Feedback from CAUL about the Staffing, Learning Resources and Educational Support guidance note

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On behalf of the Council of Australian University Librarians (CAUL)
Overview
This document provides feedback from CAUL about the new TEQSA guidance notes developed for the Higher Education Standards Framework (HESF)\(^1\) 2015.

Of primary interest to CAUL is the new Staffing, Learning Resources and Educational Support guidance note\(^2\) that will replace the Information Resources guidance note\(^3\). The differences between these two documents and the implications of this change are the focus of the feedback contained in this document.

The document contains a number of recommendations that identify potential improvements to the new Staffing, Learning Resources and Educational Support guidance note and explanation of relevant sections in the HESF 2015.

The recommendations are:

1. A definition of the terms learning resources and information resources should be provided, or a more comprehensive definition of resources in general needs to be provided in the guidance note to clarify what the different terms refer to. The lack of a clear definition or definitions to help organise and make sense of the different kinds of resources is likely to create confusion for providers.

2. Use of the term ‘academic resources’ is inconsistent with the HESF 2015, the term can be removed and use of the term ‘resources’ limited to learning resources and/or information resources. Or if the intent is to provide explanation of standards relating to ‘academic resources’ then a clear definition of this term should be provided, and the Staffing, Learning Resources and Educational Support guidance note renamed to reflect this focus.

3. Explanations about staffing need to be generalised to encompass more than academic and teaching staff involved in learning resources and education support at an institution. This can be done by reproducing statements from the Information Resources guidance note.

4. TEQSA should consider the merits of producing an Educational and Student Support guidance note that covers Sections 2.3, 3.3 and 5.3 of the HESF 2015 separately from a Learning Resources guidance note.

5. Other explanations from the Information Resources guidance note can also be included which address topics of access, provision, review and 3\(^{rd}\) party providers.

6. TEQSA should consult with CAUL on the implementation of these recommendations and further development of the Staffing, Learning Resources and Educational Support guidance note. CAUL was originally involved in drafting the Information Resources guidance note, and members of CAUL have significant expertise and experience with learning and information resources. Other relevant stakeholders such as the Australian Library and Information Association (ALIA) could also be included.

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Comparison of guidance notes
This section provides a comparison of the original Information Resources guidance note with the new Staffing, Learning Resources and Educational Support guidance note. First a description of both documents is provided followed by some analysis is provided which compares term frequencies in both documents.

Description
The Information Resources guidance note provided an explanation for sections in the HESF 2011\(^4\). The relevant sections are reproduced in Figure 1 and are as follows.

‘the relevant Threshold Standards are in Provider Registration Standards Section 7: Physical and electronic resources and infrastructure (7.1; 7.2; 7.3; 7.4); and Provider Course Accreditation Standards Section 2: Course resourcing and information is adequate (2.1; 2.2; 2.3)’ (p.1).

Explanation in the new Staffing, Learning Resources and Educational Support guidance note relates to the incoming Higher Education Standards Framework (Threshold Standards) 2015\(^5\). The relevant sections from the HESF 2015 are reproduced in Figure 2, and are as follows.

‘The Standards concerned with staffing are at Section 3.2 and learning resources and educational support are covered at 3.3’ (p.1)

At a glance an important difference between the two documents is that the Information Resources guidance note covered more sections of the HESF than does the new Staffing, Learning Resources and Education Support guidance note but with a focus on a specific topic, whereas the new guidance note covers fewer sections of the HESF but with more topics.

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### Relevant sections from the HESF 2011:

#### Section 2 Course resourcing and information is adequate

2.1 Resourcing for the course of study is adequate to meet the higher education provider’s projected enrolments for the course of study and for students to achieve the expected learning outcomes.

2.2 The higher education provider ensures that all students readily have access, directly through the higher education provider or arranged by the higher education provider, to electronic and/or physical library and information resources required to achieve the learning outcomes of the course of study.

2.3 The higher education provider ensures there are adequate IT resources to facilitate student learning consistent with course of study requirements, as well as necessary access to specialised teaching facilities required specifically for the course of study, such as laboratories or studios.

