHEP and for the courses to be added onto the GLG entity's scope, after which the licensing agreement would be signed.

As a result of our many experiences with the remote delivery of the courses by the TCs, I felt the need to move from quality control to quality assurance and worked with some colleagues to design a full suite of quality assurance policies and procedures covering the whole life cycle of a TC from the approval stage, the course delivery stage, right through to when the TC arrangement is terminated. These policies and procedures were regularly reviewed and

updated as part of our continuous improvement process as we kept learning from our mistakes or when something went wrong.

I believed that we were implementing a quality improvement strategy regarding TNE as we sought to continually improve but it was nothing more than double loop learning. As an issue arose, we learnt from it and enacted policy and processes to prevent it occurring the next time. We did not stop to consider whether our whole approach to quality, education and equivalence was correct – after all, we were meeting government guidelines and regulations and hence the issue did not arise.

Set out below are some of the challenges we faced with the TCs and how we met them in our double loop learning process. A comprehensive account is provided in **Appendix G.**

a) *Due Diligence process*: For the first few TCs, our due diligence process was relatively weak. We undertook a site visit and focussed on whether the facilities were suitable and the proposed teaching staff had the appropriate qualifications and experience. Over time, our due diligence process became very comprehensive, mainly due to lessons learnt from several challenges that we faced such as:

   - Financial statements: the very first TC experienced severe cashflow problems during the first intake and unknown to us, had been having financial difficulties for some time before it engaged with us. Fortunately, the TC managed to obtain financial support and administered the first intake until completion. To avoid similar problems, we made it compulsory for applicants for TC status to provide us financial statements for the last three years.

   - Commitment of the management team: we quickly realized it was important to ensure that the management team at each TC was professional and committed to providing a quality learning experience for its students. Thus, factors such as senior management having academic qualifications, the potential TC having prior experience in delivering post graduate education and a good reputation became important factors. Equally important were well-maintained teaching facilities, competent administrators and access to appropriately qualified and experienced facilitators. These factors demonstrated to us that the potential TC was serious about the education business and shared AIB's goal of providing the best possible learning experience to students.

b) *Approval of Facilitators*: An important requirement was that all facilitators (a term we preferred to "lecturers" due to the interactive nature of the workshops) should have at least an accredited Master's degree *plus* extensive work experience relevant to the subject(s) they facilitated. We believed that the facilitator should bring the subject alive to the participants and that could only be achieved if the facilitator had actual working experience in that area. The requirement of relevant work experience was very challenging for some TCs, especially in the less developed countries where there was a smaller pool of suitably qualified facilitators. Often, they would nominate a facilitator who had suitable academic qualifications but lacked the work experience component. In such cases, we had no choice but to reject the nominee and wait for the TC to nominate another person who met all the criteria. Inevitably after some time, we had to terminate our relationship with TCs which were consistently unable to meet our standards.

c) *Host country regulatory requirements*: We believed that it was essential to comply with the formal requirements, if any, in a country before commencing TNE so that AIB courses would be recognised or accepted in that country and future students would have a locally valid qualification. However, the formal requirements for approval and continuance of our TNE operations differed from country to country and were not always transparent and led to certain ethical challenges, which I discuss in more detail in Chapter 7.

Over the years, I tried to find out more about the TNE practices of other Australian HEIs to check if we could improve our own practices. As I was unable to find any HEI which would formally benchmark with us regarding TNE delivery, I could only gather this information in a piecemeal fashion from individuals who undertook specific roles in the TNE delivery in their institutions and who I would meet at conferences and other professional gatherings.

It was only in 2016 that AIB was able to engage in a formal benchmarking exercise with another NUHEP about our respective TNE processes. The results of both the benchmarking and our informal investigations into TNE delivery showed that our quality assurance practices were very robust in many respects. For example, other HEIs permitted their overseas partners (the equivalent of our TCs) to enroll students and to set and mark all assessments with minimum oversight or moderation, whereas such matters were handled internally at AIB. We also found that annual audits were undertaken by their own staff whereas our Academic Board insisted that such audits should be undertaken by

independent parties. I felt confident that our processes were at least as good as, if not better than other HEIs.

Re-reading the Public Work has enabled me to appreciate how far AIB has moved in its TNE journey since 2002 and the numerous improvements that have been made in the quality space, albeit in a single and double loop learning level only. It is also satisfying to recognize the major input into the quality assurance processes described in the Public Work that I have made as a practitioner researcher.

However, there is also a realisation that the triple loop learning question of 'quality for whom' was never asked and on reflection, this is probably one of the reasons why Australian providers (including AIB) have closed their TNE operations, or sold out (such as Monash South Africa) and are contracting to the Australian and online markets only. In seeking to deliver equivalence, the assumption was made that equivalence of process would lead to equivalence of outcome. This has not proven to be the case, as shown by the research findings of Lim et al. (2016) which indicate that equivalent student outcomes do not necessarily equate to equivalent learning experiences or teaching workload. Consequently, the quality of learning outcome achieved through TNE partners has been scrutinised and found to be lacking in 'equivalence' and solving the issue is proving very difficult. TNE is largely 'Australian-centric' when addressing the standard of academic quality and integrity (Lim et al. 2016). The context, culture and epistemology of both the students and facilitators differs from country to country, and hence so does the notion of quality and who it is for. Equivalence should not have been the goal – fitness for purpose would have been more appropriate but this would not meet the current Australian regulatory requirements.

Chapter 6   Public Work 3: Selected AIB Quality Assurance Related Policies

6.1. Overview

In this Chapter, I will reflect on three selected policies as a further demonstration of the quality process as it was implemented throughout AIB:

a) Delivery of AIB Courses by Third Parties (**Appendix H**)

b) Assessment of Academic Qualifications Policy (**Appendix I**); and

c) Guidelines for Determining the Equivalence of Professional Experience to Australian Qualifications Framework Levels for Academic Staff (**Appendix J**).

I have chosen these policies as they are examples of the definition of quality assurance I described in Chapter 1, being i) the set of processes, policies or actions performed *internally* within AIB so that provision (input, process and outcomes) fulfils expectations or measures up to threshold minimum requirements; ii) ensures accountability and continuous improvement; and iii) targets *specific* aspects of quality that will be assured.

6.2.   Policy development and update process

I drafted the various iterations of the policies a) and c) and had a major input in developing policy b). I should point out that until I left AIB, I was involved in drafting most of the policies. This responsibility was part of my duties first as the Registrar and then as Executive Director, Quality, especially in view of my legal background. I would present a draft of the policy together with a rationale to the Academic Board or to the Board of Directors depending on which body would have authority on the policy subject matter. The policy would be discussed by the respective Board and either approved in its entirety or amended. In the case of the latter, I would make the required amendments and re-present the policy for approval at the next meeting.

