Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia

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ASSESSMENT MODERATION AS A QUALITY MANAGEMENT PROCESS IN NON SELF-ACCREDITING HIGHER EDUCATION INSTITUTIONS IN AUSTRALIA

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A Thesis Submitted in Partial Fulfilment of the Requirements of the Award of Doctor of Business Administration
Declaration

I certify that the work presented in this thesis is, to the best of my knowledge and belief, original, except as acknowledged in the text, and that the material has not been submitted, either in whole or in part, for a degree at this or any other university.

I acknowledge that I have read and understood the University’s rules, requirements, procedures and policy relating to my higher degree research award and to my thesis. I certify that I have complied with the rules, requirements, procedures and policy of the University (as they may be from time to time.)

David McDonald

Date: January 27, 2016
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Abstract

Assessment moderation is an important quality assurance management process for the Australian higher education system. It refers to an integrated set of actions that the Tertiary Education Quality and Standards Agency requires higher education institutions to implement as part of the student assessment system. The degree to which higher education institutions in Australia have successfully implemented assessment moderation has, however, received scant empirical attention.

This investigation seeks to throw light on assessment moderation in the context of the non self-accrediting higher education sector in Australia. It addresses questions about how assessment moderation is understood and implemented in the sector, about how well it is valued, and about the kinds of challenges its implementation may face. The non self-accrediting higher education sector has grown significantly since 2006 and now accounts for almost eight per cent of all higher education enrolments in Australia. The sector differs from the self-accrediting university sector in that its focus is on teaching only, and the large majority of providers in the sector are privately owned.

In this investigation, the experiences with assessment moderation of 21 members of staff drawn from four institutions are explored in depth. Of interest are their understandings about the purpose and nature of assessment moderation, their engagement with its implementation, their perceptions of its value, and their views about the drivers and constraints affecting its successful implementation. An ethnographic approach is taken to the collection of data, and the investigation is framed by the methodology of Naturalistic Inquiry (Lincoln & Guba, 1985).

The findings suggest that, although there is a high level of importance attached to assessment moderation as a quality management process, understandings of its nature are varied and, to a surprising extent, are at odds with the model for assessment moderation that has been developed for the higher education system by the Australian Learning and Teaching Council. Implementation of assessment moderation across the four sites selected for the present investigation is found to be patchy, and there are some clearly identifiable impediments to success, not the least of which is the extent of the reliance of non self-accrediting higher education institutions on a casual teaching workforce that is untrained in the purposes and processes of assessment moderation.

The investigation concludes that, though assessment moderation may well be highly valued, there is a need for better leadership, more training and stronger commitment if the process is to become a distinctive hallmark of quality management in the non self-accrediting higher education sector. The investigation has clear policy implications for the entire higher education sector.
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Abbreviations

ALTC – Australian Learning and Teaching Council
AQF – Australian Qualifications Framework
ATAR – Australian Tertiary Admissions Ranking
AUQA – Australian Universities Quality Agency
CAE – College of Advanced Education
DEEWR – Department of Employment Education and Workplace Relations
DEST – Department of Education Science and Training
DET – Department of Education and Training
NSAI – Non Self-Accrediting Institution
NUHEP – Non-University Higher Education Provider
OLT – Office for Learning and Teaching
PPP – Public Private Partnership
QAA – Quality Assurance Agency
SAI – Self-Accrediting Institution
TEQSA – Tertiary Education Quality and Standards Agency
UAC – Universities Admission Centre
Chapter 1

Introduction

This thesis concerns assessment moderation in the context of the non self-accrediting higher education sector in Australia. Assessment moderation is fundamental to the integrity and quality of a higher education system, and yet there have been remarkably few empirical reports about the process in the Australian literature. The non self-accrediting higher education sector is similarly under-reported in the Australian literature, despite the fact that it now accounts for about eight per cent of all higher education students in Australia. This investigation seeks to throw light on assessment moderation in the non self-accrediting higher education sector, addressing questions about how assessment moderation is understood and implemented in the sector, its perceived value, and what obstacles to effective implementation it may face. The investigation has its genesis in a deepening concern on the part of the researcher, who has extensive professional experience in the non self-accrediting higher education sector, that the sector is threadbare in terms of its approach to assessment moderation, even though the Commonwealth Government, through its Tertiary Education Quality and Standards Agency (TEQSA), requires the sector to demonstrate a commitment to implementing assessment moderation as a quality management process. This first chapter introduces the nature, scope and methodology of the investigation. The chapter begins with a brief account of the setting.

1.1 Setting

1.1.1 Assessment Moderation

Assessment moderation is an important quality assurance management process for higher education. It refers to an integrated set of actions to be implemented as part of the student assessment system in higher education institutions. These actions include: reviewing teaching and learning outcomes; designing an assessment framework; weighting the relative importance of different assessment components; developing and implementing a set of marking guidelines; briefing students about assessment standards and marking guidelines; reviewing the marking process and outcomes to ensure consistent approaches and standards
among markers; evaluating grade distributions; ratifying academic results; and reviewing the whole of the assessment process. In Australia, an assessment moderation flowchart published by the Australian Learning and Teaching Council (ALTC) in 2010 provides a scholarly reference point for the implementation of assessment moderation processes across the higher education system (ALTC, 2010a). The assessment moderation flowchart was proposed by Mahmud and Sanderson (2011), following their investigation of teaching and learning standards and quality management in transnational institutions. The flowchart was also considered to have wider application. The degree to which higher education institutions in Australia have successfully implemented assessment moderation has, however, received scant empirical attention.

When first addressed in the literature on quality management in higher education, assessment moderation was seen as a two-part process that involved pre-assessment ‘quality assurance’ and post-assessment ‘quality control’. Harlen (1994), an early exponent of the process, claimed that assessment moderation procedures ‘fall broadly into those concerned with adjustment of the outcome of the assessment to improve fairness (quality control) and those concerned with arriving at fair assessments (quality assurance)’ (Harlen, 1994, pp. 6-7). Other scholars subsequently built upon this conception. Maxwell (2002), for example, extended Harlen’s conception by identifying an additional stage, known as ‘quality monitoring’, which required a review of the moderation process itself, giving attention to matters such as assessment outcomes and how well responsibility for assessment moderation was delegated. Oliver, Lawson and Yorke (2008) then proposed several further stages. These concerned communication with students about standards, collaboration between markers to achieve consistency, and the provision of formative feedback to students about their progress. In 2010, the ALTC, a Commonwealth Government agency that later became the Office for Learning and Teaching (OLT), reconceptualised assessment moderation as a framework with three phases: an assessment design and development phase; an implementation of marking and grading phase; and a review and evaluation phase (Mahmud & Sanderson, 2011). The ALTC’s flowchart, details of which are reported in Chapter 2, focused on the iterative and cyclical nature of effective assessment moderation systems.

An appreciation of the need for assessment moderation has developed against the recent background of increasing concern about the need to improve the quality of student
assessment practices in higher education institutions. Harvey and Williams (2010), in a
review of papers published since 1995 in the international journal, *Quality in Higher
Education*, identified more than a dozen articles that explicitly addressed student assessment
as an element in the quality of the student experience. Harvey and Williams reported that
these articles argued for a shift away from traditional examination-oriented systems of
student assessment to systems of assessment that are more motivating for students, more
transparent, and more focused on directly measuring predetermined learning outcomes
(Harvey & Williams, 2010). One of the earliest of the articles reviewed, by Erwin and
Knight (1995), reported on student assessment practices in the United States and the United
Kingdom, noting significant deficiencies in institutional approaches to student assessment in
both countries. They identified the need for better communication with students about
curriculum aims and assessment criteria; more widespread use of formative assessment
approaches; the provision of formative, constructive feedback to students on how they might
improve their work; the more effective utilisation of assessment data as a basis for reviewing
programs; and the need for strategic, data-led decision-making about resource allocation.
Miller, Imrie and Cox (1998), in a handbook drawing on the experiences of practitioners and
researchers in Australia and Hong Kong, endorsed similar proposals.

Assessment moderation provides a framework within which these needs can be more
systematically and effectively addressed. The framework provides for enhanced levels
reliability in the standards applied when awarding grades; and for validation of the
achievement of predetermined student learning outcomes and graduate attributes. In turn, it
enhances confidence that the knowledge and skills acquired by graduates are valid and
credible according to regulatory authorities (see, for example, ALTC, 2010b; Queensland
Studies Authority, 2010). Assessment moderation frameworks may be applied across all
subject areas, all qualification streams and all kinds of higher education providers, both
public and privately-owned. Assessment moderation frameworks may also be applied to any
kind of student assessment task. As one institution asserts, the role of an assessment
moderation process is simply to ensure that ‘marks and grades are as valid, reliable, and fair
as possible for all students and all markers’ (Edith Cowan University, 2012, p. 1).

In Australia, it was not until assessment moderation became a mandatory theme in
institutional audits conducted from 2001 onwards by the Australian Universities Quality
Agency (AUQA) that a system-wide response to the need for assessment moderation became evident. The attention given by AUQA to assessment moderation accentuated its importance for the higher education sector, enabling it to become, as Frankland (2007, p. 1) described, ‘a critical component of teaching and learning in contemporary universities’. AUQA audits of universities over the period from 2001 to 2006 required universities in Australia to address a range of challenges associated with the institutional implementation of assessment moderation (Stella & Liston, 2008). Then, beginning in 2006, AUQA began auditing all higher education providers in the non self-accrediting higher education sector. By 2011, all institutions in that sector were required to address the same kinds of challenges that institutions in the self-accrediting sector were required to address.

1.1.2 The Non Self-Accrediting Higher Education Sector

In February 2015, there were 172 higher education providers in Australia registered through TEQSA by the Commonwealth Government. Among these institutions were 40 universities, one university of specialisation, two foreign universities, and 129 non self-accrediting institutions (NSAIs) (TEQSA, 2015b). Universities registered through TEQSA are autonomous and self-accrediting; that is, though required to comply with quality-related standards expressed in the Australian Qualifications Framework (AQF), they are not required to have their award programs accredited by TEQSA. NSAIs, in contrast, must obtain TEQSA accreditation for their award programs, although the Commonwealth has recently approved some exceptions on the basis of its confidence in the internal accreditation of a small number of NSAIs (Lane, 2014). The total enrolment in NSAIs is currently estimated to be about 81,000 students, which represents about 8 per cent of all higher education enrolments in Australia (DET, 2014d).

The NSAI sector emerged and began to be integrated with the Australian higher education system following the adoption of the Higher Education Support Act 2003. This Act provided a powerful incentive for those non-university higher education institutions already in existence and accredited under various types of state and territory legislation to become registered as higher education providers under the Commonwealth legislation. Importantly, registration with the Commonwealth as a higher education provider offered each of these institutions the opportunity to register their programs for eligibility for FEE-HELP, a system
whereby public loan funds are made available by the Commonwealth to domestic higher education students to support them in covering their tuition costs. By offering FEE-HELP to domestic NSAI students, the Act provided an economic incentive for expansion of the NSAI sector. In 2005, there were 33 NSAIIs registered with the Commonwealth as higher education providers. These institutions had a total enrolment of 11,400 students. By 2010, there were more than 80 NSAIIs registered with the Commonwealth as higher education providers, with a total enrolment of 65,500 students (DEEWR, 2010).

NSAIIs are predominantly, but no means exclusively, private-sector higher education institutions (Ryan, 2012). The scholarly literature that relates most closely to them concerns private-sector higher education, but this literature (see, for example, Levy, 2006; Middlehurst & Fielden, 2011) derives mainly from other countries with large private higher education sectors. It was not until the early 1990s that private-sector higher education institutions began to flourish in Australia. Scholarship in Australia on private-sector higher education is, accordingly, not well developed. A body of literature in this area is, however, emerging (see, for example, G. Brown & Shah, 2009; Shah, 2012; Shah & Sid Nair, 2013; Shah & Stanford, 2013). Its focus to date has been confined mainly to regulatory matters.

The history of development of NSAIIs in Australia deserves consideration. For many years prior to 2005, there were many NSAIIs conducting tertiary-level programs in Australia (Harman & Meek, 2000, p. 31). Some were linked with public universities, some were long-term industry-related training providers, and many were commercial providers offering programs that were accredited by state or territory agencies. As Stone (1990) reported, the more commercially-oriented segment of the sector became better established during the late 1980s, catering mainly to the growth in demand from overseas students, following changes in 1985 to Australia’s overseas student enrolments policy. By the late 1990s, there were as many as 70 to 80 non-university providers, including theological colleges, training institutes established by professional and industry associations, business colleges, colleges offering training programs in alternative health practices, and colleges established to provide sub-degree programs approved for credit transfer to degree programs at public universities (Harman & Meek, 2000; Watson, 2000). These institutions mainly enrolled part-time students and their individual enrolment numbers were often quite small. The procedures followed by state and territory governments in accrediting their programs varied from one jurisdiction to
the next. As identified by Harman and Meek (2000), there was the clear need for a more uniform approach to institutional and course accreditation across the states and territories.

The *Higher Education Support Act 2003* responded to this need by requiring NSAIs seeking to become registered higher education providers for the purposes of accessing the FEE-HELP scheme to satisfy certain prudential and quality-related requirements specified by the Commonwealth. The Commonwealth required, for example, that they should be incorporated, managed and controlled within Australia, able to satisfy tuition assurance requirements, and able to meet quality and accountability requirements. The legislation, which took effect in 2005, also required them to become subject to audit by AUQA. Prior to 2012, the registration by NSAIs with the Commonwealth as higher education providers was voluntary. In 2012, following an agreement between the Commonwealth and the states/territories, all institutions offering higher education programs in Australia were required to qualify for and be listed on a National Register of Higher Education Providers, maintained for the Commonwealth by TEQSA.

### 1.2 Focus of the Investigation

This investigation seeks to provide an in-depth understanding of the process of assessment moderation as experienced at a selection of non self-accrediting higher education institutions in Australia. The investigation focuses entirely upon illuminating the nature of the assessment moderation processes within these institutions. It does not seek to rate, rank, evaluate or critique individual higher education providers in terms of their effectiveness in implementing these processes.

The investigation focuses specifically on the experiences of executives, managers and members of teaching staff at each of the four site institutions in implementing assessment moderation processes. The four site institutions were selected with a view to achieving a maximum variation of assessment moderation processes within the NSAI sector. On account of the researcher’s extensive knowledge of the sector, it was possible to select, and then subsequently recruit, four site institutions that would provide insights regarding the range of assessment moderation processes likely to be found across the sector. The investigative
approach adopted was considered a sound basis for obtaining thick, rich description of the assessment moderation processes being implemented in the sector.

Four research questions were developed to guide the investigation. First, how do participants in the investigation understand assessment moderation? This question was of interest because to date there has been no published investigation of the extent to which there is a common understanding of assessment moderation among executives, managers and members of academic staff in NSAI’s in Australia. Second, what are the assessment moderation processes being employed at each of the site institutions? This question seeks to document the processes that individuals perceive are being implemented within their institutions. A related consideration concerns the extent to which the practices reported are similar across the site institutions, and, further, the extent to which these practices are consistent with the Mahmud and Sanderson (2011) assessment moderation flowchart. Third, what is the value placed upon assessment moderation processes by the participants from each of the site institutions? Further, how willing are the participants to engage in assessment moderation processes? Any marked differences between the four site institutions might reflect variations in institutional assessment moderation cultures. Finally, what incentives and constraints are perceived by the participants as influencing the implementation of assessment moderation frameworks in their institutions? Whereas the third research question is intended to discover levels and types of individual commitment to assessment moderation, this final question focuses on the drivers and constraints perceived to be affecting the implementation of assessment moderation within the four selected site institutions.

The investigation is important and of considerable significance to Australia’s NSAI sector. It is important for three reasons. First, it addresses a topic that is intrinsically important in terms of the integrity of teaching and learning in Australian higher education institutions. According to Sadler (2009, p. 812), “student assessment is not a precise science; rather it is a question of professional judgement by individuals”. Assessment moderation is, in this context, a process of critical importance to ensuring that the processes involved in making professional judgements about the standard of student achievement are transparent, soundly based, and subject to continuous improvement. Furthermore, as Tuovinen et al. (2014) identified, assessment moderation is at present poorly understood within NSAI’s in Australia.
Second, the investigation addresses a topic that has to date received scant attention in the literature. The AUQA audit reports provided the first concrete evidence of limitations in the implementation of assessment moderation processes across the higher education system. Winchester (2007), who reviewed ten AUQA audit reports produced over the period from January 2007 to July 2009, identified specific weaknesses in the implementation of assessment moderation processes within NSAI institutions. She observed that assessment moderation processes in NSAI institutions were neither clearly defined nor properly embedded within institutional policies (Winchester, 2007, p. 2). Stella and Liston (2008), reporting more broadly on assessment moderation in the university sector, noted limitations and inconsistencies in the implementation of assessment moderation processes within those institutions. The present investigation provides an opportunity to examine in more detail than has any previous report the ways in which assessment moderation is implemented in NSAI, and to record for the first time the attitudes and values of executives, managers and members of teaching staff responsible for its implementation. By using an ethnographic approach to the collection of data, the investigation is well placed to illuminate the culture of assessment moderation as experienced by teaching, management and executive members of academic staff at the four selected site institutions. Clearly, the identity of the site institutions must remain confidential, and all related requirements for human research ethics must be met.

Third, the investigation addresses a topic of immense importance to the quality of the contribution made to higher education in Australia by the non self-accrediting institutions. As attested by the Committee of Review of the Australian Higher Education System appointed by the Commonwealth Government in 2008 (Bradley, Noonan, Nugent & Scales, 2008a, p. 119), the Australian higher education system has achieved a global reputation for its quality. Cully (2014) observed that this reputation has, in turn, been responsible for generating a significant revenue stream for Australian higher education institutions. Safeguarding the system’s reputation for quality is a matter of national importance, as Dill and Beerkens (2010, p. 144) have identified. The recent rapid growth in the number of NSAI, in a sector where profit-seeking companies dominate, has increased the need for vigilance in maintaining and ensuring the highest quality academic standards. According to several researchers (see, for example, Coates, Dobson, Goedegebuure & Meek, 2009, p. 47; Shannon, McComb & Martin, 2011, p. 2), profit-seeking companies that own NSAI typically attempt to reduce costs by employing a high proportion of casual academic staff and by containing their managerial
commitments. Implementing quality management processes incurs a significant cost for these companies. A challenge for the higher education system in Australia concerns avoiding any threat to its reputation as a result of insufficient expenditure on the implementation of a quality management framework. This challenge directly involves assessment moderation frameworks and processes. It is important, therefore, to take note of the experiences of existing academic staff in NSAIs who are directly concerned with the implementation of assessment moderation processes. It is recognised within the parameters of this investigation that the reputational risk for such individuals in divulging any implementation-related shortcomings is considerable and far-reaching. As a consequence, protecting their anonymity, together with the anonymity of their institutions, is a high priority in conducting and reporting the present investigation.

1.3 Methodology

Naturalistic Inquiry (Lincoln & Guba, 1985) was chosen for the investigation because the research focus concerns documenting the experiences, perceptions and attitudes of executives, managers and members of teaching staff at four selected site institutions. Naturalistic Inquiry typically employs an ethnographic approach to data collection, that is, one which requires the use of in-depth interviews conducted in a setting that is natural for the participants. It is an approach that aims to illuminate participant experiences, perceptions and attitudes in relation to a social phenomenon by requiring the researcher to become immersed in the natural setting of the participants: in this case the NSAI sites chosen for the investigation. The researcher seeks to document the nature of the setting and, by examining the range of issues, claims and concerns expressed by the participants, the culture of the setting. A feature of Naturalistic Inquiry is that it seeks to be emancipatory; that is, it provides an opportunity for participants to reflect on their own views and experiences, and to interact with the researcher to learn about the expressed experiences of others in similar situations. Through prolonged engagement with the participants and their settings, the researcher seeks also to observe and then record participant understandings and behaviours that are tacit in nature. Details about the methodology for the investigation are reported in Chapter 4.

A typical feature of Naturalistic Inquiry is the use of purposive sampling, which enables information-rich participants to be selected to bring to light a deeper understanding of how
individuals experience a particular phenomenon. The sites for the present investigation needed to be highly representative of the sector in their offerings, their sizes and their experiences of mandatory reporting to AUQA of assessment moderation frameworks. From an operational perspective, the key criteria were: that the participating institutions should provide for the coverage of a range of higher education programs and qualifications; that they should each have at least 200 students enrolled; and that they should have been audited at least once by AUQA. It was also considered important that each of the site institutions should have a reasonably well-defined organisational structure, involving executives (deans, directors, associate directors), managers (program managers, heads of departments, heads of academic studies) and teaching staff members (full-time and sessional). For convenience of data collection, it was also important that all sites should have their main campuses in the same city.

Based on the documented experiences of participants at the four site institutions, the findings from the investigation should potentially be transferable to other NSAIIs, and should be of interest to other researchers with an interest in the assessment moderation experiences of academic staff members at NSAIIs in the Australian higher education system. The methodology of Naturalistic Inquiry does not provide for generalisations from a sample to the general population, but rather, as in the present investigation, it is well suited to developing comprehensive and richly described accounts that may possibly be transferable to other similar settings.

1.4 Values of the Researcher

In Naturalistic Inquiry, as in post-positivist research more broadly, the researcher is the instrument for the enquiry. The researcher’s biases must, therefore, be explicated. The researcher needs to adopt the concept of Verstehen (Martin, 2000), in which biases are acknowledged and declared, and where the researcher makes every effort to interpret the data whilst acknowledging those biases. To do this, specific techniques for ensuring trustworthiness are employed, and these are fully explained in Chapter 4.

The researcher undertaking this investigation has had many years of experience as a manager and member of teaching staff in NSAIIs in Australia. Over an extended period, he has served
the sector in a variety of capacities, including as a program manager, a campus principal, a head of college, and a chief executive officer. He has been involved in the recruitment, selection, training and performance management of academic staff members in NSAIs. He has also had experience in seeking to achieve business efficiency, improve quality management systems and raise student satisfaction levels. The researcher is well acquainted with program accreditation processes and requirements in NSAIs, and with the requirements for corporate governance in NSAIs. He has participated in three AUQA audits, each at a different institution, and has been a member of four academic boards. He has also worked as an academic in the university sector.

At the time of the investigation, the researcher was responsible for the management of the campus of an NSAI that was the product of a partnership between a public university and a publicly listed company specialising in the delivery of pathway and foundation higher education programs. In this capacity, he shared responsibility with an academic director from the partner university for implementing assessment moderation processes at the campus concerned.

### 1.5 Organisation of the Thesis

This chapter has sought to establish the focus, scope and significance of the investigation undertaken, and has provided a brief account of the setting. Chapter 2 addresses more fully the nature of assessment moderation, having regard particularly to its role in a quality management framework for the higher education system in Australia. Chapter 3 provides a detailed account of the distinctive features of the non self-accrediting higher education sector in Australia. Chapter 4 explains in detail the methodology employed for the investigation. Chapters 5 and 6 report the findings from the investigation, with Chapter 5 focusing on the first two research questions, and with Chapter 6 focusing on the second two research questions. Chapter 7 concludes the investigation by reporting on important insights from the investigation and by providing a discussion of their implications.
Chapter 2

Assessment Moderation

For the purposes of the present investigation, assessment moderation refers to a coordinated set of practices designed to ensure quality in the development, implementation, marking and review of student assessment tasks. These practices are widely accepted as being fundamental to the quality and integrity of higher education, yet concerns have been raised about the extent and consistency of their application in the Australian higher education system (Stella & Liston, 2008; Winchester, 2007). It is therefore necessary in this chapter to review what assessment moderation involves, how it has evolved over time, and how it relates to developments in the field of student assessment in higher education. The chapter also reports on how Australian higher education institutions, and particularly NSAIs, report publicly through their websites on their adoption of assessment moderation processes. As reported in Chapter 1, there is very little empirical literature on assessment moderation in the context of Australian higher education to draw upon; and there has been only one paper to date (Winchester, 2007) in which the topic has been addressed in the context of the non self-accrediting higher education sector. AUQA and, more recently, TEQSA have, however, underlined the importance of assessment moderation as a process for ensuring the quality of the Australian higher education system.

2.1 Student Assessment

Student assessment is generally understood to have multiple purposes (Morgan, Dunn, O’Reilly & Parry, 2004). According to Hermann, Aschbacher and Winters (1992, p. 2) these include: ‘[to] set standards, create instruction pathways, motivate performance, provide diagnostic feedback, assess/evaluate progress, and communicate progress to others’. Up until about the early 1980s, the prevailing view of student assessment moderation was that its primary role was to distribute student grades according to a predetermined model based upon a hypothetical normal distribution of assessment scores (see, for example, Griffin, 2013; Hughes & Barrie, 2010). This ‘norm-referencing’ approach focused on how well students performed relative to one another, rather than on how well they performed in relation to an explicit statement of standards. Prior to the early 1980s, according to Lawson and Yorke
(2009, p. 7), assessment moderation was seen as a tool that improved consistency in achieving a required grade distribution.

Since the early 1980s, the focus in student assessment has shifted significantly. Pioneering research by scholars such as Dahlgren (1975), Marton and Säljö (1976), Dahlgren and Marton (1978), and Entwistle and Ramsden (1982), as subsequently reported in the landmark publication, *The Experience of Learning* (Marton, Hounsell & Entwistle, 1984), pointed to the importance of assessment tasks in driving student approaches to learning. Marton et al. (1984) reported that how students perceived the assessment task directly influences their approaches to the learning task. A distinction was drawn between surface approaches to learning, where students aim simply to reproduce material for an assessment task, and deep approaches to learning, where students aim at understanding the material being presented to them in greater depth by relating it to existing knowledge. It was found that deep approaches to learning were fostered by assessment designs that required students to build upon their existing cognitive structures by looking for meaning, by relating new knowledge to previous knowledge, by having time to pursue topics of interest, and by linking course content with personal experiences (Pollard & Collins, 2005). In contrast, surface approaches to learning were found to be more likely to occur where the assessment requirements focused mainly on the recall of rote-memorised knowledge, often acquired simply to be reproduced under conditions of high anxiety and then discarded. Student assessment thus came to be seen to involve more purposes than simply ranking students after the completion and grading of assessment tasks.

The importance of formative assessment also became increasingly recognised. Formative student assessment aims to let students know about how well their performance aligns with explicit descriptions of predetermined learning outcomes and associated standard levels of performance (Wiliam, 2002). Black and Wiliam (1998) identified empirically the critical importance of being able to provide students with constructive feedback on formative tasks to assist them when undertaking summative assessment tasks. Formative assessment could be blended into a study program with summative assessment, in order to achieve what Biggs (1996) termed ‘constructive alignment’ between the curriculum, the intended learning outcomes, the approaches to learning and the assessment tasks. Biggs and Tang (2011, p. 11) describe how constructive alignment endeavours to ‘systematically align the teaching/learning activities, as well as the assessment tasks, to the intended learning outcomes’.
With a greater understanding of the importance of assessment as a driver of student learning came an increased appreciation of the importance of specifying in advance the intended learning outcomes for students (Biggs, 1996). An interest in ‘criterion-based’ student assessment initially developed. In criterion-based assessment grading, the purpose was to “become more and more specific” with regard to the learning objectives and outcomes so that subjectivity could be removed and assessment quality increased (Sadler, 2005, p. 181). This approach required the specification in advance of the criteria against which performance on an assessment task would be judged; these criteria were to be made explicit to students in advance (see, for example, Dart & Boulton-Lewis, 1998). A limitation of criterion-based assessment activity was the isolation of learning outcomes, which atomised the learning activities and introduced sources of interpretational subjectivity by the learner and marker (Sadler, 2005). There was a growing realisation, however, that criteria for assessment cannot always be made explicit, thus ‘leaving the standards to be implied or experienced incidentally’ Sadler, 2005, p.190).

It then became widely accepted that it was more effective to specify intended learning outcomes in the form of standards or levels of performance, such as those exemplified in Biggs' SOLO taxonomy (Biggs, 1999). Whether alphanumeric or descriptor based, grades awarded to students at the completion of an assessment task or subject are a representation of the level or standard of learning. Furthermore, assessment grading indicates a level of merit or quality which is directly associated with judgments relative to an individual student’s work, cohorts of students, academic programs or qualifications and institutions (Sadler, 2009). A ‘standards-based’ approach to student assessment and grading thus became dominant in the relevant literature. This standards-based approach to student assessment has been widely endorsed and adopted in the Australian higher education sector, as may be seen from institutional student assessment policies. Griffith University (2015, p. 5), for example, refers to: ‘setting student achievement standards, ensuring judgements of student performance are consistent with those standards and certifying students’ achievements against those standards’ in its student assessment policy. In similar vein, the Macquarie University assessment policy, as published on its website, refers to: ‘Standards based assessment will be used … There will be no predetermined or ideal distribution of grades across a student cohort (i.e. norm referencing)’ (Macquarie University, 2015).
A standards-based approach to assessing student performance is best achieved through a constructive alignment between the intended learning outcomes, the student learning experiences, including the relevant curriculum, and the way in which the attainment of the learning outcomes is assessed. As Burton (2006) explains, using a standards-based approach to student assessment has implications for the setting of intended learning outcomes, the design and content of the curriculum, the development of teaching and learning resources, the formulation of rubrics for marking, and the provision of meaningful performance-related feedback to students. For the purposes of achieving intended learning outcomes, each element is connected to and mutually dependent upon all other elements. A ‘standards-based’ approach to student assessment has, in common with constructive alignment, the following characteristics: student assessment is considered to be integral to the design of a unit of study; student assessment is meant to focus on the advancement of understanding; and student assessment should be fair, transparent and based on merit. Within a ‘standards-based’ approach, it is necessary to explicate to learners the predetermined standards of performance, to constructively align them with the curriculum, and then to align them with the processes employed to assess the student’s level of performance.

Contemporary student assessment methods have been strongly impacted upon by the discoveries made since the mid-1970s regarding both the nature of student approaches to learning and the effects of student assessment frameworks on these approaches. As Boud and Falkichov (2005, p. 35) argue, there has been: ‘[the] flourishing of new assessment practices designed to overcome the limitations of traditional unseen tests and examinations to address a much wider range of learning outcomes.’ Most recently, there has been the development of a more diverse range of student assessment instruments and formats. According to the OECD (2013), assessment instruments and formats should ideally include presentations, debates, quizzes, e-portfolios, internet wikis, online forums, blogs and reflective journals. Conceptually, however, the framework for these instruments and formats remains one of ‘standards-based’ assessment.