2.4 The higher education provider demonstrates that accurate and current information and advice about the course of study is provided to prospective and current students.

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Section 7 Physical and electronic resources and infrastructure

The higher education provider ensures there are safe, well-maintained physical and electronic resources and infrastructure sufficient to enable the achievement of its higher education objectives, across all its locations in Australia and overseas.

7.1 The higher education provider ensures that there are safe, well-maintained facilities and infrastructure sufficient to achieve expected student learning and research outcomes, as appropriate to the scale, scope, location, mode of delivery and nature of its courses of study, including:

- classrooms and other teaching and learning spaces;
- library and/or learning resource centre spaces and collections, and electronic learning resources;
- laboratories and technical facilities;
- appropriate work environments for personnel who are on site, including research students;
- facilities for student support services; and,
- student meeting and recreation areas.

7.2 The higher education provider has adequate IT infrastructure and software to support student learning in its courses of study, including a website with current content, and ensures that students and personnel have ready access to online information and resources.

7.3 The higher education provider ensures that all students, regardless of mode of study, have access to one or more contact people who can respond to queries in a timely manner and has effective arrangements to actively maintain contact with and support students who are remote from or away from its locations.

7.4 The higher education provider maintains the adequacy and security of facilities and resources through effective capital and IT planning and project management, adequate for its scale and scope.

Figure 1: Reproduction of sections 2 and 7 from the HESF 2011

Relevant sections from the HESF 2015:

3.2 Staffing

1. The staffing complement for each course of study is sufficient to meet the educational, academic support and administrative needs of student cohorts undertaking the course.

2. The academic staffing profile for each course of study provides the level and extent of academic oversight and teaching capacity needed to lead students in intellectual inquiry suited to the nature and level of expected learning outcomes.

3. Staff with responsibilities for academic oversight and those with teaching and supervisory roles in courses or units of study are equipped for their roles, including having:
a. knowledge of contemporary developments in the discipline or field, which is informed by continuing scholarship or research or advances in practice

b. skills in contemporary teaching, learning and assessment principles relevant to the discipline, their role, modes of delivery and the needs of particular student cohorts, and

c. a qualification in a relevant discipline at least one level higher than is awarded for the course of study, or equivalent relevant academic or professional or practice-based experience and expertise, except for staff supervising doctoral degrees having a doctoral degree or equivalent research experience.

4. Teachers who teach specialised components of a course of study, such as experienced practitioners and teachers undergoing training, who may not fully meet the standard for knowledge, skills and qualification or experience required for teaching or supervision (3.2.3) have their teaching guided and overseen by staff who meet the standard.

5. Teaching staff are accessible to students seeking individual assistance with their studies, at a level consistent with the learning needs of the student cohort.

3.3 Learning Resources and Educational Support

1. The learning resources, such as library collections and services, creative works, notes, laboratory facilities, studio sessions, simulations and software, that are specified or recommended for a course of study, relate directly to the learning outcomes, are up to date and, where supplied as part of a course of study, are accessible when needed by students.

2. Where learning resources are part of an electronic learning management system, all users have timely access to the system and training is available in use of the system.

3. Access to learning resources does not present unexpected barriers, costs or technology requirements for students, including for students with special needs and those who study off campus.

4. Students have access to learning support services that are consistent with the requirements of their course of study, their mode of study and the learning needs of student cohorts, including arrangements for supporting and maintaining contact with students who are off campus.

Figure 2: Reproduction of section 3, 3.1 staffing and 3.3 learning Resources and Educational Support from the HESF 2015
Analysis
An analysis of the documents text using simple data mining techniques is provided in Figure 3 and Figure 4, which present word frequency clouds for the two documents.

The word clouds show that the frequency of the term resources is common between the two documents. The clouds show change in terminology, with learning replacing information and a clear emphasis on teaching and needs being introduced and reference to libraries diminished. A visualisation comparing the word frequencies between the two documents is presented in Figure 5. The visualisation shows all words with a frequency greater than four occurring in either document.