As AIB grew both in student and staff numbers and the ARAL approach was implemented in developing the quality model, the following changes were gradually made in the policy arena to de-centralise the process from myself: a) a policy development and amendment process was introduced whereby individual departments were encouraged to take responsibility for developing or amending policies in their domain- thus, the Academic, Human Resources and IT Departments started developing and updating policies as appropriate, initially in consultation with the Quality Team; b) a Master Register of Policies was established and managed by a dedicated staff member; and c) the staff member would also ensure that any

new or updated policies were reviewed in a timely fashion by the other department heads
This was recognized as vital since a single policy could have different impacts on different departments. Therefore, when a staff member initiates the first draft of a new or amended policy (in the first cycle of the action learning process), it is reviewed by the heads of each department (in the second cycle). The department heads are thus able to ascertain the impact, if any, that the proposed policy would have on the operations of their department and if so, consider whether the policy needs further amendment to avoid any issues for them. It is only after this second cycle is completed that the draft policy (incorporating all amendments) is presented to Academic Board or Board of Directors, as appropriate for approval as cycle three.

6.3 Review of each selected policy

The background and impact of each selected policy and its impact is analysed below.

a) *Delivery of AIB Courses by Third Parties*

In Chapter 5, I reflected on how AIB embarked on TNE through third party delivery of our courses, the problems and challenges we faced and the learning we achieved.

AIB had well-documented procedures in place for the various activities involved in TNE including the initial approach from prospective teaching centres (TCs), the due diligence process for approval of TCs, coaching the TC for delivery, managing and monitoring the delivery process, disciplinary actions and the discontinuance process. These procedures and associated documents and checklists were reviewed and updated on a regular basis or when fresh learning occurred. However, we did not have an over-arching policy which covered our TNE process as we did not think it was necessary.

In September 2013, TEQSA issued a Request for Further Information on our third-party delivery arrangements and we provided evidence of our detailed procedures and associated documents. In June 2014, TEQSA provided a summary of its findings on our response, including a comment that our due diligence process for assessing prospective new TCs was 'not comprehensively codified' and that the information on which we based our decision [to approve a TC] appeared to be 'quite limited and would require further attention'.

This was a surprising conclusion because even though we did not have a policy to 'codify' the due diligence process, the information we used to base our decision on

whether to approve an applicant college as a TC was definitely not 'limited'. To the contrary, it was very comprehensive and in fact many applicants for TC status provided feedback that in their dealings with other TNE partners, they had not been asked to provide much of the information we sought from them and that they were impressed by our thoroughness. Thus, we were not surprised to find from our benchmarking exercise with the NUHEP involved in TNE as mentioned in Chapter 5, that their due diligence process was not as comprehensive as ours.

Nevertheless, I was tasked to develop an appropriate policy on our third-party delivery to fill the gap as identified by TEQSA. As it was meant to cover the whole spectrum of our TC operations, I found it daunting to compress it into a single policy. Finally, I decided the logical approach would be for the policy to reflect the life cycle of a TC and so I divided the policy into four sections: Selection of Teaching Centres; Managing the Course Delivery by Teaching Centres; Monitoring and Review; and Discontinuance and Teaching Out. The main supporting procedures for these various phases were listed at the end of the policy and included a flowchart of the processes from the TC Application to Approval; New TC preparation for delivery of AIB courses; Approval of TC promotional materials; Student Applications Vetting Process; and Facilitator Approval. The policy entitled "Offshore Delivery of AIB Courses" (**Appendix Hv1**) was approved by Academic Board on 27 May 2015. This was cycle one of the development process. To a degree, it was completed in a hurry given the TEQSA imperative, and the consultation process was thin as it was more about documenting current practice than trying to change it.

However, I soon noted that the policy title of "Offshore Delivery of AIB Courses" did not align with its subject matter which was about the third-party delivery of AIB courses. When I pointed out this misalignment to Academic Board, I was asked to submit a revised version of the policy at the next Academic Board meeting in August. I took this opportunity to consult with my colleague, the Quality and Compliance Manager and we identified additional areas in which the policy could be improved. These included explicit mentioning that there was a 'due diligence process' in the selection of TCs; that an induction process for TCs was conducted prior to their commencement of operations as a TC; and a bigger list of the detailed supporting procedures which covered the whole TNE process. The reason for these changes was to demonstrate the thoroughness of the quality assurance of AIB's TNE through third party delivery. A more robust second version of the policy which was re-named "Delivery of AIB Courses by Third Parties" was approved on 28 August 2015 (see **Appendix Hv2**).

Versions three and four of this policy were approved by Academic Board on 7 October 2016 and 4 November 2016 respectively (**Appendices Hv3 and Hv4)**. The main changes enacted were the additions of a procedure on 'Teaching Out a Course at a TC"; the provision of regular updates to both Academic Board and the Board of Directors on any termination of TCs; and the teach-out arrangements for the current students at the relevant TC. In fact, the Standard Operating Procedure for teaching out a course at a TC had been well-documented and improved upon over the previous years and regular updates on the teaching out status and the affected students were regularly provided to both Academic Board and the Board of Directors, but these processes had not been specifically mentioned in the earlier versions of the policy.

On reflection, I accept that I had a blind spot here between documentation and practice. Clearly there was a need for an overarching policy for the third-party delivery of AIB courses. While AIB has an impressive list of processes, checklists and documentation in place, an 'umbrella' policy completes the picture by setting the context, linking all the processes and thus quality assures. Although TEQSA had been wrong in concluding that our due diligence process was limited, they were correct in requiring a codifying policy to lift us from quality control to quality assurance.

The final move to quality improvement did not occur with regards to this policy as the practice of TNE delivery through TCs has been discontinued and teach-out has been completed recently.

b) *Assessment of Academic Qualifications Policy*

This was one of the very few policies where I did not write the first draft. The necessity for this policy was raised in 2013 by the then Director of Learning and Teaching who produced a first draft for my review and input. He had undertaken his PhD on academic fraud – the falsification of academic qualifications for employment and study- and was keen to ensure that AIB had the appropriate policy and procedures in place to prevent such academic fraud from happening.

Over the previous years, we had indeed detected a few applicants for study and employment who had presented fraudulent qualifications and had rejected those applicants, even without an official policy in place. However, I agreed that it would be a better approach to have an appropriate policy in case of a challenge by any such applicant who was aggrieved by their rejection. This in effect was cycle one: we noticed an issue and we addressed it. It was our single loop learning. The first version

of this policy was effective from 1 November 2013 (**Appendix Iv1**). It was therefore cycle two: preventing such issues arising again and having a mechanism to deal with them consistently and was our double loop learning.

The second version of the policy resulted from the third cycle of review and was introduced on 8 April 2016 (**Appendix Iv2**). It is more concise and is an example of how policies evolve over time. My colleagues in the Admissions Department and I found that the processes for the detection of fraudulent qualifications were the same, whether they were applicants for study or employment including TC facilitators or people in senior management positions at TCs. It was logical therefore to condense the separate sections in the first version of the policy for "Prospective Students", "Prospective AIB Staff (Including Facilitators)" and "Prospective TC Facilitators and High Managerial Agents" into one single section which covered all three categories of applicants. This second version also reflected the transfer of responsibility for admissions from the Senior Admissions Coordinator to the Admissions Manager. It was also more comprehensive as it included as 'Related Policies' all policies related to international students, the grievance policy, refund policy and the Delivery of AIB Courses by Third Parties described in section a) above. This linking of policies and areas previously considered separate into one single quality approach as part of the application of the quality model may seem obvious now, but at the time it was a revelation. This was the point when we stopped considering policies and actions in silos and started seeing quality as an organisational endeavour.

c) ***Guidelines for Determining the Equivalence of Professional Experience to Australian Qualifications Framework Levels for Academic Staff***

I drafted this policy (internally known as the 'AQF+1 policy') to comply with the 2011 HESF Standards, specifically Provider Course Accreditation (PAC) Standard 4.2 which states:

> The higher education provider ensures that staff who teach students in the course of study:
> - are appropriately qualified in the relevant discipline for their level of teaching (qualified to at least one AQF qualification level higher than the course of study being taught or with equivalent professional experience);
> - in the case of supervision of students in a course of study that leads to a Doctoral Degree (Professional) award located at level 10 of the AQF, are qualified at level 10 of the AQF or have equivalent professional experience;
> - in the case of supervision of students in a course of study that leads to a Doctoral Degree (Research) award located at level 10 of the AQF, are qualified at Doctoral Degree (Research) level or have equivalent research experience.