2.2 Standards-based Assessment and Assessment Moderation

The transition from norm-based to standards-based assessment, and then to assessment moderation, has been an evolutionary process. As Dressel (1957, p.6) stated, a grade is “an
inadequate report of an inaccurate judgment by a biased and variable judge of the extent to which a student has attained an undefined level of mastery of an unknown proportion of an indefinite amount of material.” Inconsistency in the grading of student assessments and the awarding of grades could be managed through a ‘social moderation’ process where academics from different schools would meet to evaluate samples of student assessment submissions and, through discussion and negotiation, determine the standards that should apply to grading (Linn, 1993). The ‘social moderation process’ addresses the subjectivity and qualitative judgment by individual academics in the evaluation of a student’s learning, with much of the evaluative process being determined by tacit knowledge (Sadler, 1987). The issue at an individual student level becomes more complex at a cohort and institutional level when there is inconsistency in the application of grading standards between markers or assessors. This problem has long been an acknowledged issue for all institutions and higher education systems (Sadler, 2012). As higher education systems, curricula and qualifications nationalised, there was increasing demand from stakeholders for standards-based assessment and moderation, the delivery of quality learning along with explicit standards and quality management processes. An outcome of these environmental changes has been an increasing priority placed upon quality standards, objective academic judgment and moderation processes (Klenowski and Wyatt-Smith, 2012).

There is globally an increasing emphasis being placed upon the importance of student assessment in higher education institutions (Tremblay, Lalancette & Roseveare, 2012). As higher education has moved from ‘elite’ to ‘mass’, and in certain countries to ‘universal’, there are more stakeholders with an interest in the quality of student learning and assessment. In an environment of increasing scrutiny and accountability, higher education institutions are being required to provide evidence of their teaching and learning standards. Key stakeholders, including students, employers, government and industry, are demanding that students achieve the threshold learning standards associated with particular qualifications (Watty et al., 2014). In reflection of this trend, the Australian higher education system has been evaluating and implementing quality management processes for teaching and learning (Bradley, 2008). More recently, an emphasis has been placed on ensuring that assessment outcomes and learning standards are valid, reliable and comparable across institutions and the nation (Krause et al., 2014).
Tuovinen et al. (2014) identified the increasing interest and importance of assessment moderation as a quality management process in the Australian higher education system. Using Bloxham and Boyd’s (2007) model as the foundation, they investigated four non self-accrediting institutions, requiring interviews with 21 members of academic staff. Of interest to them were the assessment moderation and associated benchmarking processes employed. In general, they found that assessment moderation as a quality management process was poorly understood at the institutional, departmental and individual staff member levels.

Approaches to assessment moderation processes have partly evolved in response to research-based insights about the effectiveness of different approaches to student assessment. According to Hughes (2008, p. 1), a comprehensive assessment moderation process now requires the provision of institutional guidance about assessment standards to all stakeholders in the assessment process. According to Morgan et al. (2004, p. 55), ‘assessment moderation must comprise a comprehensive process for achieving clarity and consistency in the documentation of assessment criteria.’ According to the Queensland Studies Authority (2010, p. 6), assessment moderation must ensure that: ‘students who take the same subject with different academic staff members, or at different institutions, and who attain the same standard[s], will be awarded the same grade.’ These conceptions of assessment moderation have in common a commitment to a contemporary ‘standards-based’ approach to student assessment.

All Australian higher education institutions now routinely express this same commitment, but translating the commitment into a uniform set of assessment moderation processes within a strategic and sustainable framework is not straightforward. Adie, Lloyd and Beutel (2013) claim that assessment moderation remains poorly understood across the higher education system in Australia and is not being effectively implemented. In this vein, Mahmud and Sanderson (2011, p. 1) report the existence of: ‘very different concepts of moderation, and attitudes towards it, across the Australian universities.’ Further, Sadler (2013, p. 1) reports that processes for achieving consistency across and within institutions in the grading of assessment tasks to achieve defined academic standards are ‘poorly understood and can vary widely from assessor to assessor’. The most commonly employed forms of grading of assessment tasks make use of numerical scales. Unfortunately, numerical scales, while possibly being employed only to provide a notional indicator of performance at a certain
level, do tend to encourage the revival of a ‘norm-referencing’ perspective on the grading of student assessment tasks.

2.3 Models of Assessment Moderation

Various attempts have been made to reconceptualise the role of assessment moderation in assuring quality standards in higher education, in terms of both changing conceptions of the purpose of student assessment and the increasing diversity of student assessment formats. Initially, Harlen (1994) proposed a two-stage model of assessment moderation, involving ‘quality control’ and ‘quality assurance’. Quality control is generally implemented following the completion of an assessment task. It typically involves the inspection of samples of graded responses and the use of a moderation process whereby markers review the student performance standards identified and scale grades. Quality assurance is generally implemented prior to an assessment task being administered by focusing on aligning the assessment task requirements with the expected learning outcomes, together with comparing and contrasting a selected subset of marked work from the various markers in the subject. This latter process is aimed at achieving consistency between markers in terms of their understanding of the performance criteria and their application of these criteria in grading student submissions. For quality assurance purposes, markers may also be encouraged to review and discuss grades awarded for prior assessment tasks, or to discuss processes for moderating group assessment requirements.

Maxwell (2002) extended Harlen’s (1994) model, identifying a further stage of assessment moderation concerned with ‘quality monitoring’, which refers to processes of continuous review and improvement for the purpose of introducing an element of reflective evaluation into the assessment moderation process. Quality monitoring typically involves the review of assessment outcomes, the delegation of authority for assessment moderation, and the appraisal of current assessment processes to identify strengths and potential areas for improvement.

Further development of Harlen’s model occurred with the publication of a five-stage model of assessment moderation by Oliver et al. (2008). They proposed two additional stages of assessment moderation. One concerned communication, including communication with
students about assessment criteria and the nature of assessment tasks, and communication between markers for the purposes of identifying a consistent approach to the grading of completed tasks. The other stage concerned *feedback*, in particular the provision of formative feedback to students on their learning progress during a unit of study. As depicted in Figure 2.1, the model proposed the following stages: assessment design; communication with students concerning the assessment criteria, as these relate to expected learning outcomes; implementation of the marking process; analysis of results from the marking process; and the provision of comprehensive feedback to students, who, as key stakeholders in the learning process, were seen to be entitled to be well informed not only about their own performance but also about the effectiveness of the whole of the assessment process.

**Figure 2.1 Assessment Moderation Cycle**

![Assessment Moderation Cycle](image)

(Oliver et al., 2008)

Coinciding with these developments in Australia, progress was also being made in relation to assessment moderation frameworks in the United Kingdom. The Quality Assurance Agency (QAA) for Higher Education, which was established in 1997 to maintain standards and improve quality in the higher education system in the United Kingdom, sought to play a
leading role in introducing policy initiatives focused on improving the quality of teaching and learning in higher education, and on achieving consistency across the system in terms of maintaining academic standards. Benchmarking was identified as the preferred means for achieving these outcomes (Jackson, 2002, p. 130). By 2007, the QAA had begun to exert considerable pressure on institutions in the higher education system in the UK to comply with their own internal institutional quality assurance requirements (Gallagher, 2010; Great Britain: Parliament: House of Commons: Education Skills Committee, 2007). In this context, Bloxham and Boyd (2007) developed an assessment moderation model that could be implemented by all higher education institutions across the UK. As shown in Figure 2.2, this model included the following phases: assessment tasks are undertaken by the respective subject assessor or course coordinator; each student assessment instrument is then reviewed and critiqued by an academic peer prior to being published as part of the subject resources; the student then completes the assessment task, which is given a provisional grade by the subject coordinator; the provisional grade is second-marked by a colleague or double-marked; grades are then compared and a final result determined; prior to the ratification of final grades, their consistency with results in previous teaching sessions are reviewed and evaluated by a colleague external to the subject; and, finally, the distribution pattern on the results is reviewed by an examination committee that subsequently approves them. Upon ratification of the final results, a review process is completed, thereby leading to recommendations for future assessment tasks in the subject.
In 2007, the ALTC initiated a project to develop a model of assessment moderation for the Australian higher education system, especially transnational institutions. The project was led by a team of academics and professional staff from the University of South Australia, with support from colleagues at Curtin University, Southern Cross University and two of the Taylor’s University Colleges. Referred to as the ‘Moderation for Fair Assessment in Transnational Learning and Teaching Project’, the initiative required the collection of interview and documentary data from across eight site locations. From this study a new
model, based on Bloxham and Boyd’s model, of assessment moderation was proposed. This model, as documented by Mahmud and Sanderson (2011), is presented in Figure 2.3.

Figure 2.3 Assessment Moderation Flowchart

The model documented by Mahmud and Sanderson (2011) further refined the actions into three phases. As may be seen in Figure 2.3, Phase 1 required three activities: designing the assessment task; scrutiny by colleagues or subject coordinators of the assessment task; and communication of the assessment criteria to markers and students at the beginning of the
study session. Building on Bloxham and Boyd’s model, Mahmud and Sanderson included that there should be ‘Communication of assessment criteria and marking scheme to the markers and students’. Phase 2, which corresponded with the Bloxham and Boyd model, involved: second and blind marking; the comparison of grades and results; intra-subject moderation, the review of the consistency of grades from the same subject at different time periods; and a review by an external examiner. Phase 3 concerned the process of ratification of the final student grades by an examination or assessment board, the release of marks and grades to students, and the review of the entire assessment process in preparation for future study periods. Mahmud and Sanderson (2011) recommended an additional action of ‘Marks/grades released to students’ prior to a review of the assessment activities by the examination board in conjunction with the examiner.

The model utilised the processes proposed in Bloxham and Boyd’s (2007) model, including its adoption of three phases, and its interpretation of assessment moderation as being an iterative process, with each phase involving the implementation of certain concrete actions as part of an integrated and comprehensive system. The successful completion of each action was seen to provide the basis for complying with established standards of excellence in student assessment practice, and for eliminating the need to return to any previous action or phase in the flowchart. Thus, each action within each phase presents an opportunity to achieve standard outcomes that are consistent over time, regardless of the setting.

Mahmud and Sanderson’s (2011) model, which was endorsed by the Commonwealth Government’s Office of Learning and Teaching after it replaced the ALTC, is considered to provide a reference point for higher education providers in Australia for how they should implement assessment moderation at an institutional level. The model is, therefore, an important point of reference for the present investigation. It integrates important elements from other models, including quality control and quality assurance (Harlen, 1994), continuous improvement (Maxwell, 2002), and communication and feedback (Oliver et al., 2008).

The model’s implementation at an institutional level requires strong commitment and sustained leadership. Initially, an institution must determine the objectives of its assessment moderation program, which may range from meeting regulatory requirements, to improving
the quality of student learning outcomes, to embedding an assessment moderation framework as an integral part of the institutional quality management process. Guidelines and policies for staff members and relevant stakeholders must then be developed and promulgated, with resources provided to support professional development programs for academic staff. The institution’s student assessment moderation framework must also be systematically designed, implemented and reviewed, requiring the collaboration and commitment of all members of academic staff. In pointing to these parameters, Hughes (2008, p. 2) referred to the importance of ‘the collaborative efforts of teachers, leaders and administrators working across an institution’s various organisational levels .... Each group has a specific role to play and specific responsibilities.’

One of the major challenges in the implementation of any model is that assessment moderation, if it is to be effectively implemented at an institutional level, is a resource-intensive activity. It requires investment by the institution in its academic and administrative staff functions so that they are able to collaborate in carrying out the phases of implementation of the assessment moderation process. It also requires a widespread appreciation of the importance of assessment moderation in safeguarding the academic standards of a higher education institution.

2.4 Approaches to Assessment Moderation

A broad review of how assessment moderation is embraced and implemented across the Australian higher education system suggests that there are inconsistencies in terms of how assessment moderation is understood. While the Mahmud and Sanderson (2011) model is widely accepted to be an authoritative reference point, TEQSA, the body now required to ensure that institutions across the system comply with standards approved by the Commonwealth Government, describes assessment moderation in a way that is different from that of the ALTC. The ALTC referred to assessment moderation in terms of ‘consistency, comparability, quality control, equivalence, fairness, and quality assurance’ (ALTC, 2010a, p. 1). TEQSA, in contrast, uses the more positivist language of educational measurement, referring to assessment moderation in terms of ‘the validity and reliability of assessment tasks, criteria and standards’ (TEQSA, 2014b). The reasons for TEQSA adopting the language of science to promote its perspective are not clear, but, at an institutional level, the discrepancy
between what the Office of Learning and Teaching now endorses, that is, Mahmud and Sanderson’s (2011) model of assessment moderation, and the TEQSA interpretation of the model, gives rise to level of confusion.

It is also evident that, though universities in Australia readily proclaim their commitment to assessment moderation, the ways in which they interpret the concept are sometimes quite different. La Trobe University, for example, emphasises the importance of grade consistency where there are two or more markers for a cohort, stating that: ‘moderation of assessment is to be conducted in situations where there is more than one person marking assessment in any subject and/or where there is more than one instance (distinct offering) of a subject’ (La Trobe University, 2014). Other universities make statements that are much more general in nature and refer to assessment moderation as a process for assuring validity and reliability. The University of Western Australia refers, for example, to moderation in terms of ensuring that ‘assessment procedures and practices are valid and reliable’ (University of Western Australia, 2015, p. 4); and the University of Technology, Sydney states that: ‘Any moderation of results within a subject will be based on comparison of the standards of achievement of the stated criteria for the task across different markers. Where moderation is used, this will be indicated in the subject outline and, wherever possible, completed before marks/grades are released to students.’ (University of Technology Sydney, 2015, p. 4). Coming closest to the language of the ALTC model is the University of Southern Queensland’s requirement that each course should have a moderator whose role is to: ‘review and endorse the assessment scheme’, ‘review and endorse each summative assessment item’, and ‘verify and endorse the final grades allocated to students’ (University of Southern Queensland, 2015, p. 1 and 2). In general, and as Brown (2010, p. 6) also observed, Australian universities appear to be more focused on the use of assessment moderation to achieve validity, reliability and consistency than they are on assessment moderation as a basis for achieving consistency in the articulation of intended student learning outcomes, the management of student grades, and the attainment of agreed graduate attributes over time and between different locations.

In the case of the NSAIs, it may be generally claimed that most seem to interpret assessment moderation as a process implemented after an assessment task has been administered, and not beforehand. Their interpretation, therefore, is consistent with Harlen’s (1994) definition of quality control. More striking, though, is that so few NSAIs document publicly their
approaches to assessment moderation. A search of 138 institutional websites in June 2014 revealed only 33 that made any reference to assessment moderation. Among those which did so, the references were embedded in institutional statements about student assessment policies, such as that: ‘Moderation is undertaken to ensure assessment activities have been designed and implemented appropriately and that students and staff can be confident that the results provided are valid and reliable’ (Australian College of Physical Education, 2014, p. 1). In several institutions, moderation is referred to as: ‘discussion amongst markers about the interpretation of criteria’ (Nan Tien College, 2015); as a process for achieving an ‘appropriate degree of fairness and consistency in grades’ (Alphicarus College, 2015); and as ‘consistency in the evaluation of student grades’ (Endeavour College, 2014). Other institutions refer simply to the importance of validity, fairness and consistency. Examples include: ‘ensures … assessment tasks and marking are valid and reliable’ (Think Education, 2014, p. 1); and ‘to ensure that assessment tasks and marking are valid and reliable. Essentially, it is a checking process’ (Top Education, 2015, p. 1).

There is a diversity of understandings of assessment moderation as a quality management process in the NSAI sector. Tuovinen et al. (2014, p 23 & 24), using the Bloxham and Boyd (2007) model as the foundation for understanding assessment moderation, investigated four non self-accrediting institutions, involving 21 academic staff members in the understanding and application of assessment moderation and associated benchmarking processes. The objectives of assessment moderation were found to be consistent across all four institutions. These were, in order of priority: (a) to establish fairness and equity in assessment; (b) to support quality assurance and accountability; (c) to enable comparability of assessment across inter-institutional boundaries; and (d) to provide developmental value through learning and research processes aimed at improving assessment. However, there were numerous contradictions and disparities reported. Assessment moderation as a quality management process was poorly understood at many levels, and personal understandings of the concept were reported to guide the actions of individual members of staff. Though the researchers do not generalise to the whole of the NSAI sector, it is not improbable, given the information available from other sources, that their findings do summarise the national situation. It is equally the case that the deficiencies they describe are instances of practices that should not be happening in the name of moderation across the NSAI system as a whole.
2.5 Regulating Assessment Moderation

Since the early 2000s, there have been repeated national affirmations of the importance of assessment moderation to the preservation and advancement of quality in the Australian higher education system. Featuring prominently among these was a declaration in 2002 by the then Commonwealth Minister of Education, Science and Training, Dr Brendan Nelson, that:

> If articulated academic standards are to be maintained, academics need to share a common understanding of the standards, and fairly and consistently assess student achievement in terms of the standards. To ensure such a common understanding, some form of moderation of assessment is necessary. Moderation is a systematic approach to ensuring consistency and comparability of assessment with standards and evaluation of performance. It may be conducted as an internal exercise within a subject, a course, or an institution, or as an external exercise through a range of strategies including the use of external examiners or cross-institutional panels (Nelson, 2002, p. 28).

AUQA, at the time the Commonwealth Government’s agency responsible for conducting periodic institutional audits of higher education institutions, also identified assessment moderation as providing a foundation for the achievement of a continuous cycle of institutional quality improvement. In 2006, it referred to assessment moderation as ‘a critical element in the process for achieving unit and course equivalence’ (AUQA, 2006b, p. 36). AUQA’s influence in coercing individual higher education institutions to take responsibility for the implementation of assessment moderation was considerable. Over the period from 2002 to 2012, AUQA published 72 university audits. Audit reports produced by AUQA appraised institutional performance according to three descriptors: ‘commendations’ for those policies and procedures that demonstrated the institution was focused on achieving its goals or had implemented initiatives that would lead to the achievement of a stated goal; ‘affirmations’ for those policies and procedures that the institution recognised as being required and for which plans for their introduction were evidenced; and ‘recommendations’ for those policies and procedures that were in need of development and implementation because of their importance in mitigating risk to the institution.

In its first round of university audit reports, completed over the period from 2001 to 2006, AUQA frequently expressed concern that assessment moderation was being inconsistently implemented as a quality management process. Assessment moderation implementation tended, in many instances, to rely on the commitment of a dedicated group of staff members,
and that, as Stella and Liston (2008) identified, an *ad hoc* approach to its implementation was widely evident. In the audit report for the University of Southern Queensland, for example, AUQA recommended that: ‘USQ develop formal Moderation Guidelines ... for application across all modes and study options’ (AUQA, 2002b, p. 9); while in the audit report for the University of Ballarat, AUQA recommended that the academic board should: ‘develop moderation protocols for use in arrangements where UB courses are being delivered off-campus by external partners and ensure these protocols are appropriately applied’ (AUQA, 2002a, p. 12). References were also made in AUQA audits to there being ‘no consistent approaches to moderation … reducing its effectiveness as a means of quality control’ (AUQA, 2002b, p. 21), ‘institutional assessment moderation processes needing improvement in order to improve their effectiveness’ (AUQA, 2006b, p. 26), and ‘the need for assessment moderation processes to be more highly valued as a standard component of institutional quality management’ (AUQA, 2006a, p. 36). AUQA also commended individual institutions for their approach to the adoption of assessment moderation processes. Charles Sturt University, for example, was reported by AUQA as an institution where the academic staff ‘place a great deal of significance on this [moderation] activity’ (AUQA, 2004, p. 44), and where assessment moderation processes provided a strong basis for maintaining academic standards over multiple campuses and modes of delivery.

By 2012, a further 36 university audit reports were completed by AUQA. The tone of these reports suggested that, on balance, AUQA considered that there had been an improvement in the extent of commitment by universities to recognising the importance of assessment moderation. The number of ‘commendations’ and ‘affirmations’ for effective institutional practice regarding assessment moderation increased, compared with the earlier period, and the number of ‘recommendations’ for improvements dropped markedly. Universities appeared to have become more committed to and successful at implementing assessment moderation processes in support of their quality management policies and practices.

Though AUQA undertook some audits of individual NSAIIs before 2006, most of its auditing activity in this sector took place between 2006 and 2011. By 2012, a total of 55 audit reports for individual NSAIIs had been published. In 40 of these reports, there was an explicit reference to assessment moderation, which reflects a high level of scrutiny by AUQA of the adoption of assessment moderation by the sector. An examination of AUQA’s comments
regarding assessment moderation points to a great deal of variation within the sector in terms of institutional commitment to, and success in, implementing assessment moderation processes. There were 11 ‘commendations’ and three ‘affirmations’ awarded in recognition of successful assessment moderation activity, but there were also 14 ‘recommendations’ made concerning the need for more attention to be given to assessment moderation processes within institutions. The extent of institutional variation within the NSAI sector, and more broadly across the higher education system, was clearly of concern to AUQA. In 2008, it reported in one of its institutional audit reports that there was a need for ‘a nation-wide system of moderation of student results for … different modes and locations’ (AUQA, 2008b, p. 5).

AUQA made other important observations about the implementation of assessment moderation processes across the higher education system. Of special concern in many audit reports was the extent of variation within individual higher education institutions in their level of commitment to and skill in implementing assessment moderation processes. Comments along the lines that ‘the Panel heard from staff that only about half those interviewed had moderation in their units’ (AUQA, 2006a, p. 9), and ‘the practice of moderation is highly variable, and that the level of contact with the subject coordinators is very low.’ (AUQA, 2006b, p. 39), were not uncommon. The AUQA audits pointed strongly to the need for better coordination and management of institutional assessment moderation frameworks. By 2011, individual institutions were being told bluntly that they needed to develop an institutional approach to, or a framework for, assessment moderation as expressed in the Audit report for Charles Darwin University: ‘This is a problem that goes beyond staff expertise and professional development and involves also assessment protocols and approaches to moderation. (AUQA, 2011, p. 27).

2.6 Constraints on Assessment Moderation

There are many practical challenges associated with the implementation of assessment moderation at the institutional level. Not the least of these is the extent to which institutions acknowledge and make available the time required by academic staff members to implement the range of integrated processes required for an effective assessment moderation framework.
2.6.1 Limited exemplars

In the absence of a national approach to its implementation in the higher education system in Australia, assessment moderation remains very much a matter of individual institutional responsibility. Benchmarking of institutional assessment moderation approaches is limited. As the Committee of Review of the Australian higher education system observed in its report: ‘There is evidence that institutions are moving towards more external validation of standards … between individual institutions and between some Australian and overseas universities, but these are not yet well-developed’ (Bradley, Noonan, Nugent & Scales, 2008a, p. 131). AUQA’s submission to the Committee of Review argued that a comprehensive standards check required a more systemic standards infrastructure (Bradley, Noonan, Nugent & Scales, 2008b). AUQA also proposed that Australia needed something like the United Kingdom’s subject benchmark system, together with a more systematic external assessment moderation process. The AUQA audit experience was that assessment moderation frameworks were being too loosely implemented and that academic standards for particular fields of knowledge needed to be identified and agreed across the sector.

In the absence of a national approach, benchmarking processes appear to have been adopted by some clusters of higher education institutions to assist with the development of their assessment moderation policies. One example of cross-institutional collaboration is the Quality Verification System that Australia’s eight leading research universities have agreed to adopt. This system requires the individual institutions to undertake reviews of the ways in which grades are awarded, with these approaches ‘benchmarked and verified for a sample cohort of students’ (Gallagher, 2010, p. 8). However, the Quality Verification System is, according to Gallagher (2010, p. 8), concerned only with the ‘appropriateness of grades awarded to a sample of student assessment after their results have been published’, and hence does not address all of the integrated processes of the ALTC model.

In other higher education systems, system-wide approaches to assessment moderation appear to be more common. The Tuning Project, for example, which is now being adopted by the United States, the United Kingdom and some countries in the European Union, calls for evidence of a commitment to external reviews of examinations, assessment moderation and
the provision of independent feedback on student learning outcomes (Bianculli and Hoffmann, 2015).

2.6.2 Resource constraints

The cost-effectiveness of assessment moderation has never been convincingly established, resulting in a level of institutional cautiousness about what should be the appropriate investment to make in its implementation. There is little doubt that, as Parker (2012, p. 248) has observed, ‘higher education managers have become much more focused on revenue generation and cost efficiency as the higher education system has become much more commercialised’, and that, as Brown (2011, p. 24) has observed, ‘market competition makes institution[s] more aware of their costs’. The decision to invest in an institutional assessment moderation framework is necessarily a matter for consideration in the context of an institution’s cost management strategy. In this regard, as Wimhurst, Wortley, Bates and Allard (2006, p. 11) observe, ‘resource and budgetary “panics” across institutions have a tendency to undermine positive pedagogical and assessment practices’.

A development of particular importance in the Australian higher education system is the increase in the extent of institutional reliance on casual academic staff appointments. Lane and Hare (2014, p. 1) report that, by 2013, casual academic staff appointments accounted for more than 18 per cent of all academic staff appointments compared with 15 per cent in 2000. Making casual academic staff appointments allows higher education institutions to manage their operational costs more tightly, as is necessary in the increasingly competitive environment of the Australian higher education system. Parker (2012, p. 261) reports that the employment of casual academic staff members provides ‘cost efficiency strategies’ that include higher student-to-staff ratios. These efficiencies invariably result from ensuring that casual academic staff members are employed solely to provide teaching and student assessment services, and so their engagement in quality management duties, such as those required for assessment moderation, is usually precluded (Percy et al., 2008).

NSAIs in Australia, because of their exclusive focus on teaching, and because they are also highly commercialised, tend to rely heavily on casual academic staff appointments. In their research into Australian Non-University Higher Education Providers (NUHEP), Robinson
and Hougaz (2013, p. 20) detailed the extent to which ‘Very few members of academic staff employed by NUHEPs are on long-term contracts, and therefore the health of NUHEPs is dependent on the employment of casual labour’. Casual academic staff appointments are widely identified as forming a ‘diverse and high-turnover workforce’ (May, Strachan & Peetz, 2013, p. 20). For reasons of continuity as well as for reasons of cost management, assigning additional responsibilities to them in the form of duties related to the management of assessment moderation, therefore, is likely to be avoided (May et al., 2013). Responsibility for ensuring the institutional implementation of assessment moderation processes then falls more to a core of full-time academic staff members who may already carry a wide range of management responsibilities within their institutions.

2.6.3 Institutional commitment

The effectiveness of the implementation of an institutional assessment moderation framework is generally reliant upon a strong and widely shared commitment from all levels of academic appointment. Though key individuals may have specific roles to play, all members of staff at a higher education institution need to be familiar with and supportive of the value of the framework. As Nicoll (2013, p. 1), the then Chief Commissioner of TEQSA, argued, quality management for a higher education system ‘is a process requiring understanding and commitment from every institution and individual staff member’. This view resonates with Stella and Liston’s (2008) conclusion from their review of assessment moderation practices. They observed that assessment moderation in Australian universities ‘had been inconsistently undertaken, and the management of the overall process ... had become lax’ (Stella & Liston, 2008, p. 58).

The literature on assessment moderation prescribes basic measures that individual higher education institutions can adopt to improve the quality of their assessment moderation practices. Hughes (2008, p. 2) has identified, for example, the lack of a ‘shared understanding of commonly used terms’, and of ‘preparation for teaching or assessment of many academic coordinators’. These factors can seriously impede the development of an effective institution-wide implementation of assessment moderation. Stella and Liston (2008, p. 56) have also emphasised the importance of the proper ‘delegation of responsibilities within higher education institutions for the development of policies and for the exercise of accountabilities’
with regard to assessment moderation. Sadler (1998 and 2005), a longstanding proponent of assessment moderation, has referred to the importance of higher education institutions communicating clearly with their academic staff members and with their students about institutional student assessment policies and processes. Anderson, Johnson and Milligan (2000, p. 24) observed, however, there was a strong tendency among academic staff to ‘exercise judgement about academic standards based on implicit standards that have been formed on the basis of their own experience’.

### 2.7 Concluding Remarks

This chapter has shown assessment moderation to be a significant quality management process intended to maintain academic standards and secure the reputation of the Australian higher education system. The model of assessment moderation developed by Bloxham and Boyd, and further developed by Mahmud and Sanderson (2011) provides a standard reference point for the system. AUQA played an important role in making individual higher education institutions attend to the development of institutional assessment moderation frameworks, but, in the absence of a national framework, there remains a heavy reliance within the higher education system on individual institutional interpretations of what assessment moderation requires and how it should be implemented. Though evidence on the matter has not yet been systematically collected, it does appear that the extent of variation in institutional frameworks and processes may be greater in the NSAI sector than in the university sector, partly for historical reasons. This variation may relate to the heavy dependence on casual academic staff appointments in the NSAI sector, but there may also be other influences at work.
Chapter 3

The Non Self-Accrediting Higher Education Sector

This chapter provides an overview of the non self-accrediting higher education sector. It pays attention to the recent growth of the sector, the sector's market structure, and the challenges faced by the sector. In 2005, domestic students enrolled in approved programs in NSAIs became eligible to access FEE-HELP loans from the Commonwealth Government. Since then, the sector has expanded quite strongly. Access to the FEE-HELP scheme boosted demand for the kinds of programs offered by the sector. It also meant, however, that NSAIs offering accredited programs for the purposes of access to FEE-HELP became obligated to comply with Commonwealth Government quality assurance requirements, including the requirement to implement assessment moderation processes.

3.1 Recent Growth of the Sector

Universities continue to dominate the higher education system in Australia. They have traditionally enjoyed a high level of academic autonomy, balanced with responsibility, that includes the right to accredit their own academic programs. Over the period from 1967 to 1988, their dominance was challenged by a non self-accrediting higher education sector comprising publicly funded colleges of advanced education (CAEs). By the late 1970s, the CAE sector had become as large as the university sector. Then, in 1989, as part of a wave of reforms to the national higher education system, CAEs were converted to universities in their own right, or they were merged with existing universities. Only a small number of non self-accrediting higher education institutions remained, mainly in the form of profession-specific training institutes and theological colleges.