The Staffing, Learning Resources and Educational Support guidance note summarises the contents of the Information Resources guidance note under the heading learning resources and educational support, reproduced here as Figure 8. By combining the topics of Staffing, Learning Resources, Education Support and Information Resources into a single guidance note there is less emphasis on any one topics. Comparison of the word clouds shows a greater range of terms occurring more than three times in the new guidance note, a total of 87 compared to 52 in the Information Resources guidance note.

Table 1 presents the top five terms from each document, excluding general terms like ‘will’ and ‘TEQSA’. It clearly highlights the difference between the two documents. While the topics of learning resources and staffing feature strongly in the new guidance note this analysis shows that the topic of educational support does not. While the terms do occur relatively frequently they are not the main focus of the guidance note.

<table>
<thead>
<tr>
<th>Top five terms</th>
<th>Information Resources guidance note</th>
<th>Learning Resources and Educational Support guidance note</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resources</td>
<td>1</td>
<td>Resources</td>
</tr>
<tr>
<td>Information</td>
<td>2</td>
<td>Learning</td>
</tr>
<tr>
<td>Students</td>
<td>3</td>
<td>Teaching</td>
</tr>
<tr>
<td>Library</td>
<td>4</td>
<td>Staff</td>
</tr>
<tr>
<td>Access</td>
<td>5</td>
<td>Standards</td>
</tr>
</tbody>
</table>

Table 1: Comparison of top five most frequent terms
Figure 3: Word frequency map for the Information Resources guidance note

Figure 4: Word frequency map for the Staffing, Learning Resources and Educational Support guidance note
Figure 5: Comparison of word frequencies between guidance notes where a words frequency is greater than four
Areas of feedback

This section identifies areas of feedback and provides recommendations to improve the Staffing, Learning Resources and Educational Support guidance note and explanation of the relevant sections in the HESF 2015.

Definitions and scope

Despite the differences between the two guidance notes identified by the proceeding analysis a focus on resources remains consistent. However, the term resources is used much more liberally in the new Staffing, Learning Resources and Educational Support guidance note. Previously the Information Resources guidance note defined Information resources as library and information resources which:

‘refers to all physical and digital materials including educational resources that provide information relevant to curricula and research, including infrastructure such as electronic databases, that are made available by a provider to support the higher education objectives of its operations’ (p.1).

The new guidance note does not contain this definition. In addition to information resources, the new guidance note mentions many other kinds of resources including academic, learning, scholarly and teaching resources in addition to information resources.

The lack of a clear definition or definitions to help organise and make sense of the different kinds of resources is likely to create confusion for providers.

Given that the purpose of a guidance note is to provide clarity for providers in the interpretation and application of selected standards the new guidance note should provide an explanation for what is meant by different ‘resources’ and describe how they are related. This could include the original definition of Information Resources, or a new one could be created.

The new guidance note starts by introducing the term ‘academic resources’ when describing “what do ‘staffing’, ‘learning resources’ and ‘educational support’ encompass?”. I states that these topics encompass academic resources which include staff, learning resources and educational support services that are made available for a particular course of study.

If the intent of the document is to provide explanation of standards relating to ‘academic resources’ then a clear definition of this term should be provided, and the guidance note renamed to reflect this focus. However, since the term only appears once, and does not appear in the HESF 2015 an alternative approach is to not use the term. Drawing on analysis presented here, use of the term ‘resources’ could be limited to learning resources and information resources to prevent confusion.