There are 10 AQF levels but AIB's courses range only from the Diploma of Management (AQF level 5) to the Doctor of Philosophy and Doctor of Business Administration (both at AQF level 10).

The requirements of the second and third dot points of PAC Standard 4.2 regarding the supervision of doctoral students are adequately covered in AIB's Research Degree Administration Policy and Procedure which requires that all staff who supervise AQF level 10 Doctoral students at AIB must have research Doctoral qualifications and relevant supervision experience. Therefore, I had to draft an appropriate policy which complied with the first dot point of PAC Standard 4.2, whereby faculty teaching at AQF Levels 5 to 9 must have 'at least one AQF qualification level higher than the course of study being taught or …. equivalent professional experience'.

As explained in Chapter 5, AIB's minimum requirements for a facilitator teaching at Master's level or lower is an accredited relevant Master's qualification *plus* work experience that is relevant to the subject being taught. Most of our facilitators, both domestic and at TCs had AQF Level 9 Master's qualifications and thus, according to PAC Standard 4.2, they were appropriately qualified to teach at AQF Level 8 and below. However, they could not teach at AQF Level 9 (Master's) unless they had one AQF qualification level higher in the relevant discipline, that is, an AQF Level 10 Doctoral qualification <u>or</u> they had *equivalent professional experience* (my emphasis).

The question we had to resolve was what is the professional experience that would be considered as being equivalent to an AQF Level 10 Doctoral qualification? At that time, most HE providers were still grappling with this policy and there were very few published policies available for review. Using such policies as guidance, I sought advice from the AIB Academic Director and developed a draft policy. It stipulated that to teach an AQF Level 9 Master's course, a candidate must have formal qualifications which are at least at the same level <u>and</u> have significant professional experience. Section 1.3 of the policy sets out the types of evidence that would be accepted as significant professional experience, such as seniority of roles in the field of study including managerial positions held for at least 5 of the last 10 years; experience in managing significant projects; demonstrated expertise in the field of study; or peer-reviewed publications. The evidence was focussed on the length of time in post or visibly public outcomes. This was cycle 1 of the policy development process-formulating a solution based on others' current practice. **Appendix Jv1** is version one of the policy and was effective from 27 May 2015.

At my request, the administrative staff responsible for managing the approvals of facilitators at AIB undertook a thorough review of the academic qualifications and work experience of all facilitators, both domestic and at TCs and cross-checked their work experience against the categories of 'significant professional experience' set out in section 1.3 of the policy. Any facilitators who did not satisfy these more specific requirements were then removed from the list of approved facilitators and they and their TCs (where applicable) were advised accordingly. Less than 10 of the nearly 300 facilitators, both domestic and at TCs were disqualified under this policy, with the main reason being that their managerial work experience was no longer within the last 10 years.

I soon recognised that this policy needed revisions for further clarity. This became cycle 2 of the process. By this time, TEQSA had published a Guidance Note and there more examples of similar policies available for review, but these tended to prescribe less categories of evidence acceptable as 'significant professional experience' than the first examples. I consulted again with the Academic Director and drafted a second version of the policy, which was approved on 12 August 2015. It is provided as **Appendix Jv2.** This version was more specific in certain respects such as the minimum requirements for teaching AQF level 8 and 9 courses: academic staff must have a qualification at least one AQF level higher; if they have the same AQF level qualification as the course being taught, they should have at least 5 years relevant professional experience in the last 10 years *or* enrolment in a relevant doctoral program plus relevant professional experience together totaling at least 5 years.

Section 1.13 gave the Academic Director discretion to assess broader skills or qualifications such as research and/or creative work/projects at an advanced level; publications, presentations and conference participation; experience outside tertiary education in industry, business or government employment; and leadership in local, state or national advisory bodies and/or community organisations.

The issue then became one of monitoring that the facilitators continue to satisfy the 'significant professional experience' requirements of the AQF+1 policy and thereby continue to be compliant with PAC Standard 4.2. The facilitators provide annual reports of their professional development activities. In addition, AIB set up Communities of Practice, but these sessions have been poorly attended. It was this issue of ensuring currency of knowledge that we were struggling with when I left AIB.

I can see on reflection that the issue under consideration was not simply a matter of length of the professional experience of the facilitators, but the impact of such professional experience upon their practice. It is about achieving a deeper insight through reflection and action and being able to impact upon the work you are engaged with, rather than simply being awarded as a long service medal.

Chapter 7   Critical Review and Personal Reflections

7.1   Overview

This doctorate has provided me with the opportunity to reflect critically on my professional practice as a quality assurance practitioner and how I developed into that role. In this chapter, I discuss how I dealt with the challenges that I faced in various contexts and also reflect on my learning in the contexts of systems thinking, change agency and leadership.

7.2   Ethical issues, dilemmas and concerns

It is important to me that I am ethical in my practice as a quality assurance practitioner. I have come to realise that my default position of doing the right thing has been influenced greatly by my upbringing as well as my legal background. In the following section, I provide some examples of the challenges of working in a family run business; with the overseas regulators and with Teaching Centres, how they were addressed and how they impacted on my practice.

a) Challenges of working in the family business

AIB was a family-owned and managed organisation until its partial sale in April 2015. Before the partial sale, family members played multiple roles in the business. My husband Selva and I were on the Board of Directors together with three independent members, with Selva as the Chairman of the Board while I was a Director and Company Secretary. I was also the Executive Director, Quality. My two sons had been working for AIB for several years before they were appointed Joint CEOs in 2013.

After the partial sale in 2015, the then Board of Directors (including Selva and myself) stepped down and a new Board was appointed, comprising three Abraham representatives and three representatives of the new shareholder. The Abraham representatives were my sons and an independent member. I continued in my role as Executive Director, Quality until I left AIB in June 2017, while my sons continued as Joint CEOs. Thus, all through the period of the development of my Public Works, the family members had senior management roles.

Working with family members is often challenging and indeed, the issues and conflicts in family businesses have been the subject of much research (for example, Harland 2015; Levinson 1971; McKee et al. 2014; Tuttle 2018).

I have had no major issues working with Selva over the last 25 years. As we come from different academic backgrounds (mine being legal, Selva's being management), we have always had clear lines of accountability and respect for each other's expertise. We also have an open approach to discussing issues we are facing with each other. As a result, I have had no problem asserting my own professional identity and in fact Selva has always encouraged me to develop professionally, for example by undertaking this doctoral study. Perhaps we have been fortunate in that we have had no major areas of conflict to contend with and hence the juxtaposition of the marital relationship with the work relationship has never been tested.