During the 1990s, a non self-accrediting higher education sector began to revive. Watson (2000, p. 5) records that, by 1999, there were 74 non self-accrediting higher education institutions in existence, with a total enrolment of 22,711 students. These institutions included training institutes established by professional associations (accounting for 10,674 students), theological colleges (accounting for 5,313 students) and niche market operators (accounting for 6,724 students). Relatively few of these institutions were publicly owned, and, according
to Watson (2000, p. 13), over two-thirds of them had offered their first higher education program during the 1990s. State and territory authorities were responsible for approving their establishment and for accrediting their programs.

The main growth in the sector has occurred since 2005, following implementation of the *Higher Education Support Act 2003*. In 2005, access to FEE-HELP loans became a possibility for domestic students enrolled at registered higher education providers. There were 33 non self-accrediting higher education institutions, with a total enrolment of 11,400 students, formally recognised by the Commonwealth as higher education providers at this time. By 2013, the number of formally recognised institutions in the sector had jumped to 138, with an enrolment of over 81,000 students, representing about 8 per cent of all higher education students (DET, 2014d).

The sector continues to comprise mainly small, privately owned institutions. In 2013, only three institutions in the sector had over 4,000 enrolments, and over one-half of all institutions in the sector had fewer than 500 enrolments. Figures 3.1 and 3.2 provide an overview of the growth since 2005 in, respectively, the number of institutions in the sector formally recognised as higher education providers, and the number of students enrolled at these institutions. Figure 3.1 shows a slight decline from 2010 to 2011 in the number of formally recognised institutions in the sector. Since 2010, the number of institutions in the sector has stabilised. Figure 3.2 shows strong growth in enrolments in the formally recognised institutions in the sector up to 2010, followed by slower growth up until 2012. In 2013, there was another burst of strong growth.
Figure 3.1 Formally Recognised Non Self-accrediting Higher Education Providers 2005-2013


Figure 3.2 Enrolments at Formally Recognised Non Self-accrediting Higher Education Providers 2005-2013

3.2 Context for the Sector’s Growth

The growth since the early 1990s of a non self-accrediting higher education sector needs to be seen in the context of Australia's higher education system more broadly. Since the early 1980s, there has been a marked increase in participation rates in higher education among young people in Australia. Whereas 12 per cent of young people aged 17 to 19 years of age participated in higher education in 1982, the proportion had increased to 26 per cent by 2010 (Norton, Sonnemann & Cherastidtham, 2013). Accompanying this growth has been a change in young people’s perceptions of what higher education represents. According to Norton, Sonnemann and Cherastidtham (2013, p. 5), neither young people nor their parents any longer regard higher education as being the preserve of an elite. Instead, higher education has come to be seen as necessary for accessing secure future employment. This change in outlook has increased the acceptance of the non self-accrediting higher education sector, where the focus of most study programs is applied and vocational. These kinds of programs are attractive to an increasing number of young people whose interests in higher education are typically vocationally focused.

Another significant change in the national sector since the 1980s has been a political movement to shift the cost of higher education from Government to consumers. The reintroduction of tuition fees in 1989 for programs offered by public universities marked a transition point in this regard. During the period from 1996 to 2007, when a centre-right Liberal/National Coalition Party formed the National Government, a strong commitment to the extension of a user-pays principle was implemented (Wheelahan, 2008, p. 13). Domestic students were permitted to enrol in undergraduate programs on a full-fee paying basis; the value of the Commonwealth’s operating grants to public universities was reduced; and all higher education institutions were given increased incentives to recruit full-fee paying international students. At the same time, encouragement was given to the development of a private higher education sector by extending access to FEE-HELP loans to domestic students enrolled in accredited programs offered by the sector. These initiatives were unambiguously ideological, and were intended to ease pressure on the public purse and to favour the private provision of higher education.
Yet another contextual element has been the Commonwealth Government's increasing efforts to control the provision of higher education. Though the Australian Constitution makes the states and territories responsible for education, the Commonwealth has for a long time sought to exercise more control of the higher education sector. This tendency began with a post-war training scheme in the 1940s that provided scholarships to returned members of the armed services who were willing to undertake university studies. Then, in 1951, the Commonwealth began making small grants directly to universities and it introduced a Commonwealth Scholarship scheme for university students. The scholarship scheme facilitated the growth of Australian higher education enrolments. By the mid-1950’s, however, concern was being reported about overcrowding, limited infrastructure and poor research performance in Australian universities (Murray, Clunies Ross, Morris, Reid & Richards, 1957). In response, the Commonwealth Government raised its financial commitment in support of universities, particularly by making significant financial investments in the establishment of new universities in the suburbs of the larger state capital cities. Demand for higher education continued to expand through the 1960’s and led to the establishment of a College of Advanced Education (CAE) sector in 1967 that was intended to provide a less costly and more vocationally applied form of higher education. In 1974, with the states in agreement, the Commonwealth assumed full funding responsibility for the provision of higher education. In 1988, the higher education system was restructured by making all higher education institutions universities (Dawkins, 1988). In 1993, again with the agreement of the states, the Commonwealth Government began funding universities directly, rather than through the member states and territories. With the implementation in 2005 of the Higher Education Support Act 2003, it provided FEE-HELP access by domestic students enrolled at NSAIs, conditional upon compliance with quality standards approved by the Commonwealth Government. In 2011, it required all NSAIs to comply with its quality standards, thereby removing any further role for the states and territories in the accreditation of the programs of these institutions.

In 2005, the implementation of the Higher Education Support Act 2003 brought about a significant change for those NSAIs wishing to provide their domestic students with access to FEE-HELP. By seeking registration as higher education providers under the Commonwealth legislation, these institutions became subject to a stringent set of national quality standards approved by the Commonwealth. More importantly, they became subject to public quality
audits conducted by AUQA. After 2005, AUQA’s influence over the non self-accrediting higher education sector increased dramatically. By 2011, the final year of AUQA audits, AUQA had audited all non self-accrediting higher education providers registered with the Commonwealth as higher education providers.

In 2011, the Commonwealth Government approved new legislation to establish TEQSA, which replaced AUQA. TEQSA was given sole responsibility for the registration and accreditation of all higher education providers in Australia, including both self-accrediting universities and non self-accrediting higher education institutions. To fulfil this role, TEQSA was given both the regulatory responsibilities formerly belonging to the states and territories, and the quality assurance responsibilities formerly belonging to AUQA. TEQSA became the single authority responsible for policing compliance with Commonwealth Government requirements across the higher education system (Wheelahan et al., 2012). Its power far exceeded that of AUQA. Whereas AUQA could only point to deficiencies in the quality assurance processes of higher education institutions, TEQSA had the authority to withdraw an institution's registration if it determined that there was inadequate institutional compliance with designated higher education standards, including provider standards, course accreditation standards, and qualification information standards. In this new environment, all higher education institutions were being required not only to demonstrate quality processes, but also to provide evidence that they met nationally prescribed standards.

### 3.3 Profile of the Sector

TEQSA maintains an Australian Qualifications Register for all higher education providers in Australia. Figure 3.3 provides an overview of the different types of higher education providers recorded on the Register. In February, 2015, there were 172 institutions listed, including 43 that were self-accrediting, and 129 that were NSAIs. The self-accrediting institutions included 40 Australian and two overseas universities, together with one small highly specialised non-university institution. Of the 129 NSAIs, only 87 offered programs approved to enable domestic students to access FEE-HELP (TEQSA, 2015b). These 87 institutions accounted for nearly all of the students enrolled in NSAIs. The remaining 42 institutions were small and mainly concerned with offering niche programs in areas such as in-service professional development, for which FEE-HELP was irrelevant.
There is a two-step national registration and accreditation process for any corporate body seeking to be registered as a higher education institution in Australia. The first step is to apply to TEQSA for registration. This process entails an assessment in terms of fitness and appropriateness to deliver higher education. Matters on which information must be provided include: provider history and standing; proposed corporate and academic governance arrangements; projected financial viability and financial safeguards; measures to assure academic quality and integrity; appropriateness of management systems and human resources; stated responsibilities to students; and adequacy of physical and electronic resources and infrastructure (TEQSA, 2014c). The second step is to apply to TEQSA for accreditation of a proposed set of programs and qualifications. This process requires an assessment of the extent to which the proposed programs comply with the Australian Qualifications Framework (AQF), including expected graduate outcomes for different levels of qualification. Matters on which information must be provided include: proposed admission and articulation pathways;
proposed course development, approval and coordination processes; proposed course delivery methods and structures; expected teaching and learning arrangements; adequacy of teaching and learning resources; intended course review, improvement and discontinuation arrangements; proposed documentation processes for certifying levels of attainment; and any intended arrangements for delivery in a language other than English and for offshore delivery (TEQSA, 2014a).

Upon registration, an institution may apply for its domestic students to be eligible to access FEE-HELP. Some institutions do not take this step because their focus is the provision of industry-related professional accreditation programs for students who would not require eligibility for FEE-HELP. Since 2005, however, the incidence of applications for eligibility to access FEE-HELP has increased. In 2005, there were only 33 providers with FEE-HELP eligibility, accounting for 11,033 students; by 2009, the number had increased to 77 providers, accounting for 62,259 students; and in 2013, there were 90 approved providers, accounting for about 81,000 students (DEST, 2005; DET, 2014d).

The consolidation of registration and accreditation processes under TEQSA in 2012 has increased significantly the extent of regulatory control by the Commonwealth Government over the non self-accrediting higher education sector. Prior to 2012, state and territory authorities, often with different sets of requirements, had limited capacity to take action if a registered provider was found to be non-compliant with their standards. Lane (2010) reports, for example, that once an organisation had been registered and accredited by a state or territory authority, it became very difficult for the state or territory to revoke registration or accreditation at a later date. Under TEQSA, however, any failure to comply with the national standards could potentially be fatal. As Williams and Pillai (2012, p. 293) have observed:

> Failure to register with TEQSA, offering a regulated higher education award without being registered, offering a higher education award other than as a course of study and providing an unaccredited course of study, along with breaching the conditions of registration or accreditation, [have been] made criminal offences.

As may be seen from Figure 3.1, the number of higher education providers with access to FEE-HELP appears to have plateaued since 2010. The non self-accrediting higher education
sector, viewed as an industry, appears to be reaching a stage of ‘maturity’, using Klepper and Graddy’s (1990) classification of industry lifecycles. As illustrated in the second column in Figure 3.4, the details of different conceptions of industry lifecycles and their possible relevance to NSAIs are explained. A ‘mature’ industry is one in which the number of producers stabilises, and there is a drive by producers to improve quality and minimise costs, except among niche providers who have market control over small segments of the industry and are, therefore, able to be price-insensitive. Gort and Klepper (1982), together with Lumpkin and Dess (2001), have proposed similar classifications (see the first and third columns in Figure 3.4). Klepper and Graddy (1990) characterise ‘maturity’ as following an earlier stage, involving ‘shakeout’, in which individual producers strive for more customers (students) and seek to expand their market share, possibly by means of takeovers.

**Figure 3.4 Industry Lifecycles Relevant to the Non Self-accrediting Institution Sector**

<table>
<thead>
<tr>
<th>Stages of non self-accrediting institution industry lifecycle</th>
<th>Characteristics</th>
<th>NSA/ Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>I Introduction</td>
<td>Introduction of product category</td>
<td>Leading up to 2005</td>
</tr>
</tbody>
</table>
|                                                             | Single or few producers | - HESA Act  
|                                                             |                                                              | - 33 institutions  
|                                                             |                                                              | - 71,433 students |
| II Growth                                                   | Increase in consumption | 2005 - 2009 |
|                                                             | Product innovation core to differentiation in the market | - 77 HEP institutions  
|                                                             |                                                              | - 62,259 students |
| III Shakeout                                                | Maximum number of producers | 2010 - 2012 |
|                                                             | Consolidation through acquisition of smaller producers | - 86 HEP institutions  
|                                                             |                                                              | - 53,268 students |
| IV Maturity                                                 | Period of negative entry for producers | 2013 |
|                                                             | Rate of growth of consumption decreases or stabilizes | - 90 HEP institutions  
|                                                             |                                                              | - 81,595 students |
| V Decline                                                   | Drive by producers to improve quality and minimise costs | |
|                                                             | Number of producers stabilizes | |
|                                                             | Economies of scale and or product differentiation are essential for survival | |
|                                                             | Consumption declines and producers exit | |

These lifecycle classifications appear to represent accurately the pattern of development of the non self-accrediting higher education sector in Australia. Klepper and Graddy’s (1990) ‘introduction’ stage may be said to have taken place during the years leading up to 2005. Between 2005 and 2010, a ‘shakeout’ period occurred, with restructuring and rationalisation becoming the focus of attention as NSAIs sought to secure increased market share by expanding and consolidating. During this period, six large conglomerate proprietorships emerged as industry leaders. These were: StudyGroup, Navitas, Think Education, Laureate, Kaplan Education and the Apollo Education Group. By 2014, they accounted for about one-third of all enrolments in the sector (DET, 2014d).

The growth strategies employed by these companies provide an insight into the dynamism of the industry during its 'shakeout' stage. StudyGroup, for example, developed colleges offering niche pathway programs that provided guaranteed articulation to selected universities. It also entered into public-private partnerships (PPPs) with public universities to establish colleges and it bought out smaller NSAIs. Navitas, which in 2014 was a listed company on the Australian Stock Exchange with an annual revenue of $878 million (Navitas, 2015), also expanded by forming partnerships with selected universities for the provision of pathway programs, by entering into a PPP with a large public university in Sydney, and by buying out several small competitors. Think Education, established as recently as 2007, achieved rapid growth by taking over a number of smaller NSAIs. By 2010, when it was purchased by Seek, it had more than 8,000 enrolments. Laureate, Kaplan Education and the Apollo Education Group are all US-based companies that entered the Australian market by buying existing Australian NSAIs. They focus on the provision of pathway programs, and one of them, Laureate, which is listed on the NASDAQ Stock Exchange and in 2014 had an annual revenue of US$648 million (NASDAQ, 2015), also established a small private university in Adelaide.

The sector may now be said to have entered a ‘mature’ stage. As shown in Figure 3.1 above, the sector appears to have reached a plateau in the number of providers offering programs approved for the purposes of accessing FEE-HELP. As shown in Figure 3.2 above, enrolment numbers also appear to have stabilised, though they unexpectedly started to rise again in 2013. Other signs of ‘maturity’ include that it is no longer as easy for new providers to enter the industry, especially as public universities have become increasingly reluctant to enter into
PPPs with NSAIs and are moving instead to provide their own foundation programs. Whether or not the industry may have entered what Lumpkin and Dess (2001) describe as being a stage of ‘decline’ (see Figure 3.4 above), characterised by a declining appetite for the product and the exit of some providers, is not yet clear. A decline in enrolments is not impossible: events such as an unexpected decrease in international student enrolments or a widespread change in student preferences favouring study at a university rather than a private college could well send the industry into decline.

3.4 Challenges and Issues for the Sector

The sector faces a variety of challenges. The first concerns its public image. The sector consists entirely of institutions that carry the title of ‘school’, ‘college’ or ‘institute’, and not the title of ‘university’. The ‘university’ title connotes considerably more prestige and status, and so the sector does not have equivalent status to that of the university sector. Furthermore, because the sector is not publicly financed, and since nearly all NSAIs rely on profit-making to survive, the sector is often the subject of media claims associating it with ‘degree mills’ (institutions that give qualifications to as many customers as possible) and ‘visa factories’ (institutions that provide programs solely for the purposes of allowing international students to obtain employment-related visas). Both labels suggest low academic standards in the sector. These claims are, however, difficult to substantiate because concrete evidence to support them would be difficult to locate. As Marginson (2006) points out, the issue of quality is a sensitive area for all non-prestige higher education institutions, and especially if privately owned, and so NSAIs are constantly vigilant in seeking to protect their public image.

The second challenge derives from the fact that there is currently no system for independently judging or ranking NSAIs in terms of the quality of their programs as used for national and international universities. Ranking systems for universities are, according to Dill and Beerkens (2010), and Marginson (2006), based heavily on research performance, but NSAIs do not normally engage in research. Direct comparison with universities in terms of graduate satisfaction scores is not possible either, because NSAIs do not participate in the annual university experience survey administered nationally by Graduate Careers Australia. Furthermore, in contrast to AUQA’s practice of making audit reports publicly available, TEQSA’s evaluation processes for registering and accrediting NSAIs focus only on
compliance with specified standards. There is, therefore, no information provided about process-oriented incentives to improve educational standards, such as those that were previously provided by AUQA through its system of ‘commendations’, ‘affirmations’ and ‘recommendations’.

The third challenge concerns admission standards. Admission standards are often employed as an indicator of institutional quality, but, here again, comparisons between the non self-accrediting sector and the university sector are impossible. For school leavers, admission to university is determined by a student's Australian Tertiary Admissions Rank (ATAR), a ranked score of the student’s performance based upon results achieved in the final year of school. Universities implement the ATAR in order to determine a minimum entry requirement for particular award programs. University Admission Centres (UAC) are responsible for administering applications. In contrast, NSAIs undertake direct consumer marketing and they directly admit students to award programs. Minimum entry requirements for admission to their programs are rarely made public, and are often arbitrary. Furthermore, many NSAIs proactively manage enrolment processes whereby admission to an institution may be based only on an interview and a letter of recommendation (Edwards, Coates & Radloff, 2009; Shah & Sid Nair, 2013).

The fourth challenge concerns compliance costs. These costs are an ongoing source of financial pressure for the sector. Prior to TEQSA, and, as reported by Burgess and Baird (2011), and by Treloar and Baird (2011), the sector experienced a significant regulatory burden in having to comply with requirements under the Educational Services for Overseas Students (ESOS) Act 2000 to undergo AUQA audits, and to satisfy the reporting requirements of the Commonwealth Government. As Treloar and Baird (2011, p. 9) observed, many NSAIs ‘struggled with the costs of regulation and compliance’. With TEQSA as the sole regulatory authority, however, a more streamlined process for registration and accreditation was implemented. TEQSA requires, however, that the NSAI sector should perform according to a set of strict standards, including provider registration standards, provider category standards, provider course accreditation standards, and qualification information standards. Dow and Braithwaite (2013, p. 48) comment that the time, cost and effort involved in meeting TEQSA’s regulatory requirements significantly impact on the viability of many NSAIs.
Finally, there is the challenge for NSAIs to achieve a separation of powers between a corporate board of management and an academic board. While in public universities, there are well-established cultures that enable the separate functioning of a university council, a university executive and an academic board, in the non self-accrediting higher education sector the separation of powers is not nearly as well delineated, possibly because of an overriding concern about the creation of wealth and the generation of returns to shareholders (Wheelahan, Arkoudis, Moodie & Fredman, 2012). Shareholder representatives, who form a board of directors, exercise corporate governance. Academic governance, according to TEQSA (2015a), is supposed to be independently exercised by an academic board that should be concerned with ‘the integrity and quality of the core higher education activities of teaching, research and scholarship.’ Corporate board members in NSAIs are, however, often permitted to attend academic board meetings, and many do. They may also even be permitted to exercise voting rights on the academic board. As observed in various AUQA audit reports, the separation of powers between corporate boards of management and academic boards in NSAIs are often unclear, and may provide the potential for conflicts of interest. AUQA commented critically on instances where the chair of the corporate board also chaired the academic board (AUQA, 2009, p. 9), and where business objectives alone were included in the institution’s strategic plan (AUQA, 2008a). In short, the problems associated with separating corporate and academic governance responsibilities in the non self-accrediting higher education sector are challenging.

There are a number of quality-related issues that are important to the future of the non self-accrediting higher education sector. First, there is the question of the sector’s ability to continue to expand, while at the same time maintaining a reputation for quality. It has been estimated by the Group of Eight universities in Australia (Group of Eight, 2010) that there will be a need to provide an additional 220,000 higher education enrolments by 2030. Shah and Brown (2009) claim that by 2030 up to 30 percent of all higher education students will be enrolled in private higher education institutions – currently only 8 percent of all higher education enrolments in Australia are in NSAIs. Were the sector to expand dramatically up to 2030, the question of its quality would become a matter for more serious attention. Treloar and Baird (2011) have, for example, pointed to the need for assessment moderation to be improved within the sector. Shah and Sid Nair (2013, p. 824) have claimed more generally that ‘private for profit higher education shows alarming issues related to quality’. It would
appear that future growth of the sector may need to be accompanied by a strong focus on quality and academic standards, and particularly on the effective implementation of assessment moderation processes.

Second, because the non self-accrediting higher education sector is commercially driven, and because international experience indicates that commercially-driven higher education providers shows a variable commitment to quality management processes (Altbach, 2009; Levy, 2010), there is the issue of ensuring that commercial imperatives in the sector are not given priority over imperatives associated with the maintenance of academic integrity. Successive federal governments in Australia have supported the increased application of market principles to the higher education system, as indicated by, for example, the more aggressive adoption of a user-pays approach to funding, and by the removal of all restrictions on the number of undergraduates, including publicly-supported undergraduates, that higher education institutions may enrol. In this environment, NSAIs are in a position to accept as students those young people who may not have achieved admission to selective programs delivered by universities (Marginson, 2004; Shah & Sid Nair, 2010). However, these are students who are likely to need more academic support, and NSAIs driven by commercial imperatives may be prepared or well placed to afford providing proper academic support services. Concerns about this scenario are being voiced in the literature (Chaney, 2013; Wheelehan & Moodie, 2011).

Finally, quality is at risk in NSAIs because of their heavy reliance upon sessional academic staff appointments. Sessional appointments of academic staff have become an essential part of the business model of non self-accrediting higher education institutions. These types of appointments are much less costly than long-term full-time academic staff appointments, but the extent of the sector’s reliance on them presents quality-related challenges. These staff members hold casual, often part-time, positions, and are employed solely to provide teaching services, including student assessment. There is a high turnover in their employment (Colbert, Wyatt-Smith & Klenowski, 2012), and many of them may concurrently hold employment contracts at several higher education institutions. Sessional academic staff members are unlikely to be employed to engage in quality management processes, such as assessment moderation, that by their nature are time-consuming and require a sustained commitment. Alexander (2006) reports that casual academic staff members are also less likely to engage in
lengthy consultations with students, or to participate in non-essential processes or activities. In short, sessional academics are unlikely participants in the kind of long-term sustained investment of effort that Hughes (2008), and Morgan et al. (2004) have identified as being a foundation for the successful implementation of quality management processes.

3.5 Concluding Remarks

This chapter has reported on the re-emergence of a non self-accrediting institution sector in Australia and has documented its rapid expansion since 2005. The dynamics of the sector’s development during the period since 2005 have been reported, and the considerable range of challenges accompanying its current situation have been explained. It seems fair to say that the sector is at a point where its legitimacy within the higher education system is under more intense scrutiny than at any time in the past. In this regard, TEQSA, which exercises enormous authority on behalf of the Commonwealth Government, will play a critical role in shaping the sector’s future direction. On present indications, weaknesses in the academic integrity of the sector will not be tolerated. One of the areas of performance that will be tested concerns the maintenance of academic standards, and, in this context, interest in assessment moderation is likely to be important as a relevant consideration. It is therefore timely for the matter of the implementation of an assessment moderation framework to be closely examined.
Chapter 4

Methodology

This chapter reports on the methodology for the investigation. It documents the research design, the techniques of data collection, the data analysis, and the measures implemented to assure rigour. The methodology for the investigation is post-positivist in nature: it seeks to document the experiences of key participants regarding assessment moderation at selected site institutions in a state capital city. The approach is constructivist, seeking to interpret and illuminate the experiences of the participants, employing ethnographic data collection methods. The methodology of Naturalistic Inquiry (Lincoln & Guba, 1985) is used because it not only accommodates all of these elements, but it also uses well-established trustworthiness criteria to achieve credibility, dependability, confirmability and transferability of the investigation’s findings.

4.1 Research Design

Naturalistic Inquiry (Lincoln & Guba, 1985) is well suited to the investigation of complex social situations in which the meanings people attribute to a phenomenon are of primary interest. Within this paradigm, the researcher undertakes an in-depth investigation of a community, addressing its culture, its characteristic behaviours, and its systems of communications. The researcher does so by becoming immersed in the natural setting of the community that is the focus of the investigation. Naturalistic Inquiry is constructivist in its epistemology; that is, it is based on the assumption that reality, rather than being objective, is constructed and interpreted by the researcher, based on the words and behaviours of the key participants in the investigation. It is interpretive in its theoretical orientation; that is, it recognises that it is the researcher who ultimately gives meaning to the data collected, having become immersed in the meanings given to the phenomenon of interest by the participants. The researcher enters the world of these participants, seeking to understand and interpret their experiences, while at the same time recognising that ‘human knowledge claims are active constructions of meaning and, therefore, always relative to the unique interaction between the inquirer and the particular context in which the enquiry was conducted’ (May, 2002, p. 264). Naturalistic Inquiry is ethnographic in its approach to data collection and requires in-depth
interviews in order to generate ‘thick description’, as described by Patton (2002, p. 437), of the phenomenon of interest. Originating in anthropology, ethnographic approaches seek to describe and interpret cultures and behaviours (Schwandt, 2007) and are widely utilised in the study of social issues in organisational and educational settings. In the present investigation, an ethnographic approach is utilised to provide an understanding of the cultures of institutions involved in assessment moderation processes at four selected non self-accrediting higher education institutions in a state capital city.

Lincoln and Guba (1985, pp. 39-43) identified fourteen distinctive characteristics of Naturalistic Inquiry, which, taken together, make this approach to inquiry systematic. These characteristics, and some of the ways in which they were applied in the present investigation, are as follows:

- **Natural setting:** Data collection takes place in the natural setting of the phenomenon of interest. The aim is to understand human experiences in the context in which they occur. It is important to capture their authenticity. In this investigation, the natural settings were the workplaces of the participants, and each participant recognised themselves as having an identity in relation to their workplace. It was important here for the researcher to be able to collect data in a way that was least intrusive in this natural setting.

- **Human as instrument:** The researcher is the instrument for the collection and interpretation of the data. The researcher engages in the daily life and the regular conversations of participants to the greatest extent possible, seeking to understand their points of view, to record details using rich description, and to grasp the meaning of different interactions in the everyday setting. It is ultimately the researcher who gives meaning to all that is discovered. This responsibility is potentially a heavy burden for the researcher, who must strive to state clearly any personal bias. To assist in this process, Lincoln and Guba (1985, p. 40) proposed certain trustworthiness criteria to be applied to ensure rigour. Because of their importance, these criteria are addressed separately and in detail later in this chapter.

- **Utilization of tacit knowledge:** The existence of tacit knowledge held by the participants is recognised and its importance is valued. Depth and subtlety are valued because of their contribution to the richness of understanding of the culture of the participants. Broadly speaking, tacit knowledge refers to the kind of understanding
that may not be able to be articulated verbally, such as a nudge or a wink. Nevertheless, the communication of tacit knowledge forms a valuable part of the data set. In the present investigation, this information was collected mainly through observation.

- **Qualitative methods**: Qualitative methods of data collection and analysis, such as interviews, text analysis of documentation, and observation, are used because they permit the multiple realities of participants to be described. Lincoln and Guba (1985, p. 40) also note that qualitative methods reveal the nature of the transaction between the researcher and the participants, thereby further pointing to any potential researcher bias. The present investigation relied mainly on interviews, but there was also a need to review and analyse documents provided by the site institutions, and to observe the operation of various committee meetings.

- **Purposive sampling**: Purposive sampling was employed because the focus is on uncovering and describing the richness of the understandings of the phenomenon under investigation. Participants were, therefore, purposively selected for the richness of the understandings they could bring to the data set. In the present investigation, the four site institutions were purposively selected.

- **Inductive data analysis**: An inductive approach was adopted to the interpretation of the data collected. This means that insights from the data are the product of interactions between the researcher and the participants. It is on the basis of a close exploration of these interactions that themes are developed inductively from the data, using established techniques for qualitative data analysis (Creswell, 1998). The approach to the analysis of the data for the presentation investigation was inductive, involving as it did the disciplined extraction of key themes from the interview and observational material.

- **Grounded theory**: Theory, in the form of substantive themes, emerges directly from the data set. In the present investigation, substantive themes were identified, and these are documented in the findings chapters. A framework derived from these findings is proposed in the final chapter.

- **Emergent design**: The researcher cannot predict at the outset what will emerge from the data. The research design must, therefore, be flexible and open to change as new directions and new data are discovered. The researcher, in conducting the present
investigation, was open to the need to revise the research design in the event of unexpected developments, but, in fact, no change of plans was necessary.

- **Negotiated outcomes**: While the researcher is the instrument of analysis, the outcomes from the research and the meanings drawn from the data need to be negotiated with the participants. Therefore, *Naturalistic Inquiry* relies heavily upon member checking and the triangulation of data over time and across data sets, participants and methods of analysis. The purpose here is to verify and confirm any interpretations made and to ensure that the voices of the participants are reported accurately. In the present investigation, participants were given ample opportunity to check transcripts of their interviews. There was also frequent informal interaction with the participants over the extended period of data collection.

- **Case study reporting mode**: A case study reporting format, rather than a scientific or technical form of reporting, is, according to Lincoln and Guba (1985, p. 41), more applicable to describing multiple realities and to demonstrating the researcher's interaction with the site, as well as any consequential biases. The present investigation is reported in a way that reflects the reported experiences of the individuals – there is no attempt made to overlay it with a scientific or technical form of reporting.

- **Idiographic interpretation**: Data are interpreted and conclusions drawn idiographically, that is, in terms of the details of the case, rather than according to laws or pre-existing generalisations. In the present investigation, the generalisations emerge from the data, and not from a pre-existing perspective on the data.

- **Tentative application**: The researcher must be hesitant about making broad generalisations from the findings because realities are multiple and diverse. In the present investigation, it is left to the reader to identify what is transferable to other situations. No attempt is made to generalise about the whole of the non self-accrediting higher education sector.

- **Focus-determined boundaries**: The researcher usually sets boundaries to the investigation as main themes begin to emerge. While the researcher is flexible and responsive, he or she must also focus on the main themes. In the present investigation, the researcher took account of the point at which data saturation became evident, at which point further data collection was considered to be no longer necessary.
- **Special criteria for trustworthiness:** The conventional trustworthiness criteria of validity and reliability are inappropriate for use in developing grounded theory based upon multiple perspectives. Special trustworthiness criteria are instead required. As reported above, trustworthiness criteria for the investigation are reported separately later in this chapter.