Staffing and the university library

At the beginning of the Staffing, Learning Resources and Educational Support guidance note it is stated that it is intended to refer to:

‘the complement of staff (academic, professional or other staff) who are involved directly in the supervision and/or delivery of the course’ and it is stated that,

http://www.teqsa.gov.au/for-providers/provider-resources
‘Other staffing, facilities and resources that are of a more general nature and are not primarily academic services or specific to a particular course of study are covered elsewhere in the HES’ (p.1)

However, this statement is inconsistent with the contents of the new guidance note, which covers a broader range of topics that are not only about academic or teaching resources. The learning resources and educational support services referred to involve staff and areas of an institution that are not involved directly in the supervision and/or delivery of a course. This was recognised in the original Information Resources guidance note that contained statements such as:

‘Information resources are managed by suitably qualified and experienced staff to support and identify the learning needs of student’ (p. 2)

The Information Resources guidance note recognised that institutional staff play an important role in managing Information Resources, and that dedicated library and information resources staff with suitable qualifications and experience are required. These statements are not reproduced in the new guidance note.

By trying to focus on academic and teaching staff the new guidance note overlooks staff and services such as library staff, or learning support services that are relevant to the standards being explained. To address this, statements of a more general nature should be included, and potentially these could be copied from the Information Resources guidance note.

For example:

Staff with responsibilities for providing learning resources and learning support services are suitably qualified and experienced to support and identify the learning needs of students in relation to accessing information resources and referencing systems.

Facilities, infrastructure, support and environment

In its introduction the new Staffing, Learning Resources and Educational Support guidance note does not list sections 2.1 Facilities and Infrastructure or 2.3 Wellbeing and Safety (reproduced in Figure 6) of the HESF 2015 as relevant standards. However, Sections 2.1 and 2.3 of the standards are mentioned in relation to learning resources and educational support within the guidance note:

‘TEQSA will also assess the adequacy of more general educational support provided to students who are at risk (or potentially at risk) of not making sufficient progress, such as support for language development and building of academic study skills (e.g. see Section 3.3). In so doing, TEQSA will have regard to the adequacy of educational facilities overall (see Sections 2.1 and 2.3) for the relevant student cohorts and their level and mode of participation’ (p. 5).

Section 2.1 covers facilities and infrastructure related to educational activity, electronic information, the learning environment and associated learning activities. The Information Resources guidance note originally provided explanation of standards relating to physical and electronic resources and infrastructure, including statements such as:

‘There are appropriate and accessible physical spaces for information resources including library services and related student study, as appropriate to the provider’s mode of delivery’.

The explanations included in the Information Resources guidance note are useful for explaining the kinds of infrastructure (e.g. university libraries), services and activities that are relevant under the
HESF 2015. Further explanation could be included about the facilities and infrastructure that relate to learning and information resources, particularly making reference to the role of the university library.

Section 2.3 covers support services and the importance of a safe environment. This section of the standards is directly related to educational support and is relevant to the new guidance note.

This section is not covered by another guidance note, but its inclusion in the Staffing, Learning Resources and Educational Support guidance note would likely lead to the explanations becoming even more general by further increasing the range of topics covered.

Since analysis shows that the related topic of educational support does not feature strongly in the new guidance note, a potential option is to create a new guidance note focusing on Educational and Student Support, which covers sections 2.3 and 3.3 of the HESF 2015. Other sections related to students could also be referenced such as section 5.3 Monitoring, Review and Improvement.

### 2.1 Facilities and Infrastructure

1. Facilities, including facilities where external placements are undertaken, are fit for their educational and research purposes and accommodate the numbers and educational and research activities of the students and staff who use them.

2. Secure access to electronic information and adequate electronic communication services is available continuously (allowing for reasonable outages for maintenance) to students and staff during periods of authorised access, except for locations and circumstances that are not under the direct control of the provider.

3. The learning environment, whether physical, virtual or blended, and associated learning activities support academic interactions among students outside of formal teaching.

### 2.3 Wellbeing and Safety

1. All students are advised of the actions they can take, the staff they may contact and the support services that are accessible if their personal circumstances are having an adverse effect on their education.

2. Timely, accurate advice on access to personal support services is available, including for access to emergency services, health services, counselling, legal advice, advocacy, and accommodation and welfare services.

3. The nature and extent of support services that are available for students are informed by the needs of student cohorts, including mental health, disability and wellbeing needs.

4. A safe environment is promoted and fostered, including by advising students and staff on actions they can take to enhance safety and security on campus and online.