However, there have been certain ethical issues and concerns that I have encountered in the family-run business, such as the following.

When we employed my sons at AIB, Selva and I were aware that the existing staff may regard this as nepotism and wonder if they were appointed merely because they were family and whether they would be given preferential treatment over other employees (Bork 2012; Chris 2015). While they were initially appointed because they were family, each one brought much needed skills and knowledge to AIB. One son took charge of Marketing from Selva and the other took over Operations from me. They worked very hard at their respective portfolios as they realised that their efforts were contributing to the growth of the family business and to their eventual benefit. Selva and I were careful to ensure that they did not receive any preferential treatment and that their salaries and benefits were similar to other employees at a similar level of seniority. I would acknowledge, however, that they had preferential treatment regarding promotion opportunities when they were promoted to Joint CEOs since the positions were not open to others, but that was only after more than six years of consistent and high-level performance.

There was a certain amount of tension between the aging founders (Selva and me) and my sons due to their 'trans-generational involvement' (McKee et al. 2014) as they wanted to implement new ideas and needed a clear delineation of roles and responsibilities. Also, there were frequent disagreements between my sons because of their respective portfolios of Marketing and Operations. At AIB, the focus of Marketing was growing the business with a bigger student base and more market share whereas Operations was concerned with various aspects of the 'back-end' of providing a quality service to the students. It is not unusual for the Marketing and Operations departments in organisations to often find themselves at odds with one another because of

differences in objectives and expertise (Bagatsing 2015). However, the situation here was made more complicated because of their familial relationship.

Selva and I wanted to ensure that the work tensions between the family members did not jeopardise the familial relationship. As a result of many in-depth discussions, all the family members agreed that while it was important to build AIB as a quality provider of HE, it was more important to ensure that our close family relationship was intact. We recognised the need to manage the areas of conflict as best as possible and engaged a family coach to guide us. His brief was to help us to better understand the areas and causes of conflict in the family run business and how to mitigate them.

The family coach, who had a psychology background, met with each us separately in order to obtain our individual viewpoints and helped us to understand each other better as well as the causes of conflict. We also realised that that not all conflicts are bad and that organisations can actually benefit from such conflicts by improving decision-making and focussing on alternatives about what the organisation should do and how (Jehn 1995, 1997 cited in McKee et al. 2014). That certainly was the case at AIB since each of us had different perspectives on any particular issue and we were able to look at a given issue from different viewpoints before arriving at a decision.

We agreed to make a conscious effort to understand each other's viewpoints, to communicate in a professional manner and to respect each other's role and responsibilities in the organisation. We also agreed not to discuss work at home so that we could focus on family time out of work, and professional matters in the workplace. Gradually, our working relationships improved as a result of these efforts.

I realise now my self-reflections on the challenges of working with family were limited to my single loop learning as I felt I could not change the systemic process of how we related to each other. Double-loop learning occurred when I sought the reflections of the other family members to gain multiple perspectives on our relationships. The deeper question of whether we want to work together and if so, how do we all change in order to make that happen, was the triple loop learning that took us to the family coach.

As a quality assurance practitioner, I can now look back and question the extent to which I was able to act truly independently in my role in the family-run business. I realise that Selva and my sons did not interfere in my role as they respected the work

that I did and my knowledge and experience. My learning here is primarily around the difficulty in managing the emotional context of family relationships in the workplace.

b) Ethical issues with external bodies

As described in Chapter 5, our TNE operations comprised third party delivery through Teaching Centres (TCs). At one time or another, the TCs were based in Singapore, Malaysia, Sri Lanka, United Kingdom, Ireland, Trinidad & Tobago, Guyana, Vietnam, Philippines, Maldives, St Lucia, Egypt, Swaziland, Ghana and Namibia.

The pre-TEQSA Australian regulatory requirement regarding third party arrangements and TNE clearly stated that HEIs are subject to *overseas* regulatory requirements related to their offshore activities (National Protocols for Higher Education Approval Processes 2007, s.5.7). However, neither the 2011 HESF and its successor, the 2015 HESF which are regulated by TEQSA had any similar provision. As a result, we had an ethical challenge regarding the correct protocol for dealing with overseas regulatory requirements.

This was not an issue where the host country in which a potential TC was located had specific requirements for the accreditation or recognition of our courses, as we were legally required to comply before we could offer our courses in that country. However, the situation was not so clear where a host country did not have any formal requirements for our TC to commence delivery of our courses there.

We nevertheless decided to formally advise the relevant authority of our intentions. We did this because we wanted to ensure that our courses would be recognised or accepted in that country and that our graduates there would have locally valid qualifications to boost their employability. In my view, it would be extremely unethical practice to obtain fees from students and provide them an education, knowing that the degrees they received from us were not recognised in their country. In fact, the AIB website proudly states that our degrees are fully accredited in Australia and 'recognised by a number of international government departments, agencies and registries' https://www.aib.edu.au/study-with-us/why-study-with-us/.

The formal requirements for approval and continuance of our TNE operations differed from country to country and were not always transparent. When we commenced TNE delivery in the early 2000s, a notification to the relevant authority of our intention to deliver our courses was sufficient in countries such as Sri Lanka, Singapore, Vietnam

and the Philippines. At the other end of the spectrum, in Trinidad and Tobago, we underwent a formal application process to the Accreditation Council of Trinidad and Tobago before we could be approved to deliver our TNE there. In addition, we had to submit to the Accreditation Council a very detailed Annual Report for each TC in that country. In the middle of the spectrum were varying levels of requirements.

These varied regulatory contexts were ethically challenging for me as I was used to the Australian standards. However, I learnt to accept the situation pragmatically since there was no other option. Nevertheless, as a risk management strategy, I instituted a process whereby a colleague from the International Marketing Department would review, on a six-monthly basis, the regulatory requirements in each country where TCs were located to check if there were any changes that would require AIB to apply for formal accreditation or recognition of our courses. The findings of this regular review (see an example in **Appendix K**) were duly reported to the QRC and it was noted that there were no changes in any of the regulatory requirements. This process gave me confidence that I was doing all that was possible as a professional quality practitioner.

Another area of ethical concern was the response of the Irish immigration authorities to the issue of unsatisfactory academic performance by student visa holders. In Australia, if a student visa holder does not achieve satisfactory course progress and fails to comply with minimum attendance levels, their education provider (whether in HE or vocational education) is required to report this to the immigration authorities. As a result, the visa will be cancelled in accordance with the National Code of Practice for Providers of Education and Training to Overseas Students (2018).

I found the situation to be very different in Ireland. The majority of students studying our courses at a TC in Dublin were on student visas. Many of them used the student visas as the means to remain in the country and work, resulting in poor attendance rates at lectures and very low pass rates. This situation did not improve despite several warnings to the students given in accordance with our academic policies. When we advised the Irish immigration authorities of this problem, they did not cancel the student visas of the relevant students, as would have been done in Australia in similar circumstances. Instead, those students were allowed to remain in the country, without any repercussion.