In summary, *Naturalistic Inquiry* addresses the ‘world of lived reality and situation-specific meanings’ (Schwandt, 2007, p. 118). Its focus is the elucidation of an insider’s understanding of a phenomenon, and it is most often employed in research that seeks to understand a social phenomenon holistically.

### 4.2 Method of the Investigation

#### 4.2.1 Ethics Approval

Prior to commencement of the present investigation, formal consent to proceed with fieldwork was obtained from the Southern Cross University (SCU) Human Research Ethics Committee. The Committee approved the proposed investigation and research design. The approval number is ECN-12-168. The application and the note of approval are included in Appendices 1 and 2.

#### 4.2.2 Selecting Site Institutions

To obtain enough information to understand the process of assessment moderation in the non self-accrediting higher education sector, four site institutions were selected for investigation. The basis for their selection was that they were implementing assessment moderation processes in response to national quality assurance framework requirements. As explained in Chapter 3, non self-accrediting higher education institutions are a collection of large and small institutions that deliver educational content that leads to qualifications across a broad range of fields of study. Accordingly, the site institutions needed to provide maximum variation in enrolment numbers, staffing profiles and range of qualifications offered. Furthermore, an important feature was that each site needed to have completed at least one AUQA audit, to be registered with TEQSA and to have had its programs accredited by TEQSA. Accreditation by TEQSA meant also that there would be some external quality-
assessment data available against which to triangulate any quality-related claims made by the participants. In order to achieve a level of diversity in the participants it was determined that the site institutions should have at least 200 students enrolled, in order to provide the prospect of having a large and diverse academic workforce. Furthermore, it was considered important that the sites should accommodate a range of academic staff appointments, including sessional and full-time academic staff members, and that each site should be delivering a minimum of two accredited higher education qualifications. These broad criteria reflected the nature of the NSAI sector and the academic staff profile, as discussed in the Chapter 3.

According to TEQSA's register of Australian higher education providers, there were about 60 NSAIIs in Australia that met these requirements. A further consideration was the convenience to the researcher in undertaking the fieldwork. It was deemed appropriate that the site institutions should be located in a city that was accessible for the researcher. Convenience of access was important to facilitate prolonged engagement, member checking and triangulation among the participants, all of which are requirements of trustworthiness criteria.

4.2.3 Engaging the Site Institutions

Initial contact was made by telephone with senior executive members of staff at the four selected site institutions. In each case, a request to be involved was warmly received. Face-to-face meetings with the chief executive officers of the four institutions were subsequently arranged. At these meetings, the investigation was fully explained and the formalities of obtaining informed consent for site participation in the investigation were completed. The senior executives were made aware that they could withdraw from the investigation at any time and for any reason. They were all given a firm undertaking that the names of their institutions, and any information about the participants that might reveal a clue to their identity, would be kept confidential. Details of the informed consent form that needed participants' signatures to confirm that they understood the contractual requirements with the researcher are available in Appendix 3.

Each of the selected site institutions had been in operation for more than 20 years. Collectively, they offered programs across a wide range of fields of study, including hospitality, business, sociology, psychology and media, so they reflected the diversity of
programs provided across the non self-accrediting higher education sector. At the time of their establishment, each delivered certificate and diploma qualifications accredited under a vocational education and training (VET) framework, and each was registered with the relevant state department of education. Three of the four site institutions had until 2005 provided VET programs only. One had been offering degree programs since the mid-1990s. Between 2007 and 2010, three of the institutions had been taken over by national or international education corporations to become part of a portfolio or institutions within a large parent company.

The four institutions in the sample operated as discrete entities and separate business units. The first institution was privately owned and had no established association with any of the other institutions. The second institution was owned by a parent corporation that had one other higher education institution in Australia and numerous others internationally. The third and fourth institutions were owned by the same parent corporation, however each delivered unrelated qualifications, had separate campuses, and operated as discrete institutions and business units – they were integrated only with respect to the sharing of corporate services, including finance, marketing and information technology.

Registration and accreditation with TEQSA was managed differently across the four site institutions. For two institutions, the process had been managed by a parent company that had submitted a consolidated application for a portfolio of institutions and qualifications. In these cases, there was one registration for the corporation and numerous accreditations for the range of qualifications delivered by the numerous institutions within the portfolio. For the other two institutions, one privately owned by an individual, and one privately owned by a consortium, the academic and administrative staff members at the institutions concerned had managed the TEQSA registration and accreditation processes. Across all four of the institutions, it was necessary for the senior academic managers to provide and report information to TEQSA that formed the basis of the applications for registration and accreditation. All four of the site institutions had participated in at least one AUQA audit, and so each was experienced in the preparation of quality assurance portfolios.

The main awards offered at the site institutions focused on the areas of marketing, public relations and advertising, media, hospitality and the social sciences. The qualifications
accredited and delivered by them included diploma, bachelor’s, graduate certificate and master’s qualifications. Student enrolment numbers at the four site institutions varied from 220 students to over 1,000. At three of the institutions, more than 90 percent of all enrolments were domestic students, enrolled full-time or part-time. At the fourth institution, 95 percent of all enrolments were full-time international students.

The four institutions shared similar governance and management structures. Governance was corporate, exercised by a board of directors appointed by the owners. Each institution had an executive officer, referred to as the director or the dean, who was supported by a management group responsible for specific programs or having specific academic responsibilities. Most academic staff members were employed on a sessional basis, and so had limited security of tenure. The principal academic committee at each institution was its academic board. Each institution also appointed a teaching and learning committee to advise the academic board, though at three site institutions there was a high level of overlap between membership of the academic board and the teaching and learning committee.

At the four site institutions, managers were responsible for the development of award programs, for the quality of their delivery, for processes associated with quality assurance, and for staff training and supervision. At two of the site institutions, senior managers were responsible for submitting the final grades for a study period to the teaching and learning committee prior to the grades being submitted for approval by the academic board. At a third institution, the final grades were presented to an examination committee before being submitted for approval by the academic board. At the fourth institution, the final grades were submitted directly to the academic board for approval.

Across all four institutions, various modes of program delivery were employed, including face-to-face delivery, blended learning (face-to-face and online), and fully online, utilising internet-based technology. The dominant enrolment type was full-time, with face-to-face delivery. To deliver these programs, each of the four site institutions relied heavily on sessional academic staff. At two of the institutions, there were more than 20 sessional academic staff members employed, while in the remaining two institutions there were more than 40 sessional academic staff members employed. At one institution, sessional staff represented over 80 percent of all academic staff members delivering programs. Three of the
site institutions maintained satellite campuses, accounting for up to one-quarter of their enrolments. At the three institutions with satellite campuses, senior executive and management academic staff, as part of their quality assurance responsibilities, periodically visited satellite campuses to review their operational and reporting activities. Assessment grades from satellite campuses were in all cases processed through teaching and learning committees at the main campus.

4.2.4 Selecting Interviewees

Each of the four participating institutions provided a list of a broad range of potential interviewees with experience in assessment moderation processes at their institution. It was determined that each of the interviewees should have a minimum of three years of employment experience in the delivery of a higher education program in order to obtain rich descriptive data. An additional selection criterion was that each needed to be willing to provide a detailed account of their experiences with assessment moderation. It was not possible to determine whether potential participants fulfilled this criterion until they were approached in person.

In order to gather thick, rich description from participants about their experiences of institutional assessment moderation requirements, and of the implementation of assessment moderation processes, a selection of experienced academic staff members was made. Within each institution, an executive member of staff was included in the sample, together with a cross-section of managers. To supplement this selection, a cross-section of full-time and sessional academic staff members was included in the pool of participants from each site. In total, 21 potential interviewees were identified. Each participant was provided with details of the research and was asked to complete a form indicating their agreement to participate in the research as detailed in Appendix 4 and 5. They represented a range of levels of appointment across the four site institutions. Together with four executive members of academic staff, there were six academic members with management responsibilities (mainly heads of department), three full-time academic staff members and eight sessional academic staff members. From three of the institutions, there were five participants and from the fourth institution there were six participants.
4.3 Data collection

4.3.1 Interviews

Interviews were arranged by telephoning or sending an email to all those identified as prospective interviewees. All 21 persons approached in this way willingly agreed to participate. Many expressed a great deal of interest in the topic. They completed a statement of informed consent, indicating that they clearly understood the aim and nature of the investigation and their role in it. In nearly all cases, the interviewees indicated a preference for the interview to take place at their workplace. In only two cases, the interviews took place away from the workplace, simply for the convenience of those participants. Every interview was held in an office or similar space where privacy could be assured.

4.3.2 The interview schedule

The interviews were intended to achieve what Patton (2002, p. 437) describes as ‘thick, rich description’, that is, an account of their experiences of assessment moderation that was detailed, personal and reflective. To elicit this outcome, and to guide the conversation, an interview schedule was developed in advance and shared with each interviewee. One interview schedule was used for all the interviews. A copy of the interview schedule is presented in Appendix 6. Here Table 4.1 sets out the questions asked to all participants, together with details of the intended purpose of each question.

<table>
<thead>
<tr>
<th>Question</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To start, please tell me about the nature of your role and responsibilities at this institution. What responsibilities do you have regarding the delivery of an academic program or units/subject of study?</td>
<td>These questions provided a basis for understanding each participant’s role and responsibilities. As general scoping questions, these provided a means of gauging the participant’s involvement in the academic program, the process of assessment moderation and quality management activities generally.</td>
</tr>
</tbody>
</table>
2. TEQSA is the new accrediting body for the Australian HE sector. Within their registration system, institutions will be assessed on five categories:

- **a. Provider Standards (consisting of the Provider Registration Standards, Provider Category Standards and Provider Course Accreditation Standards);**
- **b. Qualification Standards;**
- **c. Teaching and Learning Standards;**
- **d. Research Standards and**
- **e. Information Standards**

Question 2 continued:

Referring specifically to teaching and learning standards what do you think are the components of quality teaching and learning?

(If the respondent names more than five, she/he was then asked: **What would you name as being the top five components in order of priority?)**

3. What role and responsibilities does your position have for student assessments (development, evaluation, review)? Do any of these involve the need to moderate student assessment practices and outcomes?

The interview questions then proceeded to the ‘mini tour’ questions which provided more detailed responses including rich and informative data (Spradley, 2003, p. 49).

These questions addressed specifically the extent of the responsibilities carried by the participant for the design, implementation and management of assessment tasks.

4. For your position could you explain in detail, the assessment moderation practices you engage in directly?

With the participant’s role and responsibilities having been established, it was proposed then to find out what specific practices the participant undertook as part
(And if the participant was a manager or executive: What assessment moderation practices do you require any of your members of staff to engage in directly?)

| 5. What are the assessment moderation processes that your institution practises on an ongoing basis? |
|---|---|
| This question explored the processes and activities of the institution in the implementation of assessment moderation. Questions, three, four and five provided the opportunity to correlate the relationship between management, academic staff and the institution’s activities. |

| 6. If you were to explain to a friend, what is your understanding of ‘assessment moderation’? (with supporting questions where the participant provided a limited response) |
|---|---|
| a. What do you think assessment moderation should involve? b. Is assessment moderation important to do? If so, why? |
| At this stage, participants were expected to have fully engaged in the interview process, established rapport with the interviewer and confidence about their knowledge of assessment moderation. This question allowed the participant to demonstrate their understanding and expertise in explaining assessment moderation to an independent person. |

<p>| 7. What role and responsibilities do individual lecturers in your institution have for the implementation of assessment moderation? |
|---|---|
| a. How is any accountability in this regard communicated to them? |
| This question sought to establish whether their institution had an established process for the delegation of responsibility for assessment moderation. The supporting questions provided insights into the functions and actions of management in the implementation and evaluation of assessment moderation. |</p>
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>b. Is there ever any check on their performance of these responsibilities? If so, how does this happen?</td>
<td>These questions were intended to elicit details about the extent to which there was a coordinated and inclusive institutional process for the implementation of assessment moderation at the site institution where the participants were employed.</td>
</tr>
<tr>
<td>8. The delivery of an academic program is an integrative process – i.e. staff, units of learning, lecturers, accreditation assessments etc.</td>
<td></td>
</tr>
</tbody>
</table>
9. **Does your institution have a formal policy and procedure for assessment moderation? If ‘yes’, why, and if ‘no’, why not?**

*Has your institution ever delivered training and development on assessment moderation?*

At this stage, the interview questions involved the use of ‘example and experience’ questions that provided the richest and most detailed data (Spradley, 2003, p. 49).

This question assisted in identifying if there were formal processes for assessment moderation for academic staff to adopt and implement. The question further triangulated data collected in questions four, five and seven.

Furthermore, it provides insights into the training programs of the institution associated with assessment moderation.

10. **Have you ever been made accountable within your institution for the implementation of assessment moderation, and, if so, how has this accountability been communicated to you?**

Triangulating with questions three and seven, this question explores the nature of position responsibilities, delegation and staff coordination.

11. **Do you have any experience of assessment moderation practices at other higher education institutions? If so, what has been your experience?**

The participants, especially sessional academics, tend to be employed at numerous private and public institutions. This question sought to establish if the participants had participated in assessment moderation at other institutions.

12. **Have you read much about assessment moderation in higher education, or have you come across any interesting documents, including policies and procedures, about the topic?**

This question sought to establish the extent of exposure of the participant to internally and externally published literature and resources on assessment moderation.
13. Regarding my investigation of assessment moderation in non-self-accrediting higher education institutions in Australia, do you have any additional advice or concerns to share with me?

And:

14. Is there anything I have not covered in this interview that you think should be addressed because of its relevance?

The two closing questions, 13 and 14, sought to permit the participant to express any additional comments or issues which were not addressed in the interview schedule. Mostly importantly, these questions provided the opportunity for the participant to close the interview with their final thoughts and comments.

4.3.3 The interviews

The interviews were scheduled for one hour each, but in many cases the amount of time spent in discussion extended well beyond one hour. The longest interview was for two hours. Rapport was quickly established by means of general chatting about topics of mutual interest to the researcher and the interviewee (Patton, 2002, p. 53). Having been assured about confidentiality and anonymity, none of the interviewees gave any indication of caution or concern. Care was taken at the start of each interview to explain clearly what the investigation was seeking to achieve and how it was being implemented. Participants were also reassured that they could stop the interview, and their participation in the investigation, at any time and for any reason.

The interview schedule (Spradley, 2003, p. 49) provided a valuable point of reference for the interviews, but was not rigidly followed. Participants were asked whether they were happy for a digital recording device to be used. All of them agreed. The researcher reminded them that the recording device could be turned off at any point in the conversation if sensitive matters were being discussed. No interviewees asked for the recording to be paused or stopped.

The recordings, together with notes taken during the interviews and documents provided to the researcher by the interviewees, provided the basis for a comprehensive summary to be made of each interview. In almost every case, the interviewees invited the researcher to tour
their institution and to mix socially and informally with academic colleagues in order to become more familiar with the natural setting.

4.3.4 Other Data Sources

The researcher was provided with a great deal of documentation for each of the site institutions. The documents included statements of policies and procedures, quality assurance protocols, student handbooks and corporate prospectuses. At two of the site institutions, the researcher was invited to observe meetings of the committee responsible for the management of examinations and the final determination of grades for the students. Attendance at such meetings provided an important opportunity for observing the culture of the institutions with respect to student assessment generally.

4.4 Data Coding and Analysis

4.4.1 Data Coding

Each of the 21 interviewees was allocated an identification code according to four descriptors: their position or responsibilities, their employment type, their area of academic expertise, and the sequence number of the interview. The first descriptor concerned the interviewee’s position as an executive member (E), manager (M) or lecturer (L). Executives (E) were the most senior members of staff at the site institutions. They exercised ultimate responsibility for the implementation of a quality management framework and for maintaining registration and accreditation of the institution with TEQSA. Managers (M) were the staff members responsible for the implementation of academic programs, quality management processes and the supervision of academic staff. Managers reported directly to the executives. Lecturers (L) were those staff members whose primary responsibility was the delivery of subjects to students. The second descriptor concerned the interviewee’s employment status as full-time (F) or sessional (S). Full-time staff members (F) were employed on a year-round basis, whereas sessional staff members (S) were employed on fixed-term contracts for specified teaching periods. The third descriptor concerned the interviewee’s primary field of scholarly affiliation, that is, whether they taught in business (B), media (M), hospitality (H) or Sociology/Psychology (S). The final descriptor concerned the sequence of the interview when there were several participants with the same code. The code LSB4, for example, was a
lecturer, employed on a sessional basis, teaching in a business area, and who was the fourth interviewee with these characteristics. An institution-based code was not applied, however each participant was associated with the institution by the scholarly affiliation. In the reporting of the findings, however, reference is made to differences in responses depending upon the site institutions concerned.

Table 4.2 below presents an overview of characteristics of each of the interviewees. As well as recording identification codes based on position, employment type, area of expertise and interview sequence, it shows their educational attainment and experience with the university sector. An important feature of the sample is that 14 of the 21 interviewees had been, or were currently, also members of academic staff at a university. This pattern is not unusual across the non self-accrediting higher education sector. As reported in later chapters, this broader level of experience of a majority of the participants provided a basis for them to compare practices across the university and NSAI sectors. Similarly, most of the interviewees had extensive experience as employees in the non self-accrediting higher education sector. In selecting interviewees, an attempt had been made to include as many experienced members of academic staff as possible in the expectation that they would have the most developed appreciation of the nature of assessment moderation.
Table 4.2 Interviewee Profile and Identification Code

<table>
<thead>
<tr>
<th>Interview number</th>
<th>Position</th>
<th>Employment type</th>
<th>Discipline</th>
<th>Identification code</th>
<th>Education</th>
<th>University experience</th>
<th>Gender</th>
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</thead>
<tbody>
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<tr>
<td>21</td>
<td>L</td>
<td>S</td>
<td>Hospitality</td>
<td>LSH1</td>
<td>Masters</td>
<td>Yes</td>
<td>F</td>
</tr>
</tbody>
</table>

Coding keys:
Position: Executive (E), Manager (M), Lecturer (L)
Employment: Full-time (F), Sessional/casual (S)
Discipline: Business (B), Hospitality (H), Media (M), Sociology and psychology (S),
Education: Highest level of education
University experience: Interviewee has delivered subjects at university
Gender: Female (F), Male (M)

4.4.2 Data Analysis

The three main sources of data were interview transcripts, observations made by the researcher, and documentary materials, with interview transcripts being the primary source of data for the investigation. An inductive approach was adopted for the analysis of the data. As Patton (2002, p. 56) describes, inductive analysis begins with making specific observations about items of data and then builds toward identifying interesting patterns in textual data.
Transcripts of the interviews, together with notes and memos, provided a huge volume of data (over 110,000 words). The researcher transcribed each interview into a Microsoft Word document. The transcripts were then listened to several times and re-read many times to generate observational notes and memos for follow-up with participants. These notes and memos formed a valuable addition to the interview data set. Notes and memos were also made on all documents analysed, and data generated by triangulation across data sources, across sites and across employment level also formed part of the data set. Eventually, a large consolidated textual data set was generated. The data set of 21 interviews (110,000 words), was then loaded into NVivo*10 (QSR, 2014), a software package that facilitates the classification of text into multiple categories according to themes (open coding). NVivo*10 also facilitated the retrieval of textual data under categories or themes. The data collected from secondary sources, policies procedures and notes collected meetings, were not loaded to NVivo*10 to ensure there was no contamination of the primary data. In accord with the constant comparative approach described by Glaser and Strauss, (1967, p. 105), all of the textual data was then analysed for emergent themes, first using open coding and later using axial coding. As terms and themes such as ‘bell curve’, ‘standards’, ‘consistency’, ‘equity’, ‘culture’, ‘leadership’ and ‘cost’ were identified across the data set, they became signposts to significant categories of information and a basis for further analysis of the data. As the analysis of the data set continued, emerging themes became clearer and these informed the continuous refinement of the analysis. Finally, selective coding aided in the consolidation of key themes and provided a basis for determining linkages and relationships between them. When it became apparent that no new themes were emerging, that is, when the point of data saturation had been reached, the researcher wound down the analysis of the data. Throughout the analytic process, the researcher sought to refine an understanding of the data by developing diagrams and other graphical representations of the terminology and the relationships.

In the analysis of the data each interview was regarded as unique, but each interview also belonged to a subset of the data relating to the unique circumstances of each of the four institutional settings. Accordingly, an important element in the data analysis involved the search for any specific themes associated with the interviewee’s position, employment type and responsibilities. The analysis of the consolidated data and emerging themes also
considered individual scholarly affiliations and any consistent references to the non self-accrediting and university sectors.

The complementary documentary materials, including AUQA and TEQSA audit reports, contributed significantly to the development of an understanding of the individual cultural characteristics of each of the four site institutions. They also provided a wealth of material that allowed for a triangulation of the data provided by individual interviewees. Other documents were also analysed, particularly AUQA audit reports for each of the four institutions. These reports were regarded as especially important because they made reference to the assessment moderation processes observed at each of the four site institutions. Upon completion of the analysis, there was a consolidation of key themes from the data. These themes provide the basis for the reports in Chapters 5 and 6 on the findings from the investigation.

4.5 Trustworthiness and Reliability

Rigour is critical in ensuring the integrity and quality of ethnographic research. Lincoln and Guba (1985), and Patton (2002), provide details of a range of techniques that may be employed to enhance the ‘truth value’, applicability, consistency and neutrality of the findings obtained from ethnographic investigations (Lincoln & Guba, 1985, p. 290). The ways in which many of these techniques were applied in the present investigation are now documented.

Prolonged engagement, which contributes to the credibility of the findings, refers to the extent to which the researcher keeps going back to the participants and any other sources of data, in this case documentary evidence and observational notes and memos, in order to negotiate and confirm with participants any emerging themes. Informal contact was maintained with the interviewees over the 18-month period of data collection and analysis. The researcher visited each of the site institutions and conversed with the participants on a regular basis, thereby contributing to clarification of emerging themes and a process of negotiation of the interpretive outcomes. With each of the participants, a trusting rapport was developed which facilitated the checking of details. Along with the invitations to attend several meetings of the committee responsible for submitting final grades to the academic
board for approval, the researcher was also welcomed at various staff meetings over a period of time. At one institution, the researcher was invited to become a member of both the teaching and learning committee and the academic board, which provides strong affirmation of the extent of trust accorded to the researcher.

**Member checking** also contributes to the credibility of the findings. This practice generally requires participants to be provided with an opportunity to confirm or revise any interpretations or conclusions being made by the researcher. Member checking gives rise to the negotiated outcomes from the investigation explained earlier in this chapter. In the present investigation, the researcher provided each participant with an initial summary of the main points emerging from their interview. Participants were asked to review the summaries and to clarify, change or confirm any tentative observations by the researcher. They were also asked to add any additional information, as they saw fit. Each participant received a copy of their transcript of interview, but only six participants made any amendments. In addition, an end-of-project summary of the main themes to emerge from the investigation was provided to the participants, who were encouraged to provide their comments and appraisal. From the 21 participants, five provided feedback on the findings and expressed interest in follow-up discussions.

**Peer debriefing** also contributes to credibility. It involves a process of explaining aspects of the investigation to professional peers with the knowledge and skills to be able to ask searching questions and to comment on matters of rigour in the conduct of an investigation. For this investigation, the researcher had two exceptionally experienced researchers as supervisors who regularly and routinely contributed to discussions about the meaning being made by the researcher of the evidence provided in the data. In addition, informal peer debriefing occurred through discussion with four other highly qualified colleagues.

**Triangulation** involves the verification of the findings from an investigation by checking the extent to which they are consistent with data obtained from other participants, other data types and sources, and over time from the same and from different participants. In the present investigation, the researcher undertook triangulation of the data throughout the investigation. Initially, data collected during interviews were analysed and cross-referenced with the published documents of the institution, including policy documents, websites and AUQA.
audit reports. Collectively, all the institution’s participant interviews and associated published documents were consolidated and cross-referenced to provide insights into data congruence and divergence. Triangulation was also achieved through the observations and notations made during attendance at examination committee meetings, staff meetings and management briefing meetings. Triangulation further considered the relationship of data collected from the grouping of executives, managers, and full-time and sessional academics.

**Thick, rich description** contributes to the potential for an investigation to yield insights that are transferable to similar settings. It refers to the provision of detailed (or ‘thick’) description of the phenomenon of interest to the investigation, from which others may be able to transfer aspects to their own particular settings. In the present investigation, it was important to give voice to the participants. The matter of assessment moderation in NSAIs has received very little attention in the literature. The participants had many issues, claims and concerns to share, and they deserved to be heard. Their views are documented in full in the following two chapters.

In order for an investigation to be confirmable, it needs to be checked for accuracy and representativeness. In the present investigation, the researcher periodically consulted with two independent scholars with no prior knowledge of the investigation. The first was a Professor from an Australian university who was a member of the institution’s teaching and learning committee, and the second was Associate Dean, with a doctoral qualification, at an independent NSAI. These independent scholars assessed the veracity and appropriateness of the findings by reviewing the interview transcripts, observations, and notes and memos made by the researcher over the course of the investigation, and by discussing the appropriateness of the researcher’s interpretations with him.

**4.6 Methodological and Ethical Considerations**

In all research there are potential methodological and ethical, as well as practical, issues that must be addressed. In this investigation, the main issue was the risk of the researcher divulging information obtained from one site, or from one individual, to other participants who could identify the source of the information. A second issue was that, consistent with the methodology of *Naturalistic Inquiry*, the researcher needed to refrain from offering any
personal opinions concerning information obtained from the participants. To ensure the emancipatory nature of the research, it was important to share emergent findings with participants. However, particular care was taken by the researcher to avoid revealing any identifying details or making any personal judgments about data or findings. In all instances, participant interviews were independently scheduled at times convenient for the participant and at locations that provided anonymity. An important methodological consideration concerns the sensitivity of participants reporting about a particular social, therefore cultural, context in which they play a role. No identifying information about any of the participants was provided in the implementation or reporting of this investigation. The consequence is that the report of this investigation may at times not indicate the coded institution where a participant was employed, which might be confusing. Finally, the sensitivity of the data potentially compromises the four participating institutions that contributed to the investigation. Issues claims and concerns reported by participants may reflect negatively upon institutional reputations. Therefore, the identity of these institutions is wholly protected, which may also introduce some minor obscurity when the findings are considered.

4.7 Concluding Remarks

This chapter has provided an account of the research design and methods adopted for the investigation. The chapter has paid particular attention to the techniques employed to ensure the trustworthiness of the data, and to the need for confidentiality and anonymity with respect both to the interviewees and the site institutions. In the two chapters that follow, the data collected and analysed were reported with reference to the research questions for the investigation that were expressed in Chapter 1.
CHAPTER 5

Conceptions of Assessment Moderation and Methods of Implementation

This chapter addresses two of the four research questions identified in Chapter 1: how did participants in the investigation understand assessment moderation?, and what are the assessment moderation processes being employed at each of the site institutions? The aim of the chapter is to shed light on the nature of assessment moderation across the four sites for the investigation. To achieve this aim, the chapter documents first-hand accounts of the ways in which assessment moderation was viewed and implemented by members of academic staff at the four institutions.

5.1 Perspectives on Assessment Moderation

In this investigation, all of the participants demonstrated considerable self-assurance in expressing their understanding of what assessment moderation implied. An initial interview question was: ‘If you were to explain to a friend, how would you describe your understanding of assessment moderation?’ The question elicited a wide variety of responses, indicating that, in fact, there was no widely shared understanding of the concept. An experienced senior manager stated as much when he commented: Well the first thing to say is that I do not believe it is a very well understood concept. And during all my years in my previous job [head of school at a university] we did it. I do not think it is a well-understood concept by the tutors and the students (MFM1). Another executive participant, with extensive university and non-self-accrediting institution experience, went further, claiming that assessment moderation was, indeed, a really important topic ...[but] it is badly understood (EFM1), with reference, in particular, to the executive’s own institution. At the same time, all participants claimed that quality management processes in teaching and learning, including assessment moderation, were highly important. In short, assessment moderation was widely regarded in a positive light, but understandings of what exactly it involved were extremely varied.

As the interviews progressed, four broad interpretations of what assessment moderation constitutes began to take form. Broadly described, these were as follows: a process for achieving a normalised set of final grades; a process for achieving a peer-reviewed set of final
grades; a process for meeting benchmarks, particularly external benchmarks, in the way that final grades were determined; and a process for achieving consistency between markers in the determination of final grades. The most widely shared of these interpretations concerned assessment moderation as a process for achieving a normalised set of final grades, but the frequency with which this interpretation was given may have been unduly influenced by the fact that, at one of the site institutions, there was a strict insistence upon final grades being normalised.

5.1.1 Normalising Grades

The normalisation of grades, as detailed in Chapter 3, is a process whereby grades are adjusted for the purposes of achieving a predetermined grade distribution for a cohort of students. One of the more widely shared understandings of assessment moderation was that its purpose was to achieve a normalised set of final grades. For more than one-half of all participants, there was a view that the distribution of assessment grades awarded should naturally be a bell curve (EFB2). Participants explained, for example, that I am someone who does have a bell curve in mind (LFH1); and you will fail a few and you will have a few on the other side [high distinctions], so there is something that should look like a bell curve with a skew, so I would simply say to you remember to really use the whole bandwidth [distribution of grades between fail and high distinction], and look at them and make tentative notes do not put them into concrete because they will probably change when you have the total picture (MFS1); and moderation is to look at the numerical results that your marking achieves (LSB1), thereby implying that marks needed to be adjusted in order to comply with a predetermined grade distribution. Clearly, then, assessment moderation was understood as being a process for ensuring that the final grade distribution fitted a predetermined distribution of grades, a process that was often frequently referred to as fitting the results to a bell curve (meaning a normal Gaussian distribution).