1. There is a critical-incident policy together with readily accessible procedures that cover the immediate actions to be taken in the event of a critical incident and any follow up required.

*Figure 6: Reproduced from Section 2.1 and 2.3 of the HESF 2015*
Other comments
The Information Resources guidance note provided specific guidance on the quality of library and information resources, and covered a range of related topics including access, provision, review and 3rd party providers. These topics are summarised in Figure 7.

<table>
<thead>
<tr>
<th>Topics summarised from the Information Resources guidance note</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Access – both on and off campus, which needs to include library services, systems and information resources;</td>
</tr>
<tr>
<td>• Provision – needs to be reflected in the institution’s governance and organisational processes such as budgeting and strategic planning;</td>
</tr>
<tr>
<td>• Review – Information resources need to be reviewed through the use of, student feedback, benchmarking, usage data and specific information systems and should focus on learning needs.</td>
</tr>
<tr>
<td>• 3rd Party Providers – institutions will make arrangements with 3rd parties, including other providers, for the provision of information resources.</td>
</tr>
</tbody>
</table>

Figure 7: Topics summarised from the Information Resources guidance note

The topics in Figure 7 and related explanation in the Information Resources guidance note should be addressed in new guidance’s notes related to the HESF 2015, it is possible to update statements from the Information Resources guidance note and migrate them. Examples of how these topics could be included are as follows:

The role of students in the review of resources is important, but no explanation is provided about the kinds of evidence TEQSA may seek to review learning, information or other resources. In Figure 8 it is only stated that:

‘Evidence of processes to manage and review the provision of learning resources and how a provider ensures that they are appropriate may also be sought’.

Explanation as to what evidence TEQSA may look for, particularly in regards to the involvement of students in review may be helpful to providers.

The topic of providers and 3rd party provision is covered by the Third-Party Arrangements guidance note, but explanation of a provider’s responsibilities for ensuring access to adequate and sufficient learning, information or other resources should be given.

Reflecting the provision of information and learning resources in institutional budgets and strategic plans is also an important topic that should be covered. However, its coverage in the current set of guidance notes is unclear, and it may belong in guidance notes not currently available for consultation.
Learning resources and educational support

In assessing the learning resources and educational support that is offered overall, TEQSA will be concerned with three broad dimensions:

- quality
- sufficiency, and
- access.

For this purpose ‘level’ means a level of qualification in the Australian Qualifications Framework (AQF) or equivalent.

In relation to the quality of the resources, TEQSA will need to be satisfied that the resources are:

- relevant to the expected learning outcomes
- appropriate to the level of study
- authoritative, and up to date.

TEQSA may seek the views of experts in the relevant field of education.

TEQSA will assess the adequacy of information resources overall as well as for each field of education offered (in the context of an application for registration) and the adequacy of information resources for each course (in the context of an application for course accreditation). This will include the availability and accessibility of full-text digital access for information resources listed (as required) on academic outlines, including book chapters, journal articles and conference papers, and to support scholarship and research in the field of education.

TEQSA will also assess the adequacy of more general educational support provided to students who are at risk (or potentially at risk) of not making sufficient progress, such as support for language development and building of academic study skills (e.g. see Section 3.3). In so doing, TEQSA will have regard to the adequacy of educational facilities overall (see Sections 2.1 and 2.3) for the relevant student cohorts and their level and mode of participation.

Evidence of processes to manage and review the provision of learning resources and how a provider ensures that they are appropriate may also be sought.

Should a provider wish to outsource provision of learning resources, e.g. to another higher education provider, TEQSA will need to be satisfied that:

- the arrangement is subject to a formal agreement
- there are no unreasonable barriers to access, and
- it is practicable for students (e.g. not involving unreasonable travel time).

TEQSA will not accept a model in which the provider makes no provision for information resources itself and refers students to a public library, which is unlikely to provide full access to the scholarly resources required.

Figure 8: Extract from the Staffing, Learning Resources and Educational Support guidance note (pp. 3-5)