We had the ethical dilemma of upholding Australian standards overseas, in the face of a contrary immigration practice in situ. It was against our academic policy to allow the

poorly performing students to continue with their studies. Also, doing so would be unethical, since that would give them preferential treatment compared to students with similar results at other locations. Therefore, we terminated the enrolments of those students on the grounds of inadequate academic performance and faced many complaints from the students and the TC. As the academic performance of the students at this TC continued to decline despite more warnings, we had no choice but to terminate the arrangement with the TC and teach-out the remaining students. We were not prepared to condone a situation where students fail due to deliberately missing lectures and/or examinations.

This experience made me revisit our due diligence process to check if we had missed any obvious clues about the TC, and how we could ensure that a similar situation would not re-occur. I soon realised that we had undertaken all possible searches and inquiries prior to engaging with this TC and the situation was directly caused by the poorly performing students. They were not interested in their studies and had enrolled only because they would be issued a student visa and thereby have a valid reason to live and work in Ireland for the duration of the visa. As it is very unusual that students would pay fees but not attend lectures or sit examinations, I accepted this experience as a single-loop learning since I had to learn to adapt to the situation.

c) **Ethical issues with Teaching Centres**

We had clear policies and processes for TNE that we expected our TCs to comply with. We monitored the TCs closely to ensure strict compliance with our policies and processes since any continued non-compliance could affect the learning experience of the students as well as damage our reputation. An additional important consideration in our TNE operations was that NUHEPs were required to manage and quality control all aspects of delivery by third parties (HESF 2011, Provider Registration Standard 4.5). This requirement was made more explicit in the HESF 2015 (section 5.4.2) where the NUHEP remains accountable for the course of study and verifies continuing compliance of the course of study with the standards in the HESF.

We did discover some cases of unethical behaviour by certain TCs. These included leaking question papers in advance of the examinations, giving students additional time for the examinations and engaging unapproved facilitators who invariably would not have met the minimum criteria for facilitators as set by AIB. While the first two types of incidents relating to examinations gave an unfair advantage to the students, the use of unapproved facilitators meant that the students would be disadvantaged if the

unapproved facilitator did not, in fact, have the necessary academic qualifications and work experience to facilitate the subject in question.

AIB could not allow such unethical behaviours to continue as they were not only in breach of our policies and processes, but also of our obligations under the 2011 and 2015 HESF to quality assure all aspects of third-party delivery.

In the case of the examination breaches, our response was to engage independent invigilators for all examinations to ensure that the examinations were conducted in a professional manner and to safeguard the integrity of the question papers and strict adherence to the time limits. This process was then implemented across all TCs as a quality assurance mechanism.

Where an unapproved facilitator did not meet the minimum criteria for facilitators, we would arrange with the TC for extra tutorials to be delivered for that subject by an approved facilitator, to compensate for the earlier use of the unapproved facilitator. If we discovered a further instance where an unapproved facilitator had been engaged by that TC, we would suspend the student enrolments at the TC for a specified period as a penalty. This penalty usually worked as it had a negative financial impact on the TC. If further breaches occurred after the suspension of student enrolments was lifted, then we would terminate the arrangement with the TC and transfer the remaining students to another TC or do a teach-out. Such decisions were arrived at only as a last resort because of their impact on all parties concerned; but were nevertheless taken because upholding quality standards was an ethical matter for AIB.

While the situations described above may seem relatively simple dilemmas, the complexity of working through these issues was not. The cost of entering teach out, for example was large, and the already strained relationships with TCs became almost impossible to manage. In addition, we had to advise TEQSA of the circumstances each time we closed a TC.

On reflection, it is obvious to me now that a clear alignment of values between AIB and the TCs was the key factor to selecting who to partner with. This again takes us back to the 'quality for whom' question underpinning the triple loop learning. Only by having detailed discussions with potential TCs could we ascertain whether they would be a good fit, while the single and double loop questions were easy to resolve in terms of what processes they had and how they could make them work for us.

7.3   My learning in the contexts of systems thinking, change agency and leadership

This section outlines how my learning has been conceptualised and applied throughout this Context Statement in the contexts of systems thinking, change agency and leadership, and the impact on my practice. The circular nature of these contexts could allow for these to be taken in any order, but this sequence best reflects my learning, realisation and development.

a) **Systems thinking**

I realise that systems thinking and the loops of learning were relevant to my practice in the development of the QA model. As described in Chapter 2, when the new regulatory framework (2011 HESF) was introduced, I reviewed the pre-2011 QA model of AIB to ascertain whether it would be compliant with the new framework.

The QA model was in effect a system as it was a 'set of people, regulations, machinery, and other elements that work together to form a process' (Crookes, 2007:1). My subconscious systems thinking mindset enabled me to review the 2011 HESF as a whole and in the context of AIB and the changing external environment, in order to better understand their interrelatedness (Senge, 1990). Upon realising that the pre-2011 QA model would not comply with the 2011 HESF, I developed the 2013 QA model, which later evolved into the 2014 and 2016 versions as described in Chapter 4.

Williams and van't Hof (2014) identify three core concepts for an approach to thinking systematically: inter-relationships (how do things connect with each other?); perspectives (what are the different ways a situation can be understood?); and boundaries (what's in and what's out?). Hummelbrunner and Reynolds (2013) have developed a conceptual framework that connects these three core systems concepts with single, double and triple-loop learning, summarised as follows:

- in single-loop learning, the focus is on *interrelationships* between the intervention and its effects, but also within them. Where there is a divergence from original plans, adaptive recommendations could include modifying a strategy or activities to better achieve stated aims and objectives, but the purpose of the intervention is not questioned.
- in double-loop learning, multiple *perspectives* are considered when reflecting on assumptions underpinning an intervention. By acknowledging that a situation can be framed in different ways, the purpose and goals of an intervention are also questioned.

- in triple-loop learning*,* the focus is on the *boundaries* made with any intervention and its evaluation. This notably involves looking at the power relations that determine such boundaries.

In reviewing this conceptual framework, it is clear that the process of development of the QA model at AIB used a systems approach and resulted in single-loop, double-loop and triple-loop learning at different levels. While the new QA model was being developed, the pre-2011 QA model still had to be applied as a short-term measure. During this period, existing processes continued to be used and improved upon without a change in strategy, thus resulting in single-loop learning for the team. With the new QA model, the team which was involved in the ARAL cycles learnt to probe and question the underlying causes of problems and develop mid to long-term solutions to such problems, resulting in double-loop learning.

Systems thinking has contributed to my triple-loop learning. Bateson (1973:250) defined Learning III as `a corrective change in the system of *sets* of alternatives from which choice is made'. This adds a systemic approach to the notion of triple-loop learning discussed in Chapter 3 and the notion of choices, which could also be taken to refer to an ethical or moral element to contemplating how the system is working. While some authors believe Bateson's Learning III differs considerably from the more reflexive, deeper questioning conceptualisations, the introduction of choices in the process arguably embeds it in deeper questioning conceptualisations. As such, it applies equally to my application of triple-loop learning, as I was applying my deeper questioning of the choice of 'quality for whom' to a systemic process, where the system is largely determined by legislative bodies.