This interpretation of assessment moderation was reinforced at two of the site institutions where student assessment procedures were required to take account of the need to rank student performance in accordance with a predetermined distribution of grades. At one of these sites, institutional adherence to the normalisation of final grades was rigidly enforced. Participants at this institution referred to guidelines for the preparation and submission of
final results for each study period that required there to be *more Ps than Cs and more Cs than Ds* (MFH1). No written guidelines to this effect could be found, but it was evident that the institution did subscribe to a policy of normalisation. An executive member of staff explained that *Lecturers are to ensure that overall unit marks resemble a ‘bell curve’ [meaning 5%-10% F; 40% P; 40% C; 5%-10% D or HD] and exercise their professional judgment to limit fence sitters (e.g. 64%, 74%, 84%)* (EFB1). At the institution in question, a belief in the necessity of fitting final grades to a bell curve was entrenched. Lecturers stated that this requirement was explained clearly to them during their orientation to the institution, and that the importance of ‘the bell curve’ was constantly reinforced in staff meetings. In the event that an initial grade distribution did not comply with the required distribution of final grades, teaching staff members were required to adjust the distribution before submitting the grades to the examination committee. A manager from this institution explained, for example, that *I adjust them a few marks and I review everybody, then it all falls into place* (MFS1); and a lecturer reported how *we basically fit them into a curve as typical standards require, and [so] you cannot say any particular cohort is better than another* (LFH2).

At this institution, an examination committee had oversight of the institution’s student assessment processes. It recommended all final grades for approval by the institution’s academic board. Members of the examination committee played a critical role in enforcing a requirement for all final grades to be normalised. One member of the committee explained that *we use a grade system so you need to know what the cut off scores are for those particular grades. You need to understand there is a marginal F, P, C, D and HD. We work to a bell curve at the school* (LFH1). Another member of the Committee stated that *when we complete our grades we look to have a curve in the ranking process, because obviously if we had 70 students you do not want 50 of them to receive HD’s* (LFH2). Members of teaching staff at this institution reported that they were required to use a software program known as Paradigm, which functioned both as a system for keeping attendance records and as a way of recording grade distributions when determining interim and final grades. An advantage of this software program was that it allowed comparisons of grade distributions to be made over time. One staff member described and illustrated using cases, for example, that the Paradigm software could be used to *produce reports that will give you your bell curves for previous cohorts* (LFH1).
At a second site institution, participants also reported the existence of expectations that final grade distributions should be fitted to an expected grade distribution. At this institution, members of teaching staff were required to calculate standard deviations for the distribution of final marks given to students in units of study, and to compare their mark distributions with those obtained in previous years for the units in question. It was also conveyed that there was a monitoring process to prevent grade inflation, referred to as ‘grade creep’. A manager at this institution reported that we look at standard deviations as an indicator. We look at them over the period of a year or two to see if there is any grade inflation or creep, as it is called, to see if the distribution of grades are changing up and in some instances down (MFB2). This participant went on to explain the need to prevent different units of study from having different pass rates, reporting that we looked at the distribution of the grades, so not only is that part of distribution, [but also] it is in case you [might] have a pass rate of 60% in one subject and in another you might have a pass rate of 80% or 90%. So you might ask some questions around why (MFB2). At this institution, it was evident from participating in several meetings of the examination committee that directives were being given to academic staff members about how to achieve pass rates that were consistent between different units of study. These directives were represented as being consistent with the requirements of assessment moderation. At this institution, however, the policy on grade normalisation was not as rigidly enforced as at the institution reported upon earlier.

At the other two site institutions, views on normalisation were much more varied. At one, an executive member of staff expressed the view that normalisation was inappropriate and stated that [I have] always steered clear of doing norm-referenced marking, so I have not put a bell curve on anything (EFS1). Others also expressed opposition to normalisation. One lecturer commented that personally I do not agree that we need to look at the results and make sure that it falls into a bell curve. I think that does not say anything about what they have actually learned ... It is a matter of culture and it depends upon the size of the institution (LSS2). Another commented that I mark towards the assessment task [standards]. I do not try to normalise it or bell curve it, or anything like [that]. So if I get five people getting HDs then I am not going to mark someone down, because I believe that they have done the work and we should not have to normalise the grades. I think that is what some of the universities do, but I do not do it (LSS1). An executive member of staff argued forcefully that sliding bell curves
and sliding grades to meet bell curves, and things like that, is reactive to a problem in the system (EFB2).

5.1.2 Achieving Peer-reviewed Standards

A second understanding of assessment moderation was that it was a process whereby academic colleagues actively engage in peer-review processes to ensure that there is a high level of consistency in their approaches to student assessment, and in their allocation of final grades. The focus here appeared to be on checking the integrity of the assessment instruments, seeking to ensure consistency in the application of grading standards, and implementing a collaborative approach in deciding on particular cases.

About six participants referred explicitly to the use of a peer review process for checking on the integrity of the assessment instruments. They expressed a preference for having all assessment instruments, whether tests, quizzes, essays, presentation topics, debate topics or reporting tasks, submitted in advance for review and development by colleagues, especially more senior colleagues. A typical explanation here was that we swap [assessment instruments] between the lecturers [to check on their integrity] (MFB1). A manager at one of the site institutions also reported that as an example, the examination (at the end of term), each individual lecturer will create their final exam. Other individual lecturers will be part of the process of vetting and reviewing the questions (MFH1). In some cases, the reviewing process involved the submission of assessment instruments in advance to a supervisor so that we have this moderation process, before the term starts, where we speak with all the senior academics (LFH2). In these cases, management was seen as having the responsibility of reviewing these assessments [instruments] to make sure they are addressed or pitched at the correct level (LFB1). The preliminary review of the quality and integrity of assessment tasks, where it was undertaken, occurred in each study period. It was evident that these processes were being adopted voluntarily, and were not being imposed as a consequence of any institutional policies. The participants implementing peer-review processes felt good about their professional commitment. One stated proudly, for example, that today I sat down with my colleague ... and we worked out changes to the assessment [instrument] (LSB4). The degree to which the processes were effective could not, however, be established objectively.
There was only a strong sense conveyed that the processes were valuable for the staff members who practised them.

Participants also reported using peer review processes in the determination of grading standards – seven of the participants reported adopting the practice of checking with their peers when determining grades for assessment tasks completed by students. A common form of peer review in this regard was blind marking, where a second staff member would give a grade to a student submission without knowing what grade the unit assessor was proposing to give. The process was most commonly applied where there was a small group of teaching staff members engaged in the delivery of the same unit. Thus, at one site institution, there was a report of sharing and getting a couple of people in [the] room and sharing and discussing I think this is a credit and this is why I marked it like this (MFB1). The process was also described as: it is informing us that we are measuring our quality correctly, especially when we are comparing our best, our middles and our worst. (LFH2); and as: we compare HD with HD, D with D, C with C, P with P, and F with F (EFB2). Blind marking appeared always to depend for its effectiveness upon teaching staff members being able to discuss with one another the standards they applied in grading student assessment tasks. Participants reported, for example, that we have a faculty meeting and we bring our people in and program manager [person named] gives us an assessment and we mark it and then we look at the differences. We blind mark it and then we discuss how come you have given them a fail and someone else has given them a credit (MFS1). It was, however, evident from comments made that blind marking processes were being applied only to the formative assessment of student submissions. When it came to determining final grades, individual academic staff members were expected to take responsibility for declaring a result.

Whether it was utilised to check the integrity of assessment instruments, or as a process for determining grading standards, peer review processes required meetings, and these were more likely to occur and be successful when they were convened by a member of staff with management responsibilities. Various managers reported positively on activities conducted in these meetings. One stated, for example, that the meetings were a collective process where we discussed and debated and moderated the marks for the groups (MFM1); and another reflected favourably on the meetings as a means of providing an opportunity for testing each other’s practices and standards to make sure we are delivering the best outcomes ... as they
[the students] have certain criteria to fill and we collectively discuss those (MFM1). Yet the discussion in the meetings was not always regarded positively. One participant described with a hint of cynicism, for example, that *I go to academic staff meetings and we all talk about moderation; we all talk about assessment; but in terms of actively reviewing and discussing what we are producing in terms of students, no. It all seems to be on retention and nothing else* (LSB2). Another referred to the limited value of such activities, and that attendance was a significant problem because *meetings [are] held at which 50 were invited and [only] six would turn up* (LSB3).

### 5.1.3 Meeting Benchmarks

A third understanding of assessment moderation was that it was a process directed at meeting quality-related benchmarks. Seven participants referred explicitly to assessment moderation in these terms, asking, for example: *what are the hotel standards and what are their benchmarks, what do our students need to learn to be the best or the preferred employees?* (LSH1); and asserting that we *may decide that we want to ... benchmark with [named institution]* (MFB2); and *we have standards that are industry-based, depending upon the program, e.g. body of knowledge for business including accounting, economics, management etc. Then there should be a minimum standard [a benchmark] that one is expected to deliver as [a] learning outcome for the students in that area. So if you get a degree in that particular area, it does not matter whether it is from University 1, University 2 or a PHE [private higher education provider]* (MFB3). Assessment moderation in these contexts was seen as a way of affording reassurance that assessment instruments and processes complied with certain identifiable quality benchmarks. As one participant with extensive university experience stated: *The moderation process is incredibly important ... doing an internal benchmark process every term throughout the year and across not only our own subjects and our own staff, but other subjects, and if we can externally benchmark even better ... But if you can have proper arrangements with other institutions ... then of course we can tap into this. We know that we are not only benchmarking internally but we are benchmarking externally to best practice* (LFH2).

Two forms of benchmarking were mentioned, one internal and the other external in focus. An internal focus was evident in comments about the need to comply with an institution’s own
benchmarks of performance. At two of the site institutions, for example, members of teaching staff felt as if they were obliged to compare their grade distributions with those of past student cohorts. These participants reported that [we] look at the internal benchmarking that we have done over the terms ... compare with what we have benchmarked [as the standard] in the past (LFH2); and [I look at] the papers [student assessment submissions] they produce, and looking at what they are doing [in comparison with submissions in previous teaching periods] (LSB1). Another form of internal benchmarking was evident where members of staff were required to evaluate their students’ achievements against a standard that had been very clearly articulated by their employing institution. A manager explained this process as looking at the minimum acceptable level of knowledge that the student will come out with as a learning outcome (MFB3). An interesting, though unique, instance of internal benchmarking involved four sessional teaching staff members who confidently recounted that, on their own initiative, they routinely compared past assessment tasks and student submissions with current assessment tasks and student submissions. They reported that this process informed how they awarded grades across a cohort.

An external focus, which was more frequently reported, involved the evaluation of student performance against a set of performance standards that had been established outside the institution. Industry requirements were one reference point referred to, as in comments like [you] need to check that your perception is correct and the collaboration of working with [industry] colleagues and benchmarking against what industry is doing. Also looking at what other institutions are doing and how they assess. Or certainly what industry needs, what the graduates have, in terms of graduates skills and knowledge, that they are coming out with. Have those discussions and moderate at appropriate times (LFH2); and we should be careful of what we are talking about in assessment moderation. I believe that the whole reason for assessment moderation should be so that the markers, whether they be lecturers, tutors or teachers, can with confidence know that they are working at industry standard levels (LSB1); and this is about industry in a sense, so I think in terms of quality ... should be reflected in whether or not the graduates are taken into the industry (LSB2). University requirements were another reference point, as in the comment that I actually go and see what other universities and other colleges are doing ... what assessment they are setting for their students at bachelor level (LSB2). For at least four participants, benchmarking to ‘higher education standards’ and the AQF was important component of assessment moderation. One
of these participants claimed, for example that [we want] to be academically rigorous and that we uphold the highest benchmarks [of the Australian higher education system] as opposed to the lowest benchmarks (MFB3). Another participant said that it was important to be up-to-date with trends and ... up-to-date with industry and we are up to date with what we feel are the benchmark skills and attributes the students need to have at the completion of the course (LSB4). Over one-half of all participants made some mention of external benchmarking and of its importance to maintaining quality relative to other institutions. A general sense conveyed by these participants was that external benchmarking was important as a factor influencing the employability of graduates.

Executive staff members and managers appeared generally to be the most committed of all to benchmarking. One executive member of staff described how there was a shared understanding towards external benchmarks and the importance to registration, accreditation and industry relationships. This participant stated that as a private institution, we have been subject to regulatory scrutiny as part of our lives ... so there is a culture of you always have an eye on compliance (EFM1). Benchmarking externally against university standards seemed to be especially important to these participants. One manager, for example, stated that [benchmarking is] looking at how the course is put together and what the outcomes might be for the students. Look outside to see what other institutions are doing. And benchmark against universities (MFB2). An executive staff member claimed the key success ingredient is what you see of academic quality ... has to be rigour, benchmarked against university [standards] (EFB1). This participant also remarked on external benchmarking initiatives at his institution, which was reported to involve academic staff from Uni 1 [university named] and Uni 2 [university named] ... [came and delivered] internal workshops and professional development workshops ... which included marking criteria (EFB1). A manager from the same institution explained further that after the lecturer has marked the classes’ exams or final assessments, the top two, middle two and bottom two are sent to the University of Queensland to be validated (MFH1). Benchmarking in this setting occurred in the context of an institutional partnership, but external benchmarking against university standards also appeared to be important to executive and managerial staff members, even when there was no institutional partnership. Sometimes, benchmarking with universities took on a competitive tone, as in the comment that [benchmarking involves] competition with other providers,
rather than [an opportunity for] working together ... to build a better education system (LSB2).

Notwithstanding the importance attached by some participants to benchmarking as an assessment moderation process, accounts of actual benchmarking practices were vague and light on detail. An example here is the comment by a participant that [we] look at the resources, including PowerPoints, tutorial materials, lecture materials, additional readings. All this needs to be industry-related and must be benchmarked against the universities and other higher education tertiary level institutions and ... the marks are benchmarked against other colleges and industry (EFB1). There were also frustrations expressed about benchmarking, as in comments that what is the reference? what is the benchmark? what should we be following? (LFB1); and that the major shakeup came when AUQA visited us and asked us questions like: How do you make changes to your unit? How do you know that that unit is current? How do you know that the marks are benchmarked against other colleges and industry; ... and they asked, can you show me? And we had to answer ‘no’ (EFB1). Some participants referred to the potential for benchmarking their assessment practices and standards with other NSAIs, but they also expressed a sense of being constrained from doing so independently.

There was a widely held view among participants that assessment processes needed to be compliant with any standards set by TEQSA, but it was only among managers that there was direct mention of a need for assessment standards to be directly linked with TEQSA’s requirements. One manager referred, for example, to the need for learning outcomes, and hence assessment requirements, to reflect whichever set of requirements from the Australian Qualifications Framework was appropriate, claiming that in order to have a degree you will deliver to this level and these are the outcomes for the student at this particular level, whether you are institution x or institution y (MFB3). For another manager, compliance with TEQSA benchmarks was an important condition applying to NSAIs. This manager explained that some organisations [institutions] would be driven by their need to stay compliant in order to meet their TEQSA obligations [the five TEQSA standards] and to meet accrediting body standards (MFB2).
5.1.4 Achieving Consistency

A fourth understanding of assessment moderation was that it was about achieving consistency in the grades given to students. Consistency referred, here, to reliability and fairness. About eight participants referred to assessment moderation as being about the achievement of consistency. Illustrative comments made included that "assessment [moderation] is a process of ensuring or trying to ensure there is consistency between markers; that markers are marking according to the criteria. It is really about ensuring that the criteria are being met, the learning outcomes are assessed, and we are all [marking] at a similar level (EFB2); and [for] assessment moderation ... the aim is to maintain a consistent standard ... so that people with similar qualifications and education [are] of a similar standard ... [and] also maintaining within the organisation a standard that is consistent from semester to semester (LSB1).

Participants who saw assessment moderation in terms of achieving consistency tended to emphasise the importance of adopting an integrated perspective with regard to managing the processes of designing assessment requirements, creating assessment tasks, grading student submissions and finalising student results. One participant stated, for example, that "it all comes down to the learning objectives that have to be pursued in the assessment, [and] if the assessment is in alignment with the objectives ... so moderation comes in as a means of providing that sort of consistency in the process (LFB1). Another referred to consistency in terms of quality ... always holding the same high quality over different trimesters [study periods] (MFB1). In addition, there was a view expressed that lecturers should be in agreement about the intended learning outcomes and performance criteria for assessing student achievements, and that they should not depart from these. An executive member of staff explained that "it is really about ensuring that the criteria are being met, that the learning outcomes are assessed, and that we are all [marking] at a similar level (EFB2). A lecturer made a similar point when claiming that "[consistency] is very necessary ... I talk with the two lecturers [about] consistency so that we ensure there is equity for each cohort and across modalities ... so keeping an eye on consistency, so that the questions are at the right level, the content is adequate and up to date, and if the unit is taught by different lecturers then there is consistency (LFB1)."
Participants who referred to the importance of consistency also reported that its achievement required a focus on the quality of learning, on graduate attributes, on regulatory compliance and on the maintenance of the institution’s brand or reputation. One participant, for example, said that assessment moderation is a way that the institution ensures that assessments are robust, fair, set at the right AQF level (MFH1). For another participant, assessment moderation was important in establishing and maintaining the institution’s brand and reputation, that is, the school recognises that it needs to manage its brand and its quality ... and you need to have some level of consistency (LFH1). Another claimed that consistency of quality and reputation was critical to the maintenance of industry relationships because [these institutions] have a huge investment in themselves and quality and they need that for survival (LFH2).

Participants who referred explicitly to assessment moderation as a mechanism for achieving consistency referred also to the importance of being consistent in communicating with students about requirements, standards and the marking of assessment tasks. For these participants, assessment moderation meant asking questions along the lines of are they [the students] being treated equitably, and do lecturers have a good understanding of what constitutes a good assignment? (LSS2); and do they [the students] really relate to the brief and have they really understood the task? (MFS1). One participant commented specifically on the need to ensure that the students understood what was required of them, and how their work would be evaluated, asserting the need to provide students with a knowledge and understanding of the assessment tasks, how to undertake the task and what are the expectations of each grade (LSH1). Associated with the student briefing was the subsequent grading process, where assessment moderation was seen as a process to provide for consistency and equity and [that] you [the academic staff member] are judging it [the assessment submission] for what it is, the quality of the work (LSB4).

There were various comments made by these participants, and others, on the risks to NSAIIs from relying on casual teaching staff for the grading of assessment tasks. For those participants who regarded assessment moderation as being about the attainment of consistency, the matter was of particular concern. A manager stated, for example, that it can absolutely mitigate against consistency of outcomes for the simple reason that ... a unit [is] being taught by three different people [sessional academics] in three trimesters ... and of
course it is virtually impossible to achieve a consistency ... when there is a different tutor, and I can understand the economics of it, but as an educational practice sessional tutors are not a good idea (MFM1). Executives and managers appeared generally to be more likely to express this point of view. One executive member of staff stated that we got to the end and the moderation meeting of T 1[trimester 1] and people had come back with changed weightings and so you need to have to deal with that and luckily it was only a small number (EFM1). Another executive member complained that [he/she] had to moderate an assignment last week that a student scored 90% had the rubric and the lecturer had ticked the D box all the way down ... so a D is 85 or less, and the lecturer ticked all the D boxes, but the student got 90 (EFB2). Achieving consistency was reported to be quite difficult to manage, so having those moderation processes in place [is] vital (EFB2).

There appeared to be a relationship between attaching importance to achieving consistency in grading and a concern about maintaining institutional reputation. Members of staff who valued consistency in grading were especially concerned about what could happen to an institution’s reputation if consistency was not maintained. An executive member of staff explained that so I had about 40 emails within about three minutes ... [the assignment] had not been moderated, marks had been released and so then, he had marked way too harshly, at least ten marks off what it should have been, but, as an institution, how do you explain that to the student ... ‘you were given 13 and now I am going to give you 26’ (EFB2). Another participant recalled a disillusioning conversation as follows: ‘I know you said that you wanted to fail her, but just read it again and see if you can find a way to pass her’. So I would say ‘you are telling me you want me to pass her’ (LSS3). For these participants, assessment moderation was a high priority for the purposes of achieving quality and enhancing institutional reputation. Comments were repeatedly made along the lines that quality is definitely the number one objective for this process ... consistency in terms of quality ... always holding the same high quality over different trimesters [study periods] (MFB1); and as an institution delivering higher education qualifications, we are endorsing someone’s skill sets for employment ... moderation is one of the key activities that institutions should have been undertaking (MFH1); and my attempts to moderate the assessments, so that is a very important part of what we do and as part of our deliverables as an institution (LFH2). One lecturer also confided that the process of ensuring these assessment [tasks] are equitable or adequate has been a little bit loose, so I think there is room for improvement (LFB1).
Individual reputation was also considered by some to be associated with consistency in assessment. One executive member of staff reported that the establishment of a consistent standard was essential for academics because *at the end of the day you could stand in front of the class and say we are proud of what you have done and you are confident that you are doing the right thing* (EFB1).

### 5.2 Implementing Assessment Moderation

The interview schedule included several questions that sought to identify how assessment moderation processes were implemented at the site institutions. The first of these questions was: ‘For your position, could you explain in detail the assessment moderation practices you engage in directly?’ The second was: ‘What are the assessment moderation processes that your institution practises on an ongoing basis?’ Responses to these questions varied considerably. One participant claimed, for example, that *the only moderation I am involved in is talking with one colleague who is a supervisor* (LSB1). Another reported that *the top two, middle two and bottom two [of the completed assessment tasks] are sent to the university [partner institution is named] to be validated. However, I am not sure that that has been occurring and whether it is part of standard process* (MFH1).

Where the site institution, through its academic board or examination committee, insisted upon a particular approach to assessment moderation, the moderation processes described by the participants from that site institution tended to be aligned with what the institution required. At one site institution, an executive member of staff stated that *I chair [the examination committee] ... a quantitative moderation process [is adopted] that checks for completion, grade distribution and also the way assessments are being conducted ... at this institution we look at standard deviation as an indicator* (EFM1). Participants from this institution confirmed that assessment moderation at this institution was generally conducted in compliance with the requirements of the examination committee. At another site institution, a member of the executive team reported that *we collect a sample of assessments from all lecturers [who] send in six examples, the top two, middle two, and bottom two, to be moderated ... we would look at those to compare the top two and grade them and compare them to the top two in a different course* (EFB2). Other participants from this site institution corroborated this moderation practice. In short, if the leadership of a site institution had a
preference for a particular form of assessment moderation, and if that preference was enforced through the academic board or an examination committee, then only one type of assessment moderation was widely utilised.

If staff were not directed by management to adopt a particular assessment moderation process, various assessment practices were reported. For most of the participants at the two site institutions where a particular assessment moderation process had not been mandated, the preferred situation was that they should be able to implement assessment moderation in ways that were agreed among their colleagues. Examples of the practices reported by these participants included:

- moderation of marks is left up to the decision of the individual lecturer ... advice can be asked and that is always on an informal basis ... it has been left up to the individual academic to make the decision for themselves (LSB1);
- all the assessments that are given in my subjects, the ones I teach, the ones developed by me have been modified by me, have been not even recommended by me (LSB3);
- in about Week 1 I tell them all about the assessment and I give them a rubric, what I am expecting, sometimes I even give them a sample template and what I am expecting (LSB4); and
- as a lecturer I am here to prepare my lectures deliver my lectures around learning outcomes, and set my assessments with my learning outcomes around my teaching. For me, that is assessment moderation ... and that is my understanding (LSS2).

In one case, a sessional teacher referred to a complete lack of staff engagement with assessment moderation because we do not usually talk about assessment moderation (LSS2). Another reported on how discussion about assessment moderation was initiated, explaining that I was told by the dean, ‘do not worry about how you write the exam, it is when we are audited that the exam looks at master’s level’ ... it [assessment moderation] is not communicated nor is it a priority ... what is communicated is that you get your exams in, in the right format, by Week 8 and that is it (LSB2). A manager, who was also actively engaged in teaching, explained that if my average was, like, 72, this is not right ... I cannot have an average grade where it is nearly a D, and not even in the master’s level should it happen
there ... so then I converted all the low Ds to high Cs and so on ... I did this moderation in my own right (MFS1).

In summary, in the absence of institutional direction, many kinds of practices undertaken in the name of assessment moderation became evident. Institutional direction was evident in two of the institutions, but in the other two there was no apparent direction given.

5.2.1 The institution’s role

Fifteen of the 21 participants expressed a clear preference for their employing institution to provide the blueprint for how assessment moderation should be practised at the institution. What was intended here, though, was not always clear. One participant commented that it [assessment moderation] ties back to principles of learning and assessments so that they relate it to a framework (LSB4). Another stated I think that the framework that the organisation puts in place helps you get clarity around it (MFB2). Another claimed, the first thing is that assessment moderation is reflected in the way a course is designed and accredited ... the framework is the heart (MFS1). These expressions of expectation with regard to what employing institutions should ideally be doing did not, however, align well with one another.

Across all four of the site institutions, executive members of staff considered that their institutions did have a coherent approach to assessment moderation. For one, the approach was clearly that of ‘normalisation’. Another referred to there being two ways of approaching moderation, one being qualitative and the other being quantitative. (EFM1). Yet another referred to the marks distribution ... does it really fit the bell-curve? (EFB1). All of them, and many of their managers, were confident in asserting their institution’s approach to assessment moderation. Their literal explanations of their institutions’ approaches could, however, in some instances be difficult to comprehend, as in the explanation that it is iterative, and I tend to think it should not start at the end ... if we do it at the start, well we are all ready for it, and we agree that this is the standard that we are marking at, and [these are] the criteria we are marking towards, and this is what we agree would be a HD, D, C, P, F. That way we are all on the same starting page, and then as we go through, again there is no point in doing moderation at the end (EFB2).
All the executive staff members reported they had given their managers and teaching staff a clear sense of purpose and direction regarding assessment moderation. However, some managers expressed concern that their institutions were providing only nominal guidance or structure in the matter. One manager confided, for example, that *I do not know that it is being done terribly well at the moment. And I think people are aware of that [the situation]* (MFB3).

Members of teaching staff also expressed concerns. For some, the institution’s position on assessment moderation was unclear. One lecturer claimed, for example, that *there has never been a process ... there is no why or rationale, there is an assumption that you understand ... there is nothing written down* (LSB4); while another reported that *there is not a formal moderation process ... I haven’t seen a guideline ... what is happening actually is that we have developed or/and implemented a process which is quite rudimentary, it is not a formal process, it is not a process that was here prior to my commencement at the college, it is basically something adapted* (LFB1). At three of the site institutions, participants expressed their concerns that there was insufficient engagement by managers with the assessment moderation process. This lack of engagement appeared to be most strongly felt by sessional teaching staff members. Comments were made by these participants along the lines that *yes, [assessment moderation had been discussed], that was not by the institution but at my request* (LSB2); and *I have been left to my own devices to grade as I see fit* (LSB1); and *the processes are not being clearly communicated to sessional [staff members]* (LSB1). Full-time lecturing staff members were also concerned that sessional staff members were not effectively informed about assessment moderation. One commented, for example, that *I think that sometimes processes are not being clearly communicated to sessionals, so I think communication has been a big issue, in a series of regards* (LFB1).

### 5.2.2 Approaches to assessment moderation

Three distinctive institutional approaches to the implementation of assessment moderation were evident across the four site institutions. One involved the provision of direction by management; a second left the implementation of assessment moderation almost completely to individual members of academic staff; and a third involved a structured teaching and
learning framework within which members of staff were encouraged to exercise initiative in implementing assessment moderation.

In the first approach, assessment moderation was implemented under direction by management. It required the ‘normalising’ of student grade distributions, a process which was tightly supervised. In qualifying this approach, an executive member of staff explained that there are not too many failures [nor] too many distinctions and high distinctions (EFB1). According to participants from this institution, the need to work to the ‘bell curve’ was explained during the induction process and subsequently, and variations from this approach attracted immediate intervention by executive members of staff.

In the second approach, participants reported being able to adopt their own interpretation of assessment moderation, or, indeed, to ignore assessment moderation altogether. From one such site institution, for example, it was reported that [supervisor named] has skills in different areas that aren’t as deeply practised as ours ... she is happy for us to moderate that together ... we come to an agreement, meet on it and work out different ways, like timings, weightings and rubrics on the assessment process (LSB4). Another commented that I have simply by length of relationship and the unofficial status in this area within this college ... I have got to be very careful to get my assessment right, as I know that there is not going to be a process or supervision that will provide the checks and balances (LSB3). These participants conveyed their sense of not knowing what the institutional policy was, as well as a sense of concern about this situation. One participant disparagingly remarked, for example, that I do not think there is adequate focus on when to moderate and how moderation takes place when you have sessional lecturers (LSB4), while another expressed concern that within this institution I am not completely aware of a moderation process in a formal format (LSB1).

Some of these participants wanted to see much more of an institutional focus on achieving consistency in the way in which student performance was graded against documented standards. Some others, though, were happy not to have any form of direct supervision in terms of how they assessed student performance. One sessional staff member expressed a view, for example, that I create my own [assessment] scheme because it is more relevant (LSS1); while another seemed happy to state that what I have said I am going to do, I have not asked ‘do you approve’, I have not said I submit this for your approval, I said, this is what I am doing (LSB3).
In the third approach, which was the one most widely experienced by the participants, members of academic staff were prompted by an institutional system, process or framework to address the need to achieve consistency in the design and implementation of the assessment tasks set for students. Though they were prompted to engage in assessment moderation, no control was exercised over individuals in terms of how they practised it. Thus, one participant reported an approach whereby the key decisions were what are the learning outcomes, what is the activity, do the activities really represent ... the learning outcomes? (LSS1). Another illustrated and explained the application of Bloom’s taxonomy in the design of assessment tasks: I try always to refer to the taxonomy, to see if the verbs used are adequate and in line ... this is clearly the way that I have been approaching moderation (LFB1). For one manager, the approach was to review marked assessment tasks by taking a selection of student submissions that had been given high, middle-level and low grades to ensure that [the markers] were marking similarly (MFB3). A sessional teaching staff member remarked that you are marking them [assessment tasks] according to the marking criteria and you are providing feedback to [the students] that allows reflection by [the students] on the way they have approached the assessment task and ways they can improve (LSB4). Though no single approach to assessment moderation was prescribed, these participants had in common the fact that they exercised initiative in seeking to implement one, generally one that corresponded with a concern about achieving consistency in the process of determining final grades.