My observations on the relationship between systems thinking and the loops of learning are as follows:
- In order to really challenge and critically review a system, the question of who the system is benefitting needs to be revisited at every point, as this focus can be skewed if a system starts to support itself, and the hierarchy of players within it, rather than the outcome it is seeking to achieve. This allows triple-loop learning to occur within a system.
- Critical review of a system requires each element to be reviewed individually as well as in the context of the system, to ensure that it is robust in preventing problems occurring (double–loop learning occurs through this).

- The mechanisms of how a system works in practice can still fall over due to human nature, intervention and error, and hence there is still a need for single-loop learning to keep a system functional at all times.

- The power inequalities that exist amongst stakeholders in a system, as identified by Flood and Romm (1996) can impact the ability for double- and triple-loop learning to occur as dominant behavior can skew the outcome in favor of one party over another.

- There is a critical role for leadership, for someone to ensure that a system is self-reviewing and adapting to continue to meet the needs it was designed for. This prevents a system from becoming obsolete. While this may not always be seen as a leadership role per se, the reality is that ensuring a system adapts to its environment is leadership. To this end, quality assurance managers around the world may fail to be recognized as leaders, and seen more as gate-keepers, but one who engages in all levels of learning will be a leader.

b) Change Agency

The development of the QA model for AIB (my Public Work 1) was a major change initiative as it involved developing and testing a new process of quality assurance for the organisation.

Due to my role in the organisation as Executive Director, Quality, I was the *internal change agent* who had the carriage of this change project, noting that a change agent is 'anyone who has the skill and power to stimulate, facilitate, and coordinate organisational change effort …[and] may be either external or internal' (Lunenburg, 2010).The importance of change agents or 'champions' (technically knowledgeable individuals who use their personal attributes and influence to drive participation in learning processes) has been highlighted by Johannessen et al. (2019) as one of the three principles for supporting triple-loop learning, the other two principles being a governance structure to support the learning processes and the continuous adaptation of such learning processes.

I can relate to the five steps to be a successful change agent as described by Grandison (2018), since that was how I proceeded with this change initiative:

1. *Embrace the resistance*- When I experienced resistance to my first version of the QA model, I accepted it and developed a simpler second version in accordance with the wishes of the Board and senior management.

2. This process could be categorised as *co-creating a vision* of the desired end-result.
3. With the second version of the QA model, I got *buy-in* from the most senior people in the organisation, namely the Joint CEOs.
4. I created *a track record* of the progress of the change project and gave the Board and management regular updates and in that way, maintained their support as they could see tangible progress.
5. I made the *change normal* by embedding the change in AIB through encouraging department heads in particular to think about how to continuously improve their operations.

This experience as an internal change agent has helped me to develop in many ways. I have learnt the importance of communicating the change process to the stakeholders, listening to feedback and reflecting on developments, all of which are categorised as *dialogue* by Lawrence (2015). I also learnt how to cope with resistance to change and develop alternative approaches, to understand some of the reasons for the resistance and to work with colleagues with views and approaches very different from mine.

Any change process will force those affected to think more critically and hopefully re-evaluate their existing behaviour and ways of doing things. Since most people become set in their ways after some time, this may be extremely difficult (and near impossible) for some (Grandison 2018). This is particularly true when engaging in a triple-loop learning process, as the deep question of why you are doing things, and the challenging of business practices, can be threatening to those not immediately involved in the process, as well as confronting to those who are involved. The ARAL method of cycles can help reassure people that continual review is occurring and hence nothing is set in stone, and everything can be adjusted to make it work.

AIB and the staff have benefited from this change initiative. AIB has a robust QA model that is flexible and can be easily updated to cope with regulatory changes Senior staff who worked with me on the project have also learnt about the cyclical process of the ARAL approach, through individual and team learning and how it can be used for continuous improvement.

Single-loop learning occurred when my team and I sought better ways to deliver an existing service, while double-loop learning occurred when 'thinking outside the box' (Hummelbrunner, 2015:19) by reflecting on whether certain norms, processes and

policies should be changed to achieve our goal of a robust QA model. On a personal level, I was interested in AIB being more innovative and creative so that it could be more successful in the marketplace. This involved examining its core values and identity, namely, triple-loop learning (Britton, 2005).

By sharing each version of the QA model at conferences, I have publicised the model which can be adapted by other NUHEPs and customised for other industry sectors. In this way, I hope the model stimulates broader triple-loop learning within the sector and consolidates my position as a leader in the field.

In summary the following are contributions to change agency that I make in this Context Statement:

- The ARAL method is an inclusive change management process involving individual learning (single-loop), team learning (double-loop) and organisational learning (triple loop-learning).
- The ARAL method being cyclical in nature can help embed the change management process as each element is continually revisited and revised for improvement so people do not feel it has been 'done' to them or is a 'permanent, non-improvable' outcome.
- Effective change agency is an important element of organisational learning.

c) Leadership

My role as a leader evolved over time. In my first job at the bank in Singapore, I was a departmental manager, where I learnt how to get my team to work towards the achievement of the bank's goals. My leadership role at AIB was as head of the quality portfolio from 1995 when it became a NUHEP, until I left in 2017. During those 22 years, I had significant responsibility to maintain all aspects of the quality standards, with the knowledge that any breaches might have serious consequences for AIB's image as well as its on-going accreditation. I acquired significant experience in the quality aspects of private higher education. I successfully led my colleagues during five accreditation and re-accreditation exercises for AIB and also led the (ultimately unsuccessful) application for university status in 2009. While each exercise became progressively more rigorous, it also provided me with important lessons on how to improve. As explained earlier, my job required me to also lead the project for the development of the QA model for AIB, and act as a change agent.

Argyris & Schon's (1978) notion of deutero-learning focusses on a reflexive process that enables people to be able to undertake single and double-loop learning, and it is also argued by some to be a form of triple loop learning (see, for example, Flood and Romm, 1996). Such a reflexive process was certainly a factor that shaped my role in leading the quality change process as a thinking partner, which Hargrove (2008, cited in Davis, 2012) believes may be the most appropriate role a leader can play. He distinguishes between 'incremental learning' (single-loop), 'reframing' (double-loop) and 'transformational learning' (triple-loop) as important distinctions for group leaders seeking to not only empower people to achieve more, but to transform who they take themselves to be. This is exemplified in my shift from legal systems thinking to a broader change agent role.

Initially as a leader, I brought my legal systems thinking to an education quality role. I saw problems and I fixed them according to custom and practice; employing single-loop learning. As the quality process emerged, the custom and practice were questioned, and I found myself challenging some of my systems thinking and stepped outside the box of my legal perspective that the rules apply equally to everyone. This was the development of my double-loop learning which I then applied further to the development of the QA model in Public Work 1.

It was important for me to embed the QA model in AIB in order to provide a robust quality framework that would be flexible enough to sustain changes in the external environment, both regulatory and otherwise and cope in a disruptive business landscape (Mercer, 2019). It was essential that the model be accepted and owned by AIB staff and to ensure everyone was on the same page to achieve the organisational vision through a collaborative culture. As a leader. I had to encourage the staff to think out of their boxes and come up with ideas that would not emerge otherwise and allow them to take ownership of their work. I also had to accept that some of my ideas had to change in order to accommodate theirs.

Salakas (2017) believes that if leaders genuinely want to make a real change, especially change that is scalable and not just one-off, but inclusive of a whole team, department, or entire school they need to have people involved in the third loop of learning right from the outset. In this loop, people understand the big picture and they have an authentic awareness of what is being changed, how it benefits them and what are the associated benefits to the larger group. In this context, triple-loop learning could be said to have occurred not only with me as the leader but also among the staff

involved in the ARAL cycles when they began to understand how the QA model could benefit AIB.

The contribution to leadership I make in this Context Statement can be summarised as follows:

- Leadership without a change outcome is not leadership; it is management of a current process. Leadership involves challenging and disrupting the status quo.
- Leadership therefore involves the leader in a personal process of single, double and triple loop learning, questioning their own purpose and the extent to which this is influencing the organisation.
- In realising their own purpose, a leader needs to be able to let go of their bias if the organisation's triple-loop learning results in the organisation taking an unexpected path. Leaders need to traverse this path rather than dictate the path they prefer, or else organisational change and learning will not occur.

d) Impact on my practice

Systems thinking has enabled me to see interrelationships with the other disciplines identified by Senge (1990) to inform a coherent body of practice as follows:

- *personal mastery* - being single and double-loop learning within job roles;
- *managing mental models* - involving the contextualising of individual learning in organisational triple-loop learning;
- *building a shared vision* through the ARAL change agency process; and
- *team learning* being driven by my leadership role.

I have reflected on the interrelationships between the core systems concepts developed by Williams and van't Hof (2014), change agency and leadership, and how they have impacted on my practice and present my findings in **Table 7.1.**

Table 7.1: Impact of systems thinking, change agency and leadership to my practice

Core systems concepts	Loops of learning	As related to my practice
Interrelationships between the intervention and its effects, but also within them. Where there is a divergence from original plans, adaptive recommendations are made; for example, modifying a strategy or activities to better achieve stated aims and objectives. However, the purpose of the intervention is not questioned.	Single-loop learning- (*Learning to adapt*): • results in a change of strategy or tactics without questioning the underlying goals or assumptions. • helps to control individual behaviour within existing decision-making protocols; • provides short-term solutions to implementation problems and deals with symptoms more than root causes.	Impact of systems thinking The introduction of the 2011 HESF ('the intervention') made me realise that the pre-2011 QA model would not be adequate to comply with this new regulatory framework. Thus, a new QA model had to be developed to meet the systemic needs of the new framework. While it was being developed, the pre-2011 QA model was still operational. As a result, existing processes continued to be used in the interim, and these were subject to continuous improvement (single-loop learning). This learning continued to influence the development of the new model. Impact of change agency and leadership The major change initiative of developing the QA model was in fact an 'intervention' that I led. My team and I experienced single-loop learning when we sought better ways to operationalise the pre-2011 QA model while the new model was being developed.
Where multiple *perspectives* are considered in an intervention. When acknowledging that a situation can be framed in different ways, this also questions the purpose and goals of an intervention.	Double-loop learning (*Learning to change*): • by reflecting on goals and assumptions, one probes the generative mechanisms of problems, their underlying causes and their consequences. • leads to adjustments in strategy and to better mid- and long-term course corrections in response to contextual changes.	Impact of systems thinking The team and I who were involved in the ARAL method in developing and implementing the QA model engaged in double-loop learning as we questioned the existing processes, procedures and policies, looked at multiple perspectives and developed long-term solutions to deal with the root causes of problems. Impact of change agency and leadership When leading the change initiative of the new QA model and also my other responsibilities in the quality portfolio at AIB, I had to look at each situation from multiple perspectives, understand the points of view of others, make them comfortable with the changes and motivate my team.

Core systems concepts	Loops of learning	As related to my practice
The focus is on the **boundaries** of any intervention and its evaluation and involves looking at the power relations that determine the boundaries of an intervention and its evaluation. The core question in triple-loop learning is '*what makes this the right thing to do?*'	triple-loop learning *(Learning to learn)*: by reflecting on the learning mechanisms, existing rules are challenged and possibly changed in ways that affect knowledge acquisition and behaviour, i.e. by identifying different patterns of recognising and handling problems or coping more effectively with contextual changes	Impact of systems thinking By asking the fundamental question of 'quality for whom' I challenged a lot of our existing practice (triple-loop learning), and while this might not have looked different to the customer, the purpose driving it was different. Our reason for implementing some practices changed, and hence the impact they had was greater in terms of organisational learning. Impact of change agency and leadership Throughout the process I changed personally, embracing the role of change agent while leading quietly within the organisation. I shifted my focus from fixing what we were doing and preventing issues, to questioning whether we were doing the right things, and this led to my leading organisational change with respect to the QA model and all related aspects. This may not have occurred had we not considered the deeper questions of 'quality for whom', how we were conceptualizing risk, and what we were prepared to sacrifice with regards to the different cultural contexts we were operating in.

Source: adapted from Hummelbrunner and Reynolds (2013:2)

Clearly the issues of systems thinking, change agency and leadership are mutually dependent and the attempt to separate the three issues is for clarity in analysis. The various practices of leadership, for example, resulted in changes which impacted on the system. It is not possible to consider one without the others, but it is possible to identify the leading factor (as noted above in the table) that drove the cycle of change. I reflect on this holistically in the next chapter.

Chapter 8   Conclusions

Given my realisation that I am a systemic thinker who fundamentally believes that the rules and regulations should be applied fairly and equally (in front of the law), the starting point for these conclusions had to be a discussion of how my Public Works and Context Statement address the assessment criteria outlined for the award. These are my project outcomes and learning outcomes. I will then conclude more generally with key learnings to be drawn from my work in terms of the process outcomes and my future direction.

8.1 Project and Learning Outcomes

A1. <u>Knowledge:</u> At the time that I started on the work that is now being presented as my 'Public Works' in submission for this doctoral award, I had no idea that it would end up being used for this purpose. At the time I was simply doing my job. Much of the development of my knowledge occurred in practice without my necessarily taking notes or critically critiquing my knowledge accumulation at the time other than with reference to the specific task in hand. Such an emergent approach to knowledge accumulation and theoretical understanding is difficult to document after the fact and is therefore implicit in the development of the Public Works presented. I could not have done the job at the time if I did not know what I was doing. That said, I have gone back to some of the key works and publications in the field to reference them in the Context Statement. However, my knowledge base far exceeded this through professional networking, broader reading within the profession and keeping abreast of changes occurring at the time.

A2. <u>Research and development capability</u>: I have tested the ARAL model in HE, as a new approach, as shown in my Public Work 1. It is only now, on reflection, that I can appreciate how it developed my research and development capability as a critically engaged methodology which is flexible and allows for changes to be made to cope with unforeseen situations. The additional reflective process applied in the writing of this Context Statement has added the recognition of the single, double and triple loop learning, which in turn are an additional insight and offering.

A3. <u>Ethical understanding</u>: I have provided, in Chapter 7, examples of ethical dilemmas that I have faced in various contexts such as working within the family business, issues with regulators and Teaching Centres, and how solutions were formulated in consultation with other stakeholders within the business.