5.3 Concluding Remarks

This chapter has shown that a variety of perspectives on assessment moderation existed across the four site institutions, and consequently that there was also a great deal of variety in the practices adopted for the purposes of implementing assessment moderation. A critical factor influencing assessment moderation practices was seen to be the approach adopted by management. At the two site institutions where a ‘normalising’ perspective on assessment moderation was dominant, the assessment moderation practices tended to fall in line with management expectations. At the other two site institutions, there was more of an inclination to rely on the professionalism of the teaching staff to determine processes in support of effective moderation of student assessment practices. Executives and managers across all four site institutions appeared to believe that they were providing effective institutional
frameworks for assessment moderation, but about two-thirds of all participants maintained doubts about the quality of the assessment moderation being implemented.
Chapter 6

Influences on Assessment Moderation

This chapter reports on the importance of assessment moderation to participants from each of the four site institutions, and on the drivers and constraints they perceived as influencing the implementation of assessment moderation processes in their institutions. It focuses, in particular, on the perceived viability of assessment moderation processes at each of the site institutions, and on the extent to which the participants thought that these processes could be implemented sustainably.

6.1 The Value of Assessment Moderation

The participants were emphatic about the importance of assessment moderation in contributing to the quality of teaching and learning in higher education. Typical views expressed included that assessment moderation is a vitally important part of higher education (LSB1); and as an institution delivering higher education qualifications, we are endorsing someone’s skill sets for employment ... moderation is one of the key activities that institutions should have been undertaking (MFH1); and assessment moderation is not only important ... it is critical, as without moderation there can be no understanding of what is being done (LFB1). Assessment moderation was widely regarded as being integral to holistic quality management. An executive member of staff explained it [assessment moderation] is not potentially [important to quality management], it is essential (EFM1); while a manager said in this context that if assessment moderation was not front and centre, [then it] is pretty bloody close. It is the yardstick to ensure that we are doing the key assessments correctly (MFH1). Participants also emphasised the importance of assessment moderation in the context of institutional registration and accreditation, quality assurance, student experience and the maintenance of an institution’s reputation and brand. As one manager claimed [assessment moderation is] a very important process, because it affects ... quality. It has a huge impact on quality ... it is a constructive process [continuous improvement] that improves the quality of the education that you deliver to students and the experience that they have (MFB2).
Following the incorporation of TEQSA in 2012, and particularly after the granting of authority to this body to deregister NSAIs for failing to comply with various quality-related conditions, the importance of NSAIs being managed effectively has greatly increased. In this context, assessment moderation was widely reported by the participants as having also become much more important in the non self-accrediting higher education sector. Five participants reported how, prior to TEQSA, it had been impossible for state or territory authorities to terminate the operation of a non self-accrediting higher education institution. They said that, with the incorporation of TEQSA, all NSAIs were now subject to a review process that could potentially result in deregistration. TEQSA was therefore seen as representing a serious threat. Executives and managers appeared to be especially concerned. One executive staff member commented, for example, that we do not want to offend TEQSA, so we meet all of their requirements, but, at the same time, if we do not meet all the requirements, [then] we really do not know what is going to happen (EFB1). Not knowing how TEQSA might respond to breaches of its conditions appeared to be as much of a concern as knowing that TEQSA had the power to close down an NSAI. To an extent, the commitment to assessment moderation that was evident across all senior management levels at the site institutions was based on concerns about the possible consequences of being found by TEQSA not to have implemented assessment moderation. A manager at one of the site institutions acknowledged this situation, stating that NSAIs were [being] driven by their need to stay compliant in order to meet their TEQSA obligations and to meet accreditation standards (MFB2). Even participants not responsible for institutional management were sensitive to the threat of deregistration by TEQSA. A lecturer, referring to the challenge presented by TEQSA, reported, for example, that assessment moderation is applicable across different colleges and different disciplines which then means that at the end of the day, ensures consistency and reduces risk ... that will then lead later on to safeguarding the college from any problems we may face (LFB1).

A culture of concern about quality assurance and control was widely conveyed by participants from across all four of the site institutions. An executive staff member stated, for example, that there was now so much pressure on quality, driven by TEQSA (EFB1). This sentiment was echoed and amplified by comments from other participants who reported that: today we have to look at compliance, risk management ... we have to look at consistency, not [only] at this institution but [also] all the different colleges (LFB1); and the lecturers need to be
concerned with quality, as does there need to be an overarching support for regulatory compliance/quality (MFH1); and [because of] TEQSA, [there is] a lot more regulation and focus on the nitty gritty, which is unlike before. [TEQSA] are now involved in everything (EFB2); and [an institution’s] idea of quality [must] match at the end of the day TEQSA’s idea of quality (MFH1). In fact, TEQSA was not ‘involved in everything’, given its role as a regulator rather than as a manager of the non self-accrediting higher education sector, but what is striking was that so many participants expressed the feeling that their institution seemed to be under control by TEQSA. The effect of the change in culture as a consequence of concern about TEQSA was reported by one executive staff member as follows: it is now not ‘tick a box’, and ‘tick a box’ ... it is about proof, and providing qualitative and quantitative proof of what we are doing (EFB2).

Against this background, there was an elevated sense of the importance of assessment moderation, which was typically referred to as being central to a quality program (EFM1). Program delivery was generally perceived as being an integrated process that required a unifying framework for the curriculum, the teaching resources, the assessment tasks and the assessment grading. Assessment moderation was widely regarded as being valuable in terms of its capacity to provide this framework. It was reported, for example, that [a] good moderation process prepares individuals, capacititates those individuals, so that they can then monitor that ... quality is being achieved (MFB1). Assessment moderation was also viewed as being: incredibly important because it is not only informative for student learning, but also for informing us that we are measuring our quality correctly (LFH2).

There was widespread agreement among participants that a quality program was one that achieved its learning objectives, produced employable graduates, and utilised assessment tasks that were reliable and fair for students. A desire to be associated with a quality academic program was widely shared. Speaking on behalf of the academic staff at one of the site institutions, for example, an executive member of staff expressed the view that [the members of academic staff at the institution] do not want their reputation sullied, and that is a critical point (EFM1). For executives and managers, however, quality often appeared to be seen mainly in terms of reputation and corporate financial performance. These members of staff used expressions such as producing a quality graduate (MFB2) when referring to assessment moderation, and an investment in assessment moderation was seen as being important on
account of its potential impact on future enrolments and profitability. There were frequent references by these participants to assessment moderation in the context of NSAIs needing to make a huge investment in themselves and quality, and they need that for survival (LFH2). For teaching staff members, and especially for those employed as teachers on a sessional basis, quality was more likely to be seen as having to do with the achievement of consistency in assessment standards. One sessional lecturer referred, for example, to the need to be careful that the way in which the assessments are applied does not allow biases to creep in, it does not allow biases to creep in the formal development of the assessment, the application of the assessment and or in the marking (LSB3). Another regarded assessment to be important in avoiding [the] potential of having significant drift from what is acceptable standards (LSB1). A manager explained that assessment moderation is extraordinarily important and it is the area where you get the most flack if it is not done properly. So it [the importance of assessment moderation] is huge (MFB3). In general, though, and regardless of level of appointment, there was a view among all participants that assessment moderation is one of those big things that impacts on quality ... that improves the quality of the education that you deliver to students and the experience (MFB2).

6.2 Factors Impacting on Assessment Moderation

Assessment moderation concerns quality processes in the design, implementation, grading and review of student assessment tasks. As argued in Chapter 2, it is fundamental in many respects to the academic purpose of a higher education institution. Its implementation requires leadership, resources and accountability. An institution’s senior management team is typically responsible for addressing these requirements. Some of the interview questions sought to establish how effectively assessment moderation was being implemented at each of the four site institutions. Participants were asked about roles and responsibilities for assessment moderation, the distribution of accountabilities, the extent to which there was any check on the performance of those with responsibility for assessment moderation, the extent of reliance on sessional teaching staff members to implement assessment moderation responsibilities, the existence of statements of institutional policy and of procedures regarding assessment moderation, and the delivery of relevant training and development programs (Questions 6 to 10 in the interview schedule). These matters were raised with all participants, even though about one-half of them had no assigned management responsibilities within their institutions.
Strong themes to emerge concerned issues related to accountability, leadership, organisational culture, communication and human resource management. None of these themes stood entirely alone, and so comments made about leadership, for example, invariably also related to accountability, organisational culture, and so on. In the following account, an attempt is made to distil what was specific about each theme.

6.2.1 Accountability

All participants were invited to comment on the roles and responsibilities of individual members of staff regarding the implementation of assessment moderation at their institution. The most common view, expressed particularly by non-management participants, was that there was an overall lack of clarity about who was responsible for assessment moderation. Statements were made along the lines that *we do not know whose responsibility it is ... there is a lot of shifting going around and nobody knows who is doing what* (LSS2); and assessment moderation *is not being clearly communicated to sessionals ... I think sessional lecturers are not clear about who is responsible* (LFB1); and we have to separate formal given responsibility, that has been formalised and what actually happens ... *I am not sure that I would let it happen if I was managing the situation* (LSB3). These remarks concerned a perceived lack of clarity about accountability for assessment moderation, which, in turn, was felt to contribute to uncertainty about the process, with some full-time teaching staff members raising questions along the lines of *I have a lot of doubts about my position and I am in a situation where I understand part of my role. And when it comes down to moderation as a critical component: what is the extent of my responsibilities to moderation and what is my authority in the process?* (LFB1).

Sessional teaching staff members expressed even more concern. One sessional staff member commented, for example, that *it [responsibility for assessment moderation] is not communicated, nor is it a priority ... what is communicated is that you get your exams in in the right format by Week 8 and that is it!* (LSB2). At three of the site institutions, it was evident that neither the teaching staff members nor the executive/management staff members knew for sure what the other group was doing in relation to assessment moderation. This situation was a source of some frustration for sessional teaching staff members, one of whom expressed the view that *a lot of sessional lecturers feel that they are not included in*
assessment moderation and the actual decision-making (LSS1). A common experience was that, because of the lack of clarity regarding responsibility for assessment moderation, the process ultimately defaulted to management staff. As one full-time lecturer reported they [the management group] end up doing it (LFH1).

In fact, however, about one-half of all participants, including some who were teaching staff members, considered that it was the senior management team that should be primarily accountable for the implementation of assessment moderation. Indeed, some held that the senior management team should be solely responsible. One manager commented, for example, that responsibility [should lie with] the head of academic studies or program manager (MFS1). Another manager commented that the HAS (Head of Academic Studies) should have the academic knowledge and the authority and responsibility, to be responsible for this process (MFB1). Others contended that there should be a more collective responsibility, one manager stating that everyone is responsible ... the lecturer is definitely responsible for it, and then the program managers and the head of academic studies, and then your quality and compliance people (MFB3). This more collaborative approach accorded with the views expressed by another manager that it is a whole organisation responsibility (MFB2); and by an executive member of staff that responsibility lies with the lecturers and myself [as an academic manager] (EFB1).

About one-third of the participants were committed to the view that assessment moderation was and should be an individual staff member’s responsibility. A typical comment here was that accountability for addressing assessment moderation lies primarily with the lecturer/tutor/marker (LSB1). Some participants who were executive staff members also held this view, with one stating that it was a lecturer’s responsibility to moderate grades at the results stage, the lecturer needs to make sure grades submitted are final (EFM1), while another stated that moderation is really an academic [staff member] responsibility (EFB2). It was explained by these executive members of staff that individual members of teaching staff had to be primarily accountable for assessment moderation because they were the ones with first-hand knowledge of the assessment process and of student performance levels relative to the subject standards and achievements of previous cohorts.
The lack of clarity about accountability for assessment moderation appeared to contribute to some tension. Teaching members of staff, in particular, expressed frustration that there was not more clarity. They felt closest to the issues that are associated with student assessment, and they regarded assessment moderation as being fundamental to quality management, and as being important to implement effectively in order to support the maintenance of academic standards. Many felt that responsibility for assessment moderation was implicitly being left up to them, but they had not been formally assigned responsibility for it. Furthermore, they believed that no account was being taken of the additional workload imposed on them by the need to implement assessment moderation effectively.

### 6.2.2 Leadership and management

The need for strong leadership and management with respect to assessment moderation emerged as one of the strongest themes from the interviews. This topic had not been explicitly referred to in the interview schedule, but mention of accountability for assessment moderation boiled over in many instances into strong statements about the need for more leadership and better management. Over one-half of the participants, from across all four site institutions, and at all levels of appointment, expressed the view that successful assessment moderation was largely dependent upon there being strong and effective leadership and management. Institutional leadership was said to be critical to the development and implementation of relevant policies and procedures, and to their effective dissemination to all members of staff. Assessment moderation was regarded as requiring planning, coordination, integration and supervision, all of which were seen as requiring institutional management and leadership. Executive staff members appeared to appreciate this point. One executive stated that *I am the principal academic officer and that means ultimately I am responsible for [the] quality of the program delivery, content and resources* (EFM1). A manager, commenting on what he felt was a satisfactory state of affairs at his institution, affirmed that *I have seen organisations which are terrible and some which were terrific and it was set from the leadership and the way they inter reacted with each other* (MFM1).

Members of teaching staff were especially emphatic that senior managers needed to communicate more proactively about assessment moderation, and that they needed to implement policies more cooperatively. The management role was regarded as essential,
especially inasmuch as it involved the allocation of resources. This is because, as one lecturer commented, *if you have management who is interested in that topic, it will come to the top, while if no one is there picking it up, then it does not get solved* (LSB3). It was also felt that the implementation of assessment moderation had to be *monitored by the next level up, of academic management, and I stress academic management* (LSB1). In addition, it was reported that *managers* are trying to put systems in place for the quality management but in the process there have been cases where things have slipped through the cracks (LSS2). Another teaching staff member claimed that *it often seemed to be [that] the only way the moderation processes were raised, were problem solving, rather than planning* (LSS1). Many participants were employed casually, and so the need for strong leadership and effective management was felt by them to be all the more important.

### 6.2.3 Culture

The need for a supportive organisational culture for assessment moderation was widely referred to by participants, and especially by those engaged primarily in teaching roles. When asked if a supportive culture was important to effectiveness in assessment moderation, over one-half of all participants emphatically responded that it was. Typical responses were *definitely, there has to be a culture that says this is important to us* (MFB3); and *absolutely, absolutely, and it is really hard and this is what I found when I came here. You want to get those really good people in dialogue with other colleagues because it just lifts the game* (EFM1); and *yes and emphatically yes* (LSB3); and *there has to be a culture that says this is important* (MFB3). Participants who were executives accepted that it was their role to build this culture, but they generally hastened to add that the process needed to be inclusive. One executive staff member referred, for example, to *building the culture from the ground up so that everyone is involved* (EFB2).

The topic attracted many comments. For one participant, a manager, what was important was to have an organisational culture that involved rigorous exchange: *it is a matter of organisational culture ... test each other’s practices and standards to make sure we are delivering the best outcomes for the students ... [there] has to be a culture, not only in terms of lecturers, but it goes down to the student body, it goes back to the management, and it comes from the approach that it is part of the learning institution’s culture* (MFM1). Another
participant, who was an executive staff member, expressed the view that if you get your culture right, then when people come into the faculty ... they pick up on what is going on and this is our policy (EFM1).

There were many challenges involved in building a desired organisation culture. One of the challenges was that of achieving continuity of staffing. A manager commented, for example, that if you want a top course, which has consistent assessment and moderation practices, you need to have the same group of tutors consistently (MFM1). In this regard, problems were identified. Sessional staff members generally felt a weak sense of affiliation to the institution at which they were employed. One stated, for example, that affiliation is one’s strength of feeling towards an organisation ... the affiliation [of casual teaching staff members to NSAIs] is weak (LSB1). Another commented that it is about identification with the organisation and with things other than just what happened in my classroom (LSB3). Another conveyed a feeling of being personally and professionally undervalued, and that I am not sure that I am getting either the security, the respect, or anything else for what I am being asked to give (LSS1). In an uncertain employment environment, all sessional teaching staff members stressed a concern about never being sure where or when they might be working next. Managers acknowledged the problem, with one manager reporting contract staff have their priorities spread with other institutions (MFB1). Another manager commented [the] casualisation of the workforce ... is a challenge to quality because [the] casual lecturer who comes with the wind, goes with the wind ... that is a huge problem (MFH1). Management could, however, also make things worse, even if not intentionally. A sentiment shared by many casual teaching staff members was that there is very little mentoring ... [it is a] ‘you either perform or you are out’ type of situation (LSB2).

Another challenge concerned the process for evaluating the staff performance. It was usual for each of the site institutions to collect student feedback at the conclusion of each study period. A staff member’s engagement in a broader range of academic activities during a teaching period was not, however, taken into account. As one teaching staff member explained, the focus [here] is on the in-classroom experiences [of the students] (LSB4). It was widely perceived by sessional teaching staff members that this way of assessing the value of a staff member’s contribution was limited because it took little account of the other ways in which they contributed to their employing institution. A majority of participants reported that high
student satisfaction assisted student retention and lessened the likelihood of a loss of future enrolments, but most teaching staff members viewed the student feedback process as being a limited way of appraising professional performance and an unsatisfactory basis upon which to inform judgements about their contributions to teaching.

There was also a view that employers utilised the results as if they were a popularity contest. One manager explained the viewpoint of many sessional teaching staff members as being if I am popular with the students then I will be invited back to teach (MFH1). Another manager reported that whenever we get feedback [about] a lecturer from the students, because we do our student evaluations to get the student feedback, then we obviously immediately respond to the feedback (MFS1). Teaching staff appeared generally to be disgruntled that student feedback results could be taken so seriously, and by the fact that student failures could also be interpreted negatively. One sessional staff member expressed the concern felt by teaching staff as follows: so if you have a large number of fails, then you must be doing something wrong (LSB2). Participants who were in management positions confirmed that they understood how sessional teaching staff members felt. An academic manager, reflecting on his time as a sessional teaching staff member, commented that I was a sessional teaching staff member and I did feel like this (MFH1). An outcome of the way in which teaching staff members were appraised for their contribution to teaching was that there was a general perception of vulnerability and a reluctance to trust entirely the institutional management. It was of interest that, at the same time, managers were emphasising that good sessional teaching staff members were difficult to attract, recruit and retain.

Tensions involving sessional teaching staff members presented challenges in terms of building an organisational culture of support for assessment moderation processes. As frontline staff, sessional teaching staff members were the primary institutional contact with students. These were the staff members most deeply engaged in the processes of grading student assessments and providing feedback to students – both potential flashpoints in dealing with students. If, as appeared to be the case in some instances, the sessional teaching staff members began to take a line of least resistance, then opportunities for the effective implementation of assessment moderation could be greatly diminished.
6.2.4 Communications

The organisational and staffing structures of the site institutions involved management and supervision by full-time staff, supported by sessional teaching staff members who did most of the teaching. A strong theme to emerge from the interviews concerned communication problems with sessional teaching staff members. Participants who were employed on a sessional basis commented frequently on the extent to which their employment conditions, which saw them being remunerated only for time spent in class, resulted in their feeling excluded from discussions relating to assessment moderation. One of these participants expressed a more widely shared sentiment that *in this institution I feel a certain level of isolation* (LSB1). All sessional teaching staff members interviewed, and many of the managers, made statements along the lines that communication between managers and sessional teaching staff members was *very random because of the disconnect with the sessional lecturers who are not here on campus* (LSS1). It was also reported that *[casual teaching staff members were] not being clearly communicated to ... so I think communication has been a big issue* (LSB1); and *casuals are casuals, they are not invited to any teaching and learning committees, they have no input into curricula they have no input to course design, they have no input on assessment design or delivery, so they do not feel any ownership* (EFB2).

This theme was consistent and emotive. One casual teaching staff member commented that *there are a lot of decisions being made between managers without us and that is an issue* (LSS1), while another stated emphatically that *there has been no formal communication, unless I have missed it ... there has been no formal communication that says this is moderation and it is important for these reasons and we are adopting these moderation procedures and here is your role in those procedures* (LSB4). Sessional teaching staff participants expressed a high level of antagonism and frustration. Interestingly, communication issues were not confined to interactions between managers and sessional teaching staff members – they also occurred between sessional teaching staff members as a group, who reported finding it difficult to communicate with one another. A manager illustrated the situation by explaining that *there were three lecturers in one unit and I do not believe there is any direction that they are supposed to be liaising with the other lecturers in that unit* (MFB1).
Though aware of the problem, many participants with management responsibilities appeared to feel that little could be done to address it. As one executive member of staff reported, *where people are full-time, you can gather them together much more easily and you can plan* (EFM1). Managers often felt that decisions had to be made, even without sessional teaching staff members being involved, and communication of these decisions by means of emails was the best that could be achieved. Indeed, one executive staff member saw this process to be quite normal, stating that *issues are* *discussed at meetings and minuted, so I take that to be a formal communication* (EFS1). Recognising the limitations of this approach in the context of spreading knowledge about assessment moderation, another manager reflected that *we probably didn't communicate the process well enough* (MFM1). Participants who were sessional teaching staff members commented on the need for *a two-way street* (LSB2) in the communication process.

### 6.2.5 Human resources

Driven in nearly all cases by shareholder demands for commercial returns, non self-accrediting higher education institutions apply business principles to all aspects of their operations. One principle applied across the sector is to employ as few full-time members of staff as possible. Sessional employees, therefore, do most of the teaching. Participants agreed that *in the private education sector it is very much ... a casualised workforce* (MFB3). The view was also widely held among managers that *our pool of teaching staff are mainly casuals, so that is one of the main challenges in the private schools* (EFB1). An analysis of the staffing profiles of the four site institutions confirmed that for three of the institutions more than 80 percent of all employees were casuals, while for the fourth full-time employees accounted for no more than 20 percent of all employees.

Various reasons were given for the high level of reliance on sessional teaching staff appointments. These included that the attractiveness of programs depended, at least in part, on having practitioners with industry experience teaching in them. This rationale was often advanced as part of the institution’s verification of its value proposition for potential students. There was also a general acknowledgement and acceptance that sessional teaching staff members reduce staffing costs and assist in the control of teaching loads in the delivery of a
subject and the associated qualification. A further benefit was that sessional academic staff members could be released from employment and replaced without notice and compensation. A consistent conclusion amongst the interviewees was that the high level of reliance on sessional staff members meant that there was a constant staff turnover and a recurring need to select, employ, induct and provide training. In this regard, an executive member of staff explained, *I would say that most lecturers would stay with us for approximately one year ... the turnover rate is somewhere between 20% to 30% per annum* (EFB1).

All executives and managers interviewed commented on the difficulties of coordinating and engaging sessional teaching staff members. A representative comment from one manager was that *we have too many sessional staff and as such a high turnover* (MFH1). The ongoing process of replacing staff and providing training for new staff was reported as being problematic from the point of view of implementing assessment moderation. As stated by one executive staff member, *[assessment] moderation gets more difficult when you have a lot of newer staff on board* (EFB2). This constant staff turnover diverted management attention, activities and resources away from the core business of academic planning, delivery and quality management. This same executive staff member commented that *they [the sessional staff] do not know that they are going to be there next term* (EFB2).

Sessional teaching staff members also frequently expressed concerns about their conditions of appointment. They reported on the tenuous nature of their employment arrangements. One stated, for example, that *we are all sessional staff ... in an organisation that provides only a 10-12 week contract* (LSB2). Another commented that *as a sessional fixed-term employee, I feel that I am being asked to give continually* (LSB1). To mitigate their employment and income risks, sessional teaching staff members accepted employment at multiple institutions, which meant that they might have no strong commitment to any one of them. They also avoided getting exposed to additional administrative tasks, and to assessment moderation, because, as one full-time lecturer reported, *I am not sure that casuals get paid enough to do all of those things* (LFH1). From the perspective of the sessional teaching staff members, not offering them ongoing employment was considered to be counterproductive and short-sighted in that the institutions *want to save money but they are actually creating more problems by disconnecting our teachers from the whole thing. This is why I think moderation is at risk without having the teachers on campus* (LSS1).
Participants’ interpretations of roles and responsibilities were also influenced by the quality of human resource management practices. A significant issue concerned the way in which sessional teaching staff members were recruited and engaged. Various participants who were full-time lecturers commented on deficiencies in the way casual teaching members of staff were engaged. One lecturer stated, *it is essential to make sure when issuing contracts that people know what they have been contracted for* (LFH1). Another agreed, commenting that *it is a matter of [the] job description, [the] job design ... and there is room for improvement* (LFB1). These concerns had implications for assessment moderation. Participants who were employed on a sessional basis confirmed that their employment contracts generally made no provision for them being involved in assessment moderation. One reported that *as a lecturer I am here [only] to prepare my lectures, deliver my lectures around learning outcomes, and set my assessments with my learning outcomes around my teaching* (LSS2). Another commented that *there is an assumption that you understand you do moderation as a part of your job [but] there is nothing written down* (LSB4). Another explained the situation more graphically: *They hire me to run classes ... I feel like a hired gunslinger, so I come into town, I clear out the baddies, and I ride out on my horse. The town does not love me. I do not love the town. It is not my job to bury the bodies or clean up the bullet holes in the wall. My job is done and that is all the town requires from me and that is the extent of the engagement* (LSB3). When asked specifically about their commitment to assessment moderation, participants who were employed on a sessional basis expressed commitment to it, but questioned whether they could realistically be expected to engage in it. As one sessional staff member stated: *is this really part of my gig?* (LSB3).

While there was agreement across all participants about the importance of assessment moderation, the business model adopted by the site institutions, which is the same business model adopted by NSAIs generally, was not considered to be supportive of successful implementation. The human resource processes adopted were reported widely as being unable to provide the opportunity for individual interpretations about who should be responsible for assessment moderation. Exacerbating the problem of a reported lack of incentive for sessional staff members to engage in assessment moderation were problems associated with the nature of staff selection, staff induction and staff supervision. A major issue was said to be the fixed-term employment contract, which sessional teaching staff members felt to limit their sense of
engagement because they were remunerated for no more than their face-to-face teaching time. The strong perception that ‘administrative activities’, or non-face-to-face teaching time, represented an additional burden for which they were not compensated became a disincentive for them to engage in any non-teaching duties.

6.3 Organisational Drivers and Constraints

The participants reported amply on the challenges and constraints associated with implementing assessment moderation. One participant who had been intensively engaged with assessment moderation at one of the site institutions spoke for many when describing the current situation as *mentally challenging, and it has emotional ditches in it, and there is not a lot of obvious payback for the academic* (LSB3). This participant also referred to assessment moderation as being a resource-intensive activity, requiring *a significant workload and cost factor* (LSB3) for the institution and for individual members of academic staff. These factors were clearly of concern to participants who were executive members of staff, who fully appreciated the importance of assessment moderation but who also felt under extreme pressure to contain costs. In reflecting on the broader issues related to the decision to invest funds in assessment moderation, one participant who was an executive member of staff stated that *the main question is how much profit do they [the shareholders] want to make and do they [the shareholders] reinvest those profits* (EFB1). Having a clear resolution in this regard was clearly of immense importance to members of staff performing executive and managerial roles. As one manager explained, *if the organisation [meaning the owners] says this is a priority or this is our goal, then that makes it easier for your staff* (MFB2).

6.3.1 Economics

Across all four of the site institutions, sessional teaching staff members reported being remunerated at an hourly rate that was paid for the conduct of classes and for any other associated teaching duties. A participant in this situation expressed concern about the prospect of *increasing the workload of sessional staff who are typically only paid for their face-to-face class time* (LSB1). Other participants employed on a sessional basis made similar remarks, often reflecting on the bigger question of what the value was of continuing to be employed as a sessional. One participant commented, for example, that *you really wonder sometimes how*
much you are worth on a truly hourly basis (LSB4). Another said I keep talking to the HAS and I continue to argue, is this role sustainable? (LSS1).

Participants who were sessional teaching staff members were not happy about the prospect of having to assume additional responsibilities for assessment moderation, given that their contracts were based on hours of face-to-face teaching. One of these participants spoke with emotion on the matter and stressed that one of the biggest challenges for us, and for me it makes me particularly angry, is we do not get paid for marking ... and I said, that is just bullshit (LSS2). Six other participants who were employed as sessional staff made comments along similar lines, noting that: their administrative responsibilities were forever increasing; they were required to produce new teaching resources; there was increased demand for reporting; and their responsibilities for providing feedback to students were increasing. One reported that, to address the problem of diminishing returns, what I tend to do is, I try to limit myself to how much time can I put together [invest in administrative activities] and this is where [assessment] moderation comes into place (LSS1). Others commented that the reason for [the lack of assessment moderation] is more likely to be related to the significant workload and cost ... in moderation (LSB1); and people should be paid to moderate (LSB4); and, due to inadequate compensation for administrative duties, we will get burned out (LSS1). Participants who were full-time members of teaching staff agreed that their sessional teaching colleagues had every right to feel frustrated. One of these participants explained that there is a hell of a lot of work built into that hourly rate: preparation, marking and I do not know if moderation is included in that (LFH1). Managers also expressed sympathy, though some also expressed the view that the workload being expected from sessional teaching staff members was not unrealistic, and that making provision for assessment moderation within the workload was not onerous. A manager attempted to give perspective to the issue as follows: [regarding] casuals, if you are a very well paid casual, you think, ‘ah well I am getting paid very well,’ but if ... you get marking at $36 per hour and you are meant to mark three per hour ... that is where people cut corners, so the moderation I think is compromised (MFS1).

In general, executives and management held strongly to the position that the hourly rate of payment for face-to-face teaching was inclusive of administration associated with assessment moderation. At three of the four site institutions, members of the executive group referred to an industrial award relating to casual teaching. One reported that in that award it clearly
states that for every one hour of teaching you need to provide two hours of associated teaching time (EFB1). This award framework also referred to various hourly rates and inclusions and, as one executive asserted, it is essential to make sure when issuing contracts that people know what they have been contracted for in the headline hourly rate (EFB2). A manager confirmed that for casuals, it then comes into the teaching contract that you give them whenever they are engaged ... the sessional contract makes it clear that by taking up this offer of employment, the expectation is XYZ ... you pay a certain amount for face-to-face contact that presupposes a level of time to do the other things (MFB3). In practice, however, sessional teaching staff appeared generally to find that there was a great deal more work packaged into the hourly rate. One participant who was a sessional employee commented, I do not think that it is well moderated ... it is not financially sustainable for me (LSS1). All sessional teaching staff members, and several managers, identified a strong relationship between the face-to-face hourly rate and the lack of desire by academic staff to commit to undertaking additional administrative activities – which were regarded as including assessment moderation. An additional frustration for sessional teaching staff members was that they had to sign up for new contracts with each new teaching session.