B1. <u>Analysis and synthesis</u>: Drawing more than 20 years of work as a quality professional into a single document explaining three Public Works has been enlightening. The triple loop approach to learning has added a depth and understanding to my practice that had previously remained hidden. I have had the opportunity here to go back and reflect on my practice, drawing on my years of experience to redefine my understanding and development of a quality philosophy and the contribution this made to my practice. The questions of 'quality for whom?' and 'for what purpose are we measuring?' will be core philosophical questions to be answered in future quality endeavours and I will consider regulatory roles with more varied lenses in future.

B2. <u>Self-appraisal/reflection on practice</u>: Building the triple loop learning onto the ARAL method which was reflective in terms of operational impact, has allowed me the privilege of self-appraisal and reflection on my practice. My discussions with 'critical friends' have enabled me to understand how strongly the parental influences and my legal training have contributed to my systems thinking approach in my professional practice. I did not choose to be a quality assurance practitioner. This role evolved after Gibaran/AIB became a NUHEP and I was the obvious candidate. I learnt on the job as I did in my previous career as a legal practitioner. However, my legal training and the subconscious systems thinking approach acquired during that period helped me to cope with the 'unknown' in quality in HE and make a success of this second career. I also understand now the limitations that my legally-based epistemological understanding had on my view of the world and why I felt so overwhelmed by the political reality of the HE sector. The complication of working in a family business was less of a challenge than navigating the regulatory field politics. Also, I am aware that I am not a natural manager. My skills are more technical than managerial, and I struggle with delegation and performance-managing staff. This must be a carry-over from my legal training as I am more comfortable 'doing' than 'managing'.

B3. <u>Planning/ management of learning:</u> This doctoral submission has taken me longer to pull together than I had anticipated and, in many ways, has been harder than I expected. After all, it is my own work that I am writing about and it is work that has already occurred. The difficulty for me came from the feedback, questioning and thought challenges posed by my supervisor, advisor and other critical friends I engaged with. This took me to a whole new level of thinking and interpretation that took time to settle enough for me to be able to write. In the middle of my candidature, I had to take substantial breaks due to work commitments related to the extensive due diligence process prior to the dilution of the business, the lengthy preparations for the

re-accreditation submission and the time spent on responding to TEQSA's Requests for Further Information. This loss of momentum greatly hindered my progress. As someone who normally prides themselves for being on time and to standard, the lateness of this submission undermines my notion of quality behaviour but the content does meet my quality standards.

B4. <u>Evaluation:</u> Firstly, I used the external requirements and assessments such as the TEQSA review as an objective evaluation of my work outcomes. Secondly, the ARAL method involved my work being evaluated and scrutinized by the various action learning teams, and this was continually fed back through the AR cycles, embedding evaluation in the process. Finally, my self-evaluation and analysis through the writing of this Context Statement and the focus on triple learning has led to a critical evaluation that might otherwise not have occurred.

C1. <u>Awareness of operational context and application of learning:</u> The preparation of this Context Statement has made explicit the 'translation' of my experience from that of a legal practitioner implementing quality to that of a quality professional. In the first state, I was focussed on single and double loop learning only. As I shifted to a quality perspective, I developed my own philosophy of quality and how this should be enacted in practice, drawing on the triple loop learning methodology. This shift in disciplinary underpinning required a shift in understanding how 'to be' in the world, and the realities of the politics of HE.

C2. <u>Use of resources:</u> My role as Executive Director, Quality in AIB meant that I had access to all the information that I required to perform my job and develop the Public Works. I also had no difficulty in putting together a team of staff to work with me on the implementation of the AR cycles for each iteration of the QA Model. Whether these resources made themselves available to me because of my position within AIB, my role within the family – given it was a family business – or were simply procured as part of my job role, is difficult for me to ascertain. It was probably a combination of the three. While I would like to think that someone else carrying out the role would have had as much buy-in to the ARAL method, this would be naïve. It was therefore important to me that I did not misuse or abuse any of the resources I drew on, in terms of their time and effort, and as such I probably drew on them less than someone else might have done.

C3. <u>Communication presentation skills</u>: As a quality assurance practitioner, I engaged with several different academic communities, such as ACPET, where I was first a member of the State committee, and later of the national Higher Degrees Committee. I have also shared iterations of the QA model, both within AIB and at a number of academic conferences as shown in this Context Statement. The feedback received through these channels, and the simple immersion of being a member of these networks, benefitted my practice by allowing me to test my ideas. Having now been put together for this Context Statement, it may yet be published in journals as I seek further feedback and confirmation of the model beyond this doctoral submission.

C4. <u>Responsibility and leadership</u>: In addition to the reflections on my learning as a leader as set out in Chapter 7, I see myself as a leader in quality in the HE space, having overseen AIB's quality assurance for more than 20 years. My writing of this Context Statement has made this tacit positioning more explicit and more public and I will seek to continue leading in this way in the future, perhaps even offering a consulting service around the implementation of my QA model.

As a quality person, I could not resist addressing each criterion as stated above – it would be against my nature not to do so. However, to conclude this Context Statement, I wish to draw out what I believe are the key contributions that my work makes to practice and to the knowledge base for others to draw on.

8.2 Process Outcomes

First is the importance of adopting a triple loop learning approach to quality, rather than taking the easier single and double loop approach which equates to quality control and quality assurance. If an organisation does not have an underpinning philosophy of driving quality practice, it will meet requirements, but it will not have any measure of success beyond that or a focus for developmental activity. Organisations need to regularly review their definition of what quality is, who it is for, how it is being measured and whether these remain appropriate as the organisation develops and the environment changes.

Second is the opportunity to use an ARAL approach to develop and implement quality systems. Often the methodology is limited to projects and initiatives that have an end date or outcome rather than ongoing processes, but this does not need to be the case. The ARAL method allows for different people in the organisation to be involved in different cycles of learning simultaneously through the process of organisational change.

Third is that the QA model presented can be implemented in other organisations in the sector. I understand that the model continues to be used by AIB today. The application of this model in other institutions is something I will seek to pursue once this doctorate is completed.

I have been wondering whether I could have done anything differently in the production of my Public Works. The QA model had three iterations and in hindsight, the first version appears complicated and could have been simplified. In its defence, I believe that it had to start somewhere and while the process of developing the second version was painful, the benefit was that it was readily accepted and then implemented. The third version was a further revision to accommodate the changes in thinking by that stage. The TNE process was an example of continuous improvement in action and while in hindsight we could have done things better and earlier, I do not think that we could have done any better at the time using the process we used. The policies are further examples of works in progress. Sometimes, things got overlooked such as the most appropriate title of the policy on third party delivery. The important thing is that mistakes were picked up and corrected at the earliest opportunity.

8.3 Future direction

Having finished at AIB, my current role is Chief Executive of Global Centre for Work-Applied Learning (GCWAL) which Selva and I set up a few years ago. GCWAL's focus is on empowering people to learn for change, using Work-Based Learning and Work-Applied Learning. One of my main roles is to quality assure the GCWAL services so I am still a quality assurance practitioner.

As one of my future projects, I would like to provide a consultancy service in quality assurance in HE which is underpinned by a philosophy of quality, based on improvement rather than simply adherence. Adding a triple-loop approach to quality assurance raises the important question of 'quality for whom?'- a question that seems to be lacking in the HE context.

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