Nearly all of the participants referred to the pressures they experienced with time management, which they reported as restricting their capacity to address matters related to assessment moderation. Three of the site institutions utilised a trimester model, that is, they had three teaching periods per annum, while the fourth institution utilised a quadrimester model, with four teaching periods. These models, whether with three or four study periods per annum, sought to maximise the utilisation of resources by minimising the duration of ‘down time’. An executive member of staff commented that time is one of the main bearers [influences] in most private colleges ... the last exam paper is on next Tuesday and the marks have to be entered by Thursday and exam board is Friday (EFB1). In this corporate environment, teaching staff members are required to meet deadlines for the respective study periods without adequate consideration or compensation. For most participants, executives, management and teaching staff, there is a great deal of associated stress. A manager commented that, at the beginning [of each study period] we were rushing around like maniacs (MFM1). Another reported that one of the biggest things in implementing assessment moderation is time (MFB3). While management at each of the site institutions sought to optimise resource utilisation, sessional teaching staff members sought to minimise their non-
teaching activities due to the time pressures to submit results and their perception of a decreasing hourly rate of pay. In this context, matters related to assessment moderation and to financial compensation began to be in conflict.

This conflict presented a significant challenge for the executives and management at the four site institutions. Assessment moderation was reported as *constantly being rushed, just for the sake of meeting compliance* (LSS1). At three of the site institutions, executive members of staff described the situation as deteriorating to a point where sessional teaching staff members were not complying with assessment moderation requirements. One executive interviewed reported that sessional teaching staff were saying, *I do not have time for this ... this is outside my money* (EFB1). Another executive member of staff reported that assessment quality was at risk, noting a perceived view of sessional staff members that ‘we just rush through these ones because we are not sure that we are going to be working there the next term’ and that is where moderation becomes even more vital (EFB2). Conversely, sessional teaching staff members highlighted that their employing institutions needed to be more responsible in terms of their budgeting practices. One participant employed as a sessional teacher commented on a need to build into their [NSAIs] cost structure a fee basis where the moderation process becomes part of the contracted work load (LSB1). Participants who were full-time members of staff commented on being able to see both sides of the argument, though, on balance, their position appeared to be that assessment moderation was placed at risk because of cost-cutting. One commented, for example, that *I am not sure that casuals get paid enough to do all of those things* (LFH1). Another expressed the general view that assessment moderation is *time consuming* (LSB3). A third full-time lecturer commented that the shift to take on only paying people for the time that they spend in a classroom shows that moderation is not important (LSB4).

### 6.3.2 Corporatisation

As reported in Chapter 3, the access NSAIs were given to FEE-HELP in 2005 contributed to a resurgence of the private higher education sector. Participants with experience of the sector reported how much more corporate it had become since then. One veteran lecturer observed that *corporate performance is now outweighing academic quality ... over the past three years,*
money and corporate [culture] has overtaken academic [priorities] ... they are seeing dollars first and quality second (LSB2).

The emphasis on profits and corporate performance was widely perceived by the participants as compromising quality processes and academic standards. Institutional management systems were said to focus too much on students as customers, and the role of the sessional teaching staff was reported to have changed. Sessional staff members reported, for example, that students are now not seeing teachers as teachers, but as customer service agents (LSS1); and that all [of the emphasis] seems to be on retention and nothing else (LSB2). An executive member of staff confirmed the increased focus on retention, stating that the retention rate has to do with profitability (EFB1). According to one participant who was a sessional lecturer, all lecturing staff members were now under a lot of pressure to provide more resources and to do a lot more things ... increased student support, answer emails, and do things that [sessional] lecturers were traditionally not expected to do, we are doing now (LSS2). In general, the participants acknowledged the need for their employing institutions to remain profitable, but they were concerned that a fixation on profit was displacing a concern about quality. There was a general level of sympathy for the view that the implementation of assessment moderation was at risk in such an environment. While assessment moderation was widely regarded as being a primary quality management process, the participants generally agreed that there was no easy way of measuring its investment benefits. Thus, quality management was seen as being drawn into question because it was seen as imposing a cost on the site institutions without there being any clear and evident revenue benefit. As one manager commented, [assessment moderation] comes back to the funding and investment (MFB1).

6.3.3 Policy and procedures

None of the site institutions appeared to have a well-documented set of policies and procedures concerning assessment moderation. At two site institutions, executive members of staff reported that there were policies available. At one of these, the policy referred only to the purpose of assessment moderation as being to ensure the ‘completeness and probity of results’ presented at the standing and moderation committee, a sub-committee of the institution’s academic board. At the other, the policy stated only that: ‘The conduct of assessment tasks
and marking are [to be] valid and reliable. The validation and moderation process is [to be] conducted annually and improvement actions recorded.’

With regard to communication processes with members of staff about assessment moderation, there was widespread agreement that the flow of communications was one-way, that is, from senior management to junior staff members. An executive from one site institution said, in communicating with staff about assessment moderation, *I do not know that it is a formal communication, but it has been emailed* (EFS1). Upon reflection during the interview, this participant commented that: *no it is not [communicated], [then reflecting and thinking about the topic stated] that is a good point* (EFM1). Further investigation with participants across the site institutions indicated that, although executives may have ‘sent the policy’, members of academic staff did not feel that they had understood, or even recognised, the communication. When asked if their institution had an assessment moderation policy, responses received were frequently along the lines of *I do not think that there is a formal procedure* (LFB1); and *no* (LSB4); and *it has not been formalised with a policy ... it is more a process which they are starting to bed down* (MFH1); and *I think it does have one, and I have seen it to a degree but I have not paid any attention to it* (LSS1); and *Agh, I am not sure but, I know that we are writing it, but I have not seen it* (MFS1); and *this institution does not have a formal moderation policy that I know of* (LSB2). One participant noted with some cynicism, however, that *yes there is a policy and yes all students know that if there are 70 students not all students can get a high distinction* (LFH2). Even more cynicism was evident in the remark by one experienced lecturer that *the word ‘moderation’ first came to my ears after 22 years in the institution* (LSB3) – meaning that any reference to assessment moderation had not occurred until the time the institution had participated in an AUQA audit.

### 6.3.4 Staff training

Many of the participants referred to the lack of staff training and development being provided by their employers. Comments made included: *I do not think there was any at all* (LSS1); and *not that I am aware of* (LFH1); *I have not seen anything, nor can I remember coming across any in other institutions* (LSB2); and *as a casual I was never really given any formal training* (EFB2). There was widespread concern that opportunities for staff training were not being provided. The view of one full-time lecturer was fairly representative: *there is room for*
improvement … let's say, even developing and training these sessionals so that they understand what [assessment] moderation is and what is their role (LFB1). Managers also recognised this need. One executive, reflecting on personal experience, observed that [we] had been given no training on how we assess, so that was a flaw in the system … training and initial orientation is crucial, is essential (EFB1). Where participants identified that there had been training about assessment moderation, they generally referred to training programs conducted by a partner institution, as in one participant’s observation that [a named institution] sent down a staff member to talk to us about how we should moderate as an institution and get our act together (EFB1). At several other site institutions, however, nobody could recollect anything as formal taking place. Representative comments were: there has not been a formal two-hour session or whatever … it has more been general discussion and workshops (EFS1); and no, not really, we agree on a structure, and we have a grading matrix (MFB2).

6.3.5 Academic governance

About one-half of all participants referred to the academic board and its overarching responsibilities in the academic governance of the institution. As stated by one manager, assessment moderation is the province of the academic board, so the academic board should sit down and think that through (LSB3). In practice, however, responsibility for generating a policy on academic governance tended to belong with the senior management, who were members of the academic boards of their institutions. The levels of interaction between the academic boards and members of teaching staff varied between the site institutions. At one site institution, the academic board was a hierarchical entity with a network of reporting sub-committees, including course advisory committees and a teaching and learning committee. At this institution, the academic board made all the final decisions regarding assessment moderation. At another site institution, however, there was an examination board that dominated the implementation of assessment moderation: all of this ends up in the exam board, where these things [assessment moderation] are looked at in detail (LFH1). At a third site institution, it was reported that when we go into the exam committee meeting, we actually analyse those results even further. And everyone takes a slightly different perspective. Some people will want to know what the difference is between the standard deviations, and other people will kind of say, ‘I am not interested in that as much as how did the lecturer mark the
assessments and are they a really hard marker or easy marker?’ and something like that (MFB2).

6.4 Concluding Remarks

This chapter has shown the dominant influences on the implementation of assessment moderation to be accountability, leadership and management, culture, communication and human resource management practices. In combination, these influences have a powerful impact on the implementation of assessment moderation at the site institutions. The chapter has also shown, however, that the implementation of assessment moderation was constrained by limitations associated with business processes associated with the business model, corporatisation, staff training and academic governance. While sessional teaching staff members were committed to the delivery of a quality student learning experience, their sense of a lack of belonging, together with a generally poor system of communications with their employers, resulted in a tendency for the development of a culture of cynicism and mistrust. Of particular interest is the extent to which none of the site institutions appeared to have communicated to staff members a detailed statement of their policy and procedures regarding assessment moderation.
Chapter 7

Conclusion

This investigation has sought to throw light on the implementation of assessment moderation as understood and experienced by 21 members of academic staff from four non self-accrediting higher education institutions in an Australian city. The research questions for the investigation were:

- How do participants in the investigation understand assessment moderation?
- What are the assessment moderation processes being employed at each of the site institutions?
- What is the value placed upon assessment moderation processes by the participants from each of the site institutions?
- What incentives and constraints are perceived by the participants as influencing the implementation of assessment moderation frameworks in their institutions?

The site institutions selected for the investigation were selected in part because they collectively have features that make this sample likely to be representative of the sector generally. Participants from within these institutions were selected to represent the typical range of experience of academics implementing assessment moderation in the context of non self-accrediting higher education institutions. The participants included four executive members of staff (one from each site institution), six managers and 11 teaching staff members, eight of whom were employed casually. Fieldwork for the investigation was completed in 2013 and 2014, using the methodology of Naturalistic Inquiry. The experiences of the participants, as captured by means of the recorded interviews and through observation, were rigorously analysed. Trustworthiness criteria were applied throughout the data collection and analysis. Themes emerging from the data were identified.

This final chapter begins with a review of the main findings from the investigation. The findings are analysed using the flowchart proposed by Mahmud and Sanderson (2011). The implications of the findings for the non self-accrediting institution sector are presented, along with a framework developed for the purposes of elucidating lessons drawn from the investigation. Finally, suggestions are made for further research.
There has to date been remarkably little systematic research undertaken in Australia regarding the application of assessment moderation in the NSAI sector, or, for that matter, in the self-accrediting university sector - the only notable publications to date being those by Tuovinen et al. (2014) and Winchester (2007). This investigation is, therefore, among the first to address the experiences of academic staff concerning the implementation of assessment moderation in the higher education sector in Australia. Though the NSAI sector now accounts for about 8 per cent of all higher education enrolments in Australia, a scholarly literature on the sector is not yet well developed, and references to how assessment moderation is experienced in the sector are rare. The participants in this investigation contributed willingly and with candour to this investigation of how assessment moderation was experienced in their places of employment. Nevertheless, all of them needed reassurance that their identities and those of their employing institutions would be kept confidential in reporting any findings. This observation goes to the heart of the potential sensitivities associated with implementing assessment moderation in the non self-accrediting higher education sector. It also possibly goes some distance towards explaining the dearth of empirical literature on this important topic.

7.1 Review of the Findings

7.1.1 How do participants in the investigation understand assessment moderation?

In the data from the investigation, participants’ understandings about assessment moderation fell into four relatively distinct interpretations. The most frequently occurring of these was that assessment moderation was a process for achieving the ‘normalisation’ of assessment grades. This interpretation was reported clearly and confidently by just over one-half of the participants. The prevalence of this understanding of assessment moderation is surprising in light of the fact that, at least at the level of institutional policy in higher education in Australia, a ‘norm-referencing’ approach to student assessment has been all but completely replaced by a ‘standards-referencing’ approach, as was explained in Chapter 2.
A second but less widely held belief about assessment moderation concerned the importance reported by participants of what they referred to as ‘complying with peer standards’. This belief was typified by reports of checking in advance with colleagues that assessment tasks were suitable, and of checking afterwards with colleagues that the grades given to students were appropriate. The emphasis among this group of participants was upon ‘peer standards’, yet the participants concerned appeared to have difficulty explaining what peer standards were, reflecting perhaps their limited appreciation of the role and importance of peer review in assessment moderation. Indeed, this group of participants seemed uncertain and not confident about their approach, and may possibly have been more comfortable with an evidence-based approach, such as is provided by a ‘standards-referencing’ approach to student assessment. There was a sense of unease in their descriptions, at the very least.

A third interpretation, also less widely held, was that assessment moderation involved ‘benchmarking’, either against standards somehow identified by the employing institution, or against standards attributed to external institutions, sometimes on the advice of an external expert. Some participants reported benchmarking their assessment tasks and grade distributions against historic data for the institution. Others reported benchmarking assessment tasks against those adopted by universities. The idea of benchmarking student assessment against industry standards was appealing to some participants, but no actual examples of this kind of benchmarking were provided. As a consequence, participants’ explanations of ‘benchmarking’ were inconsistent.

A fourth interpretation of assessment moderation was that its purpose was to achieve ‘consistency’ in the student assessment process. This interpretation was the second-most popular way of describing assessment moderation, expressed by over one-third of all participants. The ‘consistency’ interpretation seems to align best with a ‘standards-referencing’ approach to student assessment in that those advocating ‘consistency’ reported that student assessment should be referenced against a set of intended learning outcomes for students, that the curriculum content and the method of its delivery should be consistent with the intended learning outcomes, and that the grades students are given for assessment tasks should indicate truthfully and fairly the standard of their performance in attaining the intended learning outcomes. It was striking, though, that so few of these participants were able to relate this interpretation of assessment moderation to a ‘standards-referencing’ approach to student assessment.
assessment, indicating poor understanding of standards-based assessment among this group. Further, it reflects a widespread lack of sophistication in knowledge about student assessment that was evident across the whole of the 21 participants. These participants seemed to latch onto the notion of ‘consistency’ as a term that best described how they thought about assessment moderation. Not surprisingly, participants referring to the importance of ‘consistency’ were generally more likely to emphasise also the importance of treating students equitably in the student assessment process.

These four interpretations comprise varied principles in relation to assessment moderation. The strength of the ‘normalisation’ interpretation is of particular interest, given the extent to which this interpretation does not form any part of the ALTC model of assessment moderation. The other three interpretations tended to share some overlapping values, with the ‘consistency’ interpretation closely approximating the ALTC model.

Of note is that as many as one-half of the participants seemed comfortable with having several interpretations of assessment moderation, which was interesting for two reasons. First, at two of the site institutions there was strong direction given that a policy of ‘normalisation’ should be followed, which participants at these institutions followed, even though they may not have personally believed in it. Second, very few of the participants were familiar with the ALTC model, and so its influence as a reference point for explaining personal perspectives on assessment moderation was negligible.

Table 7.1 below presents a matrix showing how each of the four interpretations of assessment moderation aligns with the three phases in the ALTC model. As documented in Chapter 2, Phase 1 of the ALTC model concerns assessment design and development; Phase 2 concerns assessment implementation, marking and grading; and Phase 3 concerns the review and evaluation of assessment outcomes. The first interpretation of assessment moderation, concerning ‘normalisation’, corresponds with Phase 2, because ‘normalising’ requires no more than the allocation of grades according to a predetermined distribution. The second interpretation, concerning ‘peer standards’, corresponds with Phase 1 of the model, given that scrutiny by peers was considered important in the design and development of assessment tasks, and with Phase 2, given that peer scrutiny was also considered to be important when determining final grades. The third interpretation, concerning ‘benchmarking’, corresponds
with Phase 1 only, because it requires only that there should be benchmarking in the design and development of assessment tasks. The fourth interpretation, concerning ‘consistency’, corresponds with Phase 1, because it requires assessment tasks to be designed and developed in line with prescribed student learning outcomes; it also aligns with Phase 2, in that it requires the final grade distribution to be consistent with performance standards that relate to the achievement of prescribed learning outcomes. None of the four interpretations addressed Phase 3 in the ALTC model; that is, they had nothing to say about the review and evaluation of assessment outcomes.

Table 7.1 Correspondence between the ALTC (2010) Model and Participant Interpretations of Assessment Moderation

<table>
<thead>
<tr>
<th>Category</th>
<th>Phase 1: Assessment design and development</th>
<th>Phase 2: Assessment implementation, marking and grading</th>
<th>Phase 3: Review and evaluation of assessment outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Normalisation</td>
<td></td>
<td>Conformity of final grade distribution with predetermined distribution model</td>
<td></td>
</tr>
<tr>
<td>Peer Standards</td>
<td>Comparability of assessment requirements with peer approaches</td>
<td>Comparability of grading outcomes with peer standards</td>
<td></td>
</tr>
<tr>
<td>Benchmarking</td>
<td>Comparability of assessment requirements with benchmarks</td>
<td>Consistency of grades awarded with expected learning outcomes</td>
<td></td>
</tr>
<tr>
<td>Consistency</td>
<td>Consistency of assessment requirements with expected learning outcomes</td>
<td>Consistency of grades awarded with expected learning outcomes</td>
<td></td>
</tr>
</tbody>
</table>

7.1.2 What are the assessment moderation processes being employed at each of the site institutions?

According to all of the participants in the investigation, assessment moderation processes were variously implemented across the site institutions. At two of the site institutions, however, the academic board had prescribed the adoption of a ‘normalisation’ approach, and so at these institutions assessment moderation mainly took the form of ranking all of a student
cohort’s initial marks for an assessment task and then adjusting them so that they resembled a predetermined, ‘normal’ grade distribution. At the remaining two site institutions, where no single approach to assessment moderation had been prescribed, there were many processes reported as being implemented for the sake of assessment moderation. In one instance, for example, a small group of sessional staff members routinely compared past assessment tasks with current assessment tasks in an attempt to achieve benchmarking. In another example, individual staff members sought to align the grades awarded with student success in achieving the designated learning outcomes for a unit – explaining that what they were seeking to achieve was ‘consistency’ in the distribution of grades awarded in their units. The assessment moderation processes documented from these institutions appeared often to reflect the preferences and experience of individual managers and longer-standing full-time lecturers.

7.1.3 What value is placed on assessment moderation processes by the participants?

Assessment moderation was widely reported to be of very high importance by participants, most of whom linked its importance with the reputation of their institution. Overall, it was seen as being an essential quality management process for a higher education institution. It was said to provide a structured process that complemented the full range of tasks associated with preparing and delivering a subject during a study period. It was regarded as being intrinsically important, in the sense that assessment moderation is a vitally important part of higher education (LSB1); and as an institution delivering higher education qualifications, we are endorsing someone’s skill sets for employment ... moderation is one of the key activities (MFH1); and assessment moderation is not only important ... it is critical, as without moderation there can be no understanding of what is being done (LFB1). It was also regarded as being extrinsically essential. Most of the participants referred to the need to accommodate TEQSA’s compliance requirements, even though few of them appeared to know what those requirements were. There was also widespread concern reported by participants across the four institutions to avoid reputational damage to their institutions through any slip-ups or areas of neglect associated with implementing assessment moderation processes. It was evident that the participants appreciated that their employment prospects were closely tied to the continuing financial viability of their institutions.
7.1.4 What incentives and constraints are perceived by the participants as influencing the implementation of assessment moderation at their institutions?

The incentives influencing the implementation of assessment moderation included, as referred to above, some that were intrinsic and some that were extrinsic. In addition, academic boards played an important role at two of the site institutions where the respective boards had expressed a forceful stance on assessment moderation – in both cases, somewhat regrettably, favouring ‘normalisation’ of student grades. At the other two site institutions, the academic boards were much less directing, though in one case there was an academic board policy that required assessment moderation to have been completed at the course level and prior to the submission of final grades for approval by the academic board. As many as two-thirds of all participants claimed that they wished their academic boards would provide strong direction about how assessment moderation should be implemented at their institution. Two executive members of staff in the investigation reported that the academic board at their institution did give such direction, but at all but one of the site institutions there was a widespread view among teaching staff members, and especially among those employed on a sessional (and often part-time) basis, that the management did not provide them with sufficient direction to enable them to know how to proceed. Full-time lecturing staff members also expressed concern that sessional members of staff were not being informed effectively about the implementation of assessment moderation.

The quality of communications between management and teaching staff appeared generally to be a considerable constraining factor in terms of the effective implementation of assessment moderation processes. All participants who were sessional staff members, and more than one-half of the full-time staff and management staff, expressed the need for better two-way communications within their institution. It was generally perceived across the institutions that senior management was directive rather than consultative in its style of communication with staff members. Participants described their senior management as relying on minutes of meetings and excessively bureaucratic emails as the primary means of communication with staff members. Compounding the problem of poor communication in the institutions was the widespread claim that sessional teaching staff members were irregular in their attendance at the institutions, given that they were only being paid for face-to-face teaching. As a result, the
opportunities for them to communicate in person with their managers, or even with each other, were said to be intermittent.

Of particular note was that there was little evidence provided by participants or in related institutional documentation that any training on assessment moderation was provided for academic staff members at any of the site institutions. Well over one-half of all participants indicated that they had received no training in assessment moderation, and it was further claimed that this situation was not unusual in the NSAI sector at large. Several participants reflected upon attending induction programs upon their appointment to their institutions, at which some reference was made to assessment moderation, but participants were clear that these were not staff development activities focusing on assessment moderation.

An important theme in the comments of the participants was a range of concerns stemming from the heavy reliance of NSAI's on the employment of sessional teaching staff. Nobody seemed to be happy with this situation; its existence was frequently referred to as being an impediment to assessment moderation. Executives and managers were unanimous in highlighting the challenges of selecting, recruiting, managing and retaining a highly casual work force. At all four of the site institutions, over 80 percent of the teaching staff were employed as sessional appointments, and a high turnover of as much as 30 percent annually for these appointees was reported by management staff members. Executives and managers contended that they had to spend too much of their time on recruiting, appointing and inducting the steady flow of new sessional staff. Participants who were employed on a sessional basis reported that they did not feel that they were included in the organisational culture. Furthermore, they described being constantly aware of the tenuous nature of their employment situation. These participants explained their reticence about investing heavily in administrative tasks, which in a number of instances was how they saw assessment moderation. They were generally not convinced that their pay rates were sufficient to cover the additional time requirements for attending to the implementation of assessment moderation processes.

An additional and related concern was the overwhelming perception by all of the participants that there was a lack of clarity at their institutions about whose responsibility it was at the individual subject level to be responsible for implementing assessment moderation. As many
as one-half of all the participants considered that managers should take responsibility for implementation, but this view was not shared by another one-third of the participants, including many managers, who held that the individual lecturer responsible for the delivery of a subject should be responsible for implementing assessment moderation. The general lack of clarity about this matter appeared often to contribute to tension and uncertainty. Some participants reported that these tensions could develop into resentment about how, in the context of a profit-driven culture, quality and integrity were compromised, where students became ‘customers’ and members of teaching staff became ‘customer service agents’.

7.2 Implications of the Findings

The findings of this investigation point to a possible framework for conceptualising the different elements involved in effectively implementing assessment moderation in the organisational setting of non self-accrediting higher education institutions in Australia. The framework draws on a model proposed by Waterman, Peters and Phillips (1980), known as the ‘McKinsey 7-S’ framework, for the implementation of business strategies in institutional settings. The implementation of business strategy is a complex and integrative activity that requires an organisation’s leaders co-ordinate and integrate the organisation’s tangible and intangible resources. From using the findings of this investigation, and adopting the McKinsey 7-S framework, it may be argued that assessment moderation is a strategic undertaking by an institution that requires the integration and co-ordination of a broad arrangement of institutional and people elements.

The McKinsey 7-S model emphasises that, as management successfully integrates its strategic activities, the organisation progresses and optimises performance through the creation of ‘shared values’ (Waterman et al., 1980). The more effective the communication of and engagement with the organisation’s vision mission and goals by the leaders, the stronger will be the ‘shared values’ and staff commitment to the corporate objectives. Within the NSAI sector, it is a responsibility of the institution’s academic leaders, the academic board, its associated committees and the senior academic staff to articulate clearly the mission and strategy of the institution. The specifics of the institution’s objectives or goals determine the function and contribution assessment moderation as part of the quality management processes. Sharing a similar foundation with business strategy, it is only through the
definition of the institution’s quality management objectives that the academic staff members are able to engage with and implement the institution’s policies and procedures for assessment moderation.

As shown in Figure 7.1, there are seven mutually interactive elements that together support the implementation of assessment moderation processes. Implementation of assessment moderation requires that the institutional strategy should complement the initiatives of the institution’s academic staff, the application of tacit knowledge and the realisation of shared values. Without all elements functioning effectively together, assessment moderation processes seem unlikely to be able to function properly.

**Figure 7.1 A Framework for Analysing Assessment Moderation in the NSAI Sector**

Three of these elements, that is, effective governance in terms of policies and procedures, appropriate investment in outcomes, and effective staff development and training, are
essentially institutional responsibilities that support individuals in implementing assessment moderation processes. The individual actors concerned must concomitantly make four related sets of commitments. One is for individuals to take responsibility for their part in implementing assessment moderation. Another is for institutional leaders to exercise leadership in relation to implementing assessment moderation and continuously reviewing it for improvement. The third is for open and effective channels of communication from the top down and the bottom up. And the fourth is an academic culture in which assessment moderation is valued and understood, and to which academic staff members are committed.

Encompassing and influencing all institutions is the national regulatory framework for higher education which circumscribes all of these elements. In Australia, it is TEQSA, on behalf of the Commonwealth Government, that mandates the need for assessment moderation, prescribes the form it should take, and enforces compliance with national requirements.

### 7.2.1 Institutional Characteristics

In Figure 7.1, three elements are identified as the institutional characteristics impacting on assessment moderation. These relate to an institution’s organisational character rather than to the personalities and behaviours of individual members of academic staff.

The first of these elements concerns governance. At each of the site institutions investigated herein, an academic board had been established with responsibility for academic governance, including in relation to the development and approval of academic policies relating to student assessment and its moderation. Each of the academic boards was also responsible for ensuring compliance with national higher education regulatory requirements regarding the quality of academic programs. In practice, however, it was only at two of the four site institutions that it was clearly evident that the academic board had formulated an approach to assessment moderation. In both cases, the approach formulated was that student grades should be fitted to a pre-determined grade distribution – a process referred to by the participants as ‘normalisation’. The academic boards at the other two site institutions had not developed any explicit policies, though at one of them the unwritten policy appeared to be that assessment moderation was to be completed at the course level. In these two cases, then, the academic staff of the institutions concerned implemented assessment moderation according to their own understandings of what was required. In this regard, it is relevant to recall that, in Chapter 2, it
was reported that only 33 NSAIs, out of 138 whose websites were reviewed early in June 2014, appeared to have developed a published set of assessment moderation policies. An important implication of the findings from this investigation, therefore, is that academic boards at all non self-accrediting higher education institutions in Australia should be expected to have a published statement of policy regarding their institution’s approach to assessment moderation. The participants in the present investigation were strongly inclined to look for more institutional direction regarding assessment moderation.

The second element concerns the importance of a realistic investment of resources in assessment moderation. The site institutions for this investigation were, like nearly all of the non self-accrediting higher education institutions in Australia, private and for-profit providers. Participants believe that the business model adopted sought to minimise costs through the employment of sessional academic staff whose responsibilities were simply to engage in face-to-face teaching and to mark assignments and examination scripts. Although they said they were committed to the value of assessment moderation, the sessional teaching staff members who participated in the present investigation were generally not convinced that their role extended to being engaged in assessment moderation, which they saw as being an additional administrative task. Furthermore, they generally described themselves as having a weak sense of affiliation with the institutions employing them, largely because they felt no sense of certainty about their employment. It was not evident at any of the four site institutions that additional funds were being allocated to support assessment moderation. Executives and some of the managers were inclined to consider that assessment moderation could easily be accommodated within existing workload allocations, and was implicitly a part of the duties of sessional teaching staff members – though this requirement was not explicitly documented. From this investigation, then, it is apparent that a business model within which there is not a deliberate allocation of funds to provide the resources required to implement assessment moderation effectively, and in which there is a high level of reliance upon sessional academic staff and fixed-term contracts, will not be conducive to the comprehensive implementation of assessment moderation processes.

The third element concerns staff development and training. Assessment moderation requires all members of academic staff, whether engaged in management or teaching, to receive training about the nature of the relevant processes and the ways in which it should be
implemented. At none of the site institutions was formal training or professional development being provided. The closest approach to staff training was evident at two of the site institutions where it was reported that members of academic staff met to ‘blind mark’ student assessment tasks and then have discussion about each staff member's approach to grading. The stated purpose of these meetings was to align the grading of assessment tasks through discussion and debate; however, participants explained that these meetings were of limited value to the implementation of assessment moderation and in some instances the meetings became adversarial. At one site institution, it was recounted that there had been visiting guest speakers from partner universities who made presentations on student assessment and assessment grading. Participants commented that there were limited benefits from this experience because attendance at such presentations was poor due to the limitations of trimester and quadrimester teaching schedules. Participants also stated that during study breaks they were expected to prepare for the following study period. An additional limitation on staff attendance at training and development sessions was that sessional staff members were committed to other employment at those times in order to supplement their incomes. Clearly, staff training and development about assessment moderation is an essential aspect of success in implementing an institutional assessment moderation framework.

7.2.2 People Characteristics

In Figure 7.1, four elements are identified as the people characteristics impacting on assessment moderation. These relate to the human engagement and behaviour of individual members of academic staff.

The first element here is leadership, which is primarily a responsibility of executives and managers. All of the participants expressed the view that implementing assessment moderation depended upon there being strong leadership. Interestingly, full-time and sessional academic staff members described leadership as being provided by the academic board or governance, as well as by executives and managers. Participants expected that the academic board should designate particular quality management processes; that the executives and managers should co-ordinate these processes; and that, in turn, academic staff members would undertake the activities required to implement assessment moderation processes. At one site institution, where the academic board and executives expressed a strong commitment to a particular framework, the academic community was said to be clear about the
expectations placed on it and willing to become involved in the assessment moderation implementation process. At the other three institutions, however, the sessional academic staff participants expressed the view that there was a lack of leadership. Academic staff strongly argued that, in order to implement assessment moderation, strong commitment and direction from their leaders is essential. By all reports, the influence of the leadership is not limited to formal policies, procedures and directives, but includes contribution to discussion at staff meetings and an ongoing commitment to professional development and training of academic staff regarding the institutional framework and processes for implementing assessment moderation.

The second element concerns academic culture, that is, the framework of shared attitudes, beliefs and values that individuals share and that form the basis for social cohesion. At the site institutions, there was an evident tension in each academic culture between the pursuit of profit and the attainment of quality. More than one-half of the participants, particularly the sessional academics, expressed concern about academic integrity and the quality of student learning. They perceived that an overriding emphasis was being placed on the importance of attracting large numbers of students and retaining them to make the enterprise viable, rather than upon the quality of the learning experience and outcomes. Indeed, more than three-quarters of all participants reported overall on the importance of student retention and customer satisfaction with the teaching methods. Three very different site institutions shared an academic culture with which sessional academic staff members reported feeling disconnected from the institution and that their individual contributions to academic quality was neither recognized nor valued. The perceived tension between the priorities of profit and academic quality may present a serious challenge to the NSAI sector at large.

The third element is effective organisational communication, which is essential to all of the other elements presented in Figure 7.1. As reported in Chapter 6, a consistent theme reported in the interviews was the lack of effective institutional communication at the four sites. At each of them, there was a small group of full-time academic staff members who reportedly made time for informal discussions. With such a large proportion of all members of staff being sessional, only visiting campus for face-to-face teaching time, communication between management and most academic staff members fell to ‘contact by exception’, that is, where communication only occurred when problems or issues arose. Even when opportunities for
meeting formally were scheduled, attendance was poor because the time required for meetings were not covered by workload realities. In these circumstances, executives and managers said that they resorted to email as the primary form of communication with sessional academic staff members. An effective and consultative institutional communication system is required if institutional values and priorities are to be widely shared and adopted, and including those pertaining to assessment moderation.

The final but critical element concerns determination of responsibility, or accountability, for assessment moderation. As detailed in Chapter 6, a majority of participants expressed a clear lack of knowledge about who was responsible for which processes in the institution assessment moderation framework. There was a general sense that the academic board should take responsibility for the promulgation of an assessment moderation framework. Beyond that, however, there was a lack of understanding about who was responsible for what processes and activities constituting the assessment moderation framework in the institution. It seemed that the various beliefs about assessment moderation responsibility derived from the different perceptions of what assessment moderation constitutes. There is obviously a need for an explicit assessment moderation framework to which an NSAI can adhere, and to which its staff members can commit, which is the responsibility of the academic board.

### 7.2.3 Application of the Assessment Moderation Framework

The framework for analysing assessment moderation presented in Figure 7.1 may be used as a guide for the implementation of assessment moderation by an NSAI. In utilising the framework, an institution might initially evaluate the ‘institutional issues’, and then consider the ‘people issues’. Addressing the ‘institutional issues’ might start with a review of how the academic board defines and gives expression to an understanding of the institution’s quality management framework, and, within this framework, the importance of systematic assessment moderation. Fundamental to an institutional quality management framework is the development, articulation and promulgation of policies, guidelines and procedures that clearly specify responsibilities for processes and activities and lines of accountability. To support the policies, guidelines and procedures, an ongoing scheme for professional staff development and training is essential.
The common issue for all teaching staff members was the resource allocation for staff training and development. All participants acknowledged the considerable resources required to instigate effectively the activities and processes required for implementing an institutional assessment moderation framework. In this matter, the element of leadership becomes critical. Executives and managers are, however, in a compromised position. They are the ‘meat in the sandwich’ between the profit objective and the regulatory framework of a quality assurance imperative. Showing strong leadership in these circumstances is an extremely delicate balance.

7.3 Limitations of this Research

There are limitations in completing ethnographic research, and, for this investigation, several of these limitations may be identified. The first concerns the representativeness of the sample in relation to the NSAI sector. As detailed in Chapter 3, the NSAI sector includes a diverse collection of institutions that award qualifications across a broad range of scholarly disciplines. The enrolment size of these institutions ranges from 50 to more than 3000 students. Though the site institutions for the present investigation all had more than 200 students enrolled, they could not be said to represent the sector as a whole. The second limitation relates to the purposive nature of the sampling of participants. As documented in Chapter 4, the participants were selected on the basis that they were likely to provide rich and informative data relating to the research questions for the investigation. The participants may not, however, be representative of all of the academic staff at the NSAIIs included in the sample group. Furthermore, they may not be representative of the range of experiences of all academic staff members working across the NSAI sector in Australia. The third limitation concerns the preparedness of the participants to provide complete and accurate information directly relating to their employment experiences. The tone of the interviews strongly suggested that the participants were providing their views to the researcher in a way that was open and honest – however, no verification in this regard was possible, though the process of triangulation, as described in Chapter 4, provided a basis for confidence.
7.4 Further Research

This investigation raises for consideration some new avenues for investigation. The non self-accrediting institution sector continues to expand, yet there is a limited empirical research literature concerning its quality assurance and management. The present investigation has identified key concerns in quality assurance and management in the NSAI sector. Several important areas for investigation are now suggested.

First, there is a pressing need to understand better the concerns of executive management in NSAIIs. In particular, there is a requirement to document the issues, claims and concerns of NSAI executive managers concerning externally imposed quality assurance, and especially assessment moderation, requirements. As Harris and Simons (2012, p.31) identified in the VET sector, leaders from all registered training organisations were quick to expand on the challenge of realising educational leadership in their work, and on how they worked to juggle it alongside other mainly commercial imperatives. Similarly, there is a need to document the experiences of executives and management in addressing the sharp tension that is probably experienced between the priority of financial viability and priority of maintaining and advancing the attainment of academic standards.

Second, the experiences of the sessional staff members in this investigation were salutary. In general, many institutional expectations existed regarding their roles and responsibilities, but these participants overwhelmingly and stridently argued that their workloads did not accommodate administrative tasks, such as curriculum development or assessment moderation. Therefore, any further investigations into the experiences of sessional staff members in NSAIIs should be most illuminating.

Third, quality assurance matters, although sensitive on many levels, need to be empirically investigated across the Australian higher education sector more broadly. Australian universities have had a longer exposure than NSAIIs to audit reviews by AUQA. If they are to attain the highest international standards, they will need to have the processes whereby they implement assessment moderation critically reviewed. To date, evidence of their success in implementing assessment moderation is sparse.
References


Appendices

Appendix 1: Ethics Application

Human Research Ethics Committee (HREC)
Human Research Ethics Sub-Committee (HRESC)
(Lismore, Coffs Harbour, GC/Tweed)

EXPEDITED REVIEW APPLICATION FORM
LOW and NEGLIGIBLE RISK RESEARCH

Applicant/Researcher’s Name: David McDonald
Supervisor’s Name: Prof Martin Hayden
Date of submission: July 2012

INSTRUCTIONS – HAVE YOU READ AND DO YOU UNDERSTAND THE FOLLOWING?
Ensure that you do, before submitting an expedited ethics application.

Section 1 and 2 of this form are protected, so that the questions can be answered in Microsoft Form mode.
Section 3, 4, 5 and 6 are not protected.

1. Before completing this application form, have you read the National Statement on Ethical Conduct in Human Research? (National Statement or NS)

2. An ethics application for ‘Expedited Review’ can be submitted at any time to the ethics office at the Lismore, Coffs Harbour or Gold Coast/Tweed campuses. Addresses listed below.
All applications which are expedited and approved by the delegated HREC authority are ratified by the full HREC. If there are any queries from the full HREC, the researchers are obliged to comply with these.

3. Information specific for participants to consent to research. (NS 2.2)
Specific information about a research project MUST ALWAYS be provided to participants so that a person’s (NS 2.21) decision/consent to participate in research is to be voluntary, and based on sufficient information and adequate understanding of the proposed research and the implications of participation.
This requires an adequate understanding of the purpose, methods, demands, risks and potential benefits of the research.
This information must be presented in ways suitable to the particular research project.
For example, some inclusions might be:
- The name of the project;
- An introductory paragraph including details of who you are, what you are studying (if applicable) and your position within the University (current status - eg lecturer, Honours student, PhD, Masters)
- An explanation (in plain English) about the subject of your research, its purpose and aims;
- Explanation of what will be required of the participants in this research;
- Any risks, inconveniences, discomforts which participants may experience;
- Details of the estimated time that it will take the participant to complete the research (including the opportunity of taking a break if required);
- Details about the likelihood and form of publication of the research results;
- That participation in the research is voluntary;
- Advice to the participant that he/she may withdraw at any time without any negative consequence to him/her;
- Provision of services to participants adversely affected by the research (if applicable to your research project);
- Details of how the anonymity / or confidentiality of any information provided by participants will be ensured;
- Details of how adequate security will be provided for the research data and that information gathered by the University is kept for 7 years at the University;
- Inclusion of the researcher(s) and supervisor’s (if applicable) contact details;
- The ethics approval number – once it has been received;
- Details of the University Complaints policy.

See sample information sheets and consent forms available from the website.

4. One copy must be sent electronically to the appropriate ethics office. As signatures must be obtained, then either a full copy is sent through the mail or the separate signature pages can be faxed or scanned and sent to the ethics office. An electronic signature is acceptable.

5. You must not make contact with any participants or begin the data collection component of your research until you receive an ethics approval number.

6. Email addresses are: ethics.lismore@scu.edu.au, ethics.coffs@scu.edu.au; or ethics.tweed@scu.edu.au

7. Mailing addresses are:
   Sue Kelly
   Human Research Ethics Office
   Division of Research, R3.15
   Lismore NSW 2480
   P: (02) 6626 9139 F: (02) 6626 9145

   Meg English
   Secretary, HRESC, Coffs Harbour campus
   Room B.1.9, Coffs Harbour Education Campus,
   Coffs Harbour NSW 2450 P: (02) 6659 3365 (Tuesday and Thursday)
**SECTION 1 – ETHICAL CONSIDERATIONS**

Please answer the following questions. *(Click on the boxes and an X will be inserted)*

<table>
<thead>
<tr>
<th>1.</th>
<th><strong>Reason for Expedited Approval</strong></th>
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<tr>
<td></td>
<td>Please select the reason/s why you consider this application can be given expedited review for approval <em>(please mark all the relevant boxes – more than one may apply)</em>:</td>
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<td></td>
<td>(a) Data obtained is anonymous or will be held confidentially</td>
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<td></td>
<td>(b) The research plan is safe and poses low/negligible risk to participants</td>
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<td>(c) The research plan is safe and poses no risk to the researcher</td>
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<td>(d) The research does not involve the participation of vulnerable groups</td>
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<td>(e) Other, (please specify)</td>
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<th>1a</th>
<th>The nature of this project is most appropriately described as involving:</th>
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<td>- Observation</td>
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<td>- Questionnaire/s, Survey/s <em>(please attach a copy)</em></td>
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<td>- Interviews</td>
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<td>- QA/Evaluation surveys</td>
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<td>- On-line data collection</td>
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<td>- Focus groups</td>
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<td>- Experiments</td>
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<td>- Other (please specify)</td>
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<th>1b</th>
<th>Do you consider this research Low/Negligible Risk to participants? <em>(refer to the National Statement on Ethical Conduct in Human Research) (NS Section 2) <a href="http://www.nhmrc.gov.au/guidelines/publications/c72">http://www.nhmrc.gov.au/guidelines/publications/c72</a></em></th>
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<td><em>(If your answer is NO, then your research is not suitable for expedited approval. You must submit the National Ethics Application Form [NEAF], available at <a href="http://www.neaf.gov.au">www.neaf.gov.au</a>)</em></td>
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<th>Is this a new project?</th>
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<td>If NO, please advise relevant details of the previous project, such as the name of the Ethics Committee, the Ethics Approval Number and the month/year of review.</td>
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<td>YES</td>
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<th>3</th>
<th>Is this a project which has received external ethics approval and now requires Southern Cross University ratification? Please use the Minimising Duplication of Ethical Review form, available at the Research Ethics website as a Downloadable Form.</th>
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<th>4</th>
<th>Is this project currently before another ethics committee?</th>
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<td>If YES, which committee?</td>
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<th>Does the research involve any other institution <em>(such as a hospital or school)</em>? If YES:</th>
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<td>(a) What is the name of the institution?</td>
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<td>(b) Does the institution require ethical approval from its own ethics committee?</td>
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<td>(c) If YES, has that approval been obtained?</td>
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SECTION 2 - ADMINISTRATIVE DETAILS

6. Title of project: Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia.

7. Estimated commencement date: July 2012

8. Expected duration of the project (months) and/or completion date: 12 months. Completed by July 2013.

APPLICANT/S

9. Principal Researcher/Investigator (Main Researcher/Student/Staff Member and applicant)

   Name: David McDonald
   Qualification/Status: Post Graduate Student
   School and degree being undertaken (if applicable): Doctorate of Business Administration - Southern Cross Business School
   Phone No: 07 5589 3043
   Email address at Southern Cross University: d.mcdonald.20@scu.edu.au

   Additional Researcher/Investigator
   There are no other researchers in this project

10. Supervisor/Person Responsible*: (NS 5.1.2) (Not required where the Principal Researcher/Investigator [above] is a staff member of the University)

   Name: Professor Martin Hayden
   Position: Head of School
   Qualifications: BA (Monash), MEd (Monash), PhD (Melb)
   School/Centre: Education
   Phone No: 02 6620 3160
   Email address at Southern Cross University: martin.hayden@scu.edu.au

11. FUNDING (NS 5.2.7)

   Have you (or your supervisor if applicable) received or applied for external funding or sponsorship for this research? NO

   If YES:
   (a) What is the name of the funding organisation?
   (b) What are the details of the funding or sponsorship (including details of any in-kind contribution)?
   (c) Amount of external funding/sponsorship: $
   (d) Value of in-kind contribution: $
   (e) Other details:

   11.1 Are there any conditions or restraints on the research as a result of the funding arrangements (eg. intellectual property, publication of results) (NS 5.2.11) NO

   (a) If YES, please state the nature of the conditions and/or restrictions:
Appendix 2: Ethics Approval

HUMAN RESEARCH ETHICS COMMITTEE (HREC)
HUMAN RESEARCH ETHICS SUB-COMMITTEE (HRESC)

NOTIFICATION

To: Professor Martin Hayden/David McDonald
Southern Cross Business School
martin.hayden@scu.edu.au,d.mcdonald.20@scu.edu.au

From: Secretary, Human Research Ethics Committee
Division of Research, R. Block

Date: 4 July 2012

Project: Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia.

Approval Number ECN-12-168

The Southern Cross University Human Research Ethics Committee has established, in accordance with the National Statement on Ethical Conduct in Human Research – Section 5/Processes of Research Governance and Ethical Review, a procedure for expedited review and ratification by a delegated authority of the HREC.

This expedited application was considered by the Chair, HREC and has been approved. The Chair would like to commend the researchers for a detailed and well constructed proposal for low risk research which addresses the National Statement principles.

All ethics approvals are subject to standard conditions of approval. These should be noted by researchers as there is compliance and monitoring advice included in these conditions.

Ms Sue Kelly
HREC Administration
Ph: (02) 6626 9139
E. ethics.lismore@scu.edu.au

Professor Bill Boyd
Chair, HREC
Ph: 02 6620 3569
E. william.boyd@scu.edu.au
The following standard conditions of approval are mandatory for all research projects which have been approved by the HREC or a HRESC and have received an ethics approval number.

All reporting is to be submitted through the Human Research Ethics Office, either at Lismore, Coffs Harbour or GC/Tweed. The email addresses are:
ethics.lismore@scu.edu.au
ethics.coffs@scu.edu.au
ethics.tweed@scu.edu.au

Forms for annual reports, renewals, completions and changes of protocol are available at the website:

**Standard Conditions** in accordance with the National Statement on Ethical Conduct in Human Research (National Statement) (NS).

1. **Monitoring**
   
   NS 5.5.1 – 5.5.10
   
   Responsibility for ensuring that research is reliably monitored lies with the institution under which the research is conducted. Mechanisms for monitoring can include:
   
   (a) reports from researchers;
   
   (b) reports from independent agencies (such as a data and safety monitoring board);
   
   (c) review of adverse event reports;
   
   (d) random inspections of research sites, data, or consent documentation; and
   
   (e) interviews with research participants or other forms of feedback from them.

2. **Approvals**
   
   (a) All ethics approvals are valid for 12 months unless specified otherwise. If research is continuing after 12 months, then the ethics approval MUST be renewed. Complete the Annual Report/Renewal form and send to the ethics office.
   
   (b) NS 5.5.5
   
   The researcher/s will provide a report every 12 months on the progress to date or outcome in the case of completed research including detail about:
   
   Maintenance and security of the records.
   
   Compliance with the approved proposal.
Compliance with any conditions of approval.
Changes of protocol to the research.

3. **Reporting to the HREC**

(c) The researchers will immediately notify the ethics office, on the appropriate form, **any change in protocol**. *NS 5.5.3*

(d) A completion report, on the appropriate form, must be forwarded to the ethics office.

(e) The researchers will immediately **notify the ethics office about any circumstance** that might affect ethical acceptance of the research protocol. *NS 5.5.3*

(f) The researchers will immediately **notify the ethics office about any adverse events/incidences** which have occurred to participants in their research. *NS 5.5.3*

2. **Research conducted overseas**

*NS 4.8.1 – 4.8.21*

Researchers conducting a study in a country other than Australia, need to be aware of any protocols for that country and ensure that they are followed ethically and with appropriate cultural sensitivity.

3. **Participant Complaints**

*NS 5.6.1 – 5.6.7*

**General information**

Institutions may receive complaints about researchers or the conduct of research, or about the conduct of a Human Research Ethics Committee (HREC) or other review body.

Complaints may be made by participants, researchers, staff of institutions, or others. All complaints should be handled promptly and sensitively. All participants in research conducted by Southern Cross University should be advised of the above procedure and be given a copy of the contact details for the Complaints Officer. They should also be aware of the ethics approval number issued by the Human Research Ethics Committee.

The following paragraph is to be included in any plain language statements for participants in research.

*Complaints about the ethical conduct of this research should be addressed in writing to the following:*

**Ethics Complaints Officer**

**HREC**

**Southern Cross University**

**PO Box 157**

**Lismore, NSW, 2480**

**Email:** ethics.lismore@scu.edu.au

All complaints are investigated fully and according to due process under the National Statement on Ethical Conduct in Human Research and this University. Any complaint you make will be treated in confidence and you will be informed of the outcome.
Appendix 3: Institution Consent Form

INSTITUTION CONSENT FORM

Title of research project: **Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia.**

Name of researcher: David McDonald. **Tick the box that applies, sign and date and give to the researcher**

- I agree for Insert College Name to take part in the Southern Cross University research project specified above.  
  - Yes [ ]  
  - No [ ]
- I understand the information about participation in the research project, which has been provided to me by the researcher.  
  - Yes [ ]  
  - No [ ]
- I agree for staff of the institution to be interviewed by the researcher.  
  - Yes [ ]  
  - No [ ]
- I understand that participation by the institution and its staff is voluntary and I understand that I can cease my participation at any time.  
  - Yes [ ]  
  - No [ ]
- I understand that participation in this research will be treated with confidentiality.  
  - Yes [ ]  
  - No [ ]
- I understand that any information that may identify me will be de-identified at the time of analysis of any data.  
  - Yes [ ]  
  - No [ ]
- I understand that no identifying information will be disclosed or published.  
  - Yes [ ]  
  - No [ ]
- I understand that all information gathered in this research will be kept confidentially for 7 years at the University.  
  - Yes [ ]  
  - No [ ]
- I am aware that I can contact the researchers at any time with any queries. Their contact details are provided to me.  
  - Yes [ ]  
  - No [ ]
- I understand that this research project has been approved by the SCU Human Research Ethics Committee.  
  - Yes [ ]  
  - No [ ]

Institutions representative name: ______________________________________________________

Institutions representative signature: ___________________________________________________

- Please tick this box and provide your email or mail address below if you wish to receive a summary of the results:

  Email: ___________________________________________  Date: _________________
Appendix 4: Participant Consent Form

Date

Interviewee name
Institution Name
Address
Suburb and State

Dear

Further to our recent phone conversation, I am writing to request confirmation of your approval for me to include you in a doctoral investigation I am undertaking on the topic of assessment moderation in non self-accrediting institutions in Australia.

The investigation will seek to provide a better understanding of the nature of assessment moderation in non self-accrediting higher education institutions. In undertaking the investigation, I propose to conduct in-depth interviews with at least five selected members of staff at five different non self-accrediting higher education institutions. The participants will include senior academic managers, with responsibilities that relate to the management of assessment moderation at their separate institutions, and members of academic staff from across the five selected institutions. The interviews will require a maximum of 60 minutes, but may well take only 60 minutes. At your institution, I hope to be able to conduct interviews with one senior manager and four other members of academic staff.

In my thesis, you will be identified by a code only, and the identities of all members of staff interviewed will not be made known. All persons agreeing to be interviewed will be assured of anonymity and confidentiality.

Should you have any concerns about the investigation, you will be free at any time to withdraw permission for me to use any data collected from staff members at your institution.

Upon conclusion of the investigation, I will provide you with a brief report of the main findings, and you may also, if you wish, receive an electronic copy of my completed thesis.

I attach an informed consent form for you to complete. I also attach for your information a brief account of the purpose and methodology of my investigation.

I look forward to receiving your signed “Informed Consent”.

Yours sincerely,

David McDonald MBA, MIB
The Consent Form is given to and retained by the Southern Cross University researcher for their records. The Information Sheet is kept by the participant. The participant may request a copy of their consent form.

Title of research project: Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia.

Name of researcher: David McDonald

Tick the box that applies, sign and date and give to the researcher.

I agree to take part in the Southern Cross University research project specified above.

Yes ☐ No ☐

I understand the information about my participation in the research project, which has been provided to me by the researcher.

Yes ☐ No ☐

I agree to be interviewed by the researcher.

Yes ☐ No ☐

I agree to allow the interview to be audio-taped.

Yes ☐ No ☐

I agree to make myself available for further interview if required.

Yes ☐ No ☐

I understand that my participation is voluntary and I understand that I can cease my participation at any time.

Yes ☐ No ☐

I understand that my participation in this research will be treated with confidentiality.

Yes ☐ No ☐

I understand that any information that may identify me will be de-identified at the time of analysis of any data.

Yes ☐ No ☐

I understand that no identifying information will be disclosed or published.

Yes ☐ No ☐

I understand that all information gathered in this research will be kept confidentially for 7 years at the University.

Yes ☐ No ☐

I am aware that I can contact the researchers at any time with any queries. Their contact details are provided to me.

Yes ☐ No ☐

I understand that this research project has been approved by the SCU Human Research Ethics Committee.

Yes ☐ No ☐
Participants name: ____________________________________________

Participants signature: _______________________________________

Date: ______________________

☐ Please tick this box and provide your email or mail address below if you wish to receive a summary of the results:  
Email: ________________________________________________________________

Once signed, please return to David McDonald in the stamped self-addressed envelope enclosed.
Appendix 5: Information for Participants

Information for Participants

National Statement on Ethical Conduct in Human Research (NS)

Name of project: Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia.

Introduction.

My name is David McDonald - I am conducting research as part of my doctoral degree in business at Southern Cross University. My research project is titled: Assessment moderation as a quality management process in non self-accrediting higher education institutions in Australia.

You, executive’s name, have been recommended to me by the Executive of COPHE as the primary contact for your institution.

What is this research?

This research project seeks to understand the phenomena of assessment moderation in NON SELF-ACCREDITING INSTITUTIONs. That is, to understand the actions, motivations, behaviours and attitudes that influence implementation of assessment moderation; it does not seek to evaluate the quality of the process nor its outcomes.

The research sample will include five NON SELF-ACCREDITING INSTITUTIONs that have completed one AUQA or TEQSA audit. These institutions and participants have the knowledge, experience and capacity to provide descriptive data about the phenomenon.

What does this research involve?

In order to understand the phenomena, the project will use qualitative research. The methodology will use semi structured individual interviews of five nominated staff (one academic director/manager and four academic staff). To guide the interview, I will be using a prepared set of questions. The interview is scheduled to last for approximately 45 to 60 minutes duration.

The interviews will provide detailed descriptions, commentary and insights into the implementation of the assessment moderation process. The data collected from each participant will be transcribed for their review and amendment.
My responsibilities to my participants.

My responsibility is to ensure each participant understands participation in the research is voluntary, all information and findings are non-identifiable and the associated risks. The participant may withdraw at any time and there is no need to provide an explanation or reason.

Prior to the commencement of the interview, the participant will be supplied with sufficient information to provide adequate understanding of the research process and the potential implications from the findings. Following the introductory telephone conversation, which has overviewed the research project, they will be provided with this information sheet and a general discussion and conversation prior to the interview. These activities will assist in developing rapport with the participant and address any questions, issues or concerns prior to the formalising consent and participating in the interview.

The participant will understand participation is voluntary and they may withdraw from the process at any time without consequence or action.

All participant identities will be coded at the commencement of the interview. All data collected will be identified with the participants code only so as to permanently remove, the identity of the participant and the institution. Similarly each institution will be provided with a code to remove its identity. The only data relationship is the collective data for an institution which will be non-identifiable.

The research findings will contribute to the current knowledge of assessment moderation in HE. More specifically, it will assist in furthering the knowledge on the phenomena and the role of staff.

There will be no payments or incentives offered to the participants. The interviews will take place at a time convenient within their schedule and will occur at their place of employment/institution.

Your participants’ responsibilities for this research.

Through the initial telephone discussion and conversation prior to the interview, the participant will understand participation is voluntary and they may withdraw from the process at any time without consequence or action.

The interviews will occur at the participant’s place of work at a time convenient to their schedule. The participant will need to allocate between 45 and 60 minutes to complete the interview. The participant is not required to prepare any materials or notes prior to the interview. The researcher will use a set of semi structured questions that seeks to explore their “knowledge, experience, understanding and participation” in the assessment moderation process. The participant will not be required to rank, rate or critique the institution’s assessment moderation process.
The participant will be asked to complete member checking as a method to verify the accuracy of the data collected and amend any errors. At this stage the data will remain as non-identifiable as it will have been coded to remove permanently the identity of the participant and the institution. There will be no labels for association of the data or the report with the participant or institution. The only linkage will be the collective case data for an institution which again will be non-identifiable.

The likelihood and form of dissemination of the research results, including publication.

“The results of this study may be published in a peer-reviewed journal and presented at conferences, but only non-identifiable group data will be reported”.

The non-identifiable data will be stored as electronic files in a locked filing cabinet of the researcher for seven years. Similarly, an electronic copy of all data will be held by the researcher’s supervisor at Southern Cross University for seven years.

**Participant’s Consent.**

The participant will be required to read, acknowledge and sign a consent form. This will be completed at the meeting and prior to commencing the interview. The participant and researcher will hold copies of the consent form.

**Inquiries.**

My research is being conducted under the supervision of Professor Martin Hayden, at the School of Education, SCU. If you would like to discuss any aspect of my research with Martin, his email address is martin.hayden@scu.edu.au and his mobile phone number is 0408 624 170.

Primary contact details for the research are:
- Researcher: David McDonald  
  Email: d.mcdonald.20@scu.edu.au  
  Telephone: 02 – 9999-3240
- Supervisor: Professor Martin Hayden  
  Position: Head of School - Education  
  Email: martin.hayden@scu.edu.au  
  Telephone: 0408 624 170

Southern Cross University Ethics Committee  
PO Box 157  
Lismore  NSW  2480  
Email: ethics.lismore@scu.edu.au

Feedback.
The participants will be provided with
A copy a non-identifiable transcript from the interview for member checking
Offer of electronic copy of the consolidated findings using non-identifiable data – this may
be requested at the time of participation, via the consent form, or during the follow-up
contact of member checking and ongoing discussions
Offer of electronic copy of the final thesis completed using non-identifiable data

Has this research been approved by Southern Cross University? (include the following
statement)

*This research has been approved by the Human Research Ethics Committee at Southern
Cross University.*

**The approval number is ECN-12-168**

Complaints about the research/researchers

If you have concerns about the **ethical conduct** of this research or the researchers, the
following procedure should occur.

Write to the following:

The Ethics Complaints Officer
Southern Cross University
PO Box 157
Lismore  NSW  2480
Email: ethics.lismore@scu.edu.au

All information is confidential and will be handled as soon as possible.
Appendix 6: Interview Schedule

1. To start, please tell me about the nature of your role and responsibilities at this institution. What responsibilities do you have regarding the delivery of an academic program or units/subject of study?

2. TEQSA is the new accrediting body for the Australian HE sector. Within their registration system, institutions will be assessed on five categories:
   a. Provider Standards (consisting of the Provider Registration Standards, Provider Category Standards and Provider Course Accreditation Standards); b. Qualification Standards; c. Teaching and Learning Standards; d. Research Standards and e. Information Standards

   Question 2 continued:

   Referring specifically to teaching and learning standards what do you think are the components of quality teaching and learning?

   (If the respondent names more than five, she/he was then asked: What would you name as being the top five components in order of priority?)

3. What role and responsibilities does your position have for student assessments (development, evaluation, review)? Do any of these involve the need to moderate student assessment practices and outcomes?

4. For your position could you explain in detail, the assessment moderation practices you engage in directly?

   (And if the participant was a manager or executive: What assessment moderation practices do you require any of your members of staff to engage in directly?)

5. What are the assessment moderation processes that your institution practises on an ongoing basis?

6. If you were to explain to a friend, what is your understanding of ‘assessment moderation’? (with supporting questions where the participant provided a limited response)

   a. What do you think assessment moderation should involve?

   b. Is assessment moderation important to do? If so, why?
7. What role and responsibilities do individual lecturers in your institution have for the implementation of assessment moderation?

a. How is any accountability in this regard communicated to them?

b. Is there ever any check on their performance of these responsibilities? If so, how does this happen?

8. The delivery of an academic program is an integrative process – i.e. staff, units of learning, lecturers, accreditation assessments etc.

a. Where is or should the responsibility for assessment moderation be allocated and why?

b. There is a high interdependence between staff in academic programs: could there be a relationship between teaching, assessment quality and moderation interrelated to the team/corporate culture – if yes why, if no why?

c. With a large number or reliance upon casual/sessional staff – does this influence the implementation of assessment moderation?

d. How would staff engagement influence assessment moderation processes and implementation of quality T&L?

9. Does your institution have a formal policy and procedure for assessment moderation? If ‘yes’, why, and if ‘no’, why not?

Has your institution ever delivered training and development on assessment moderation?

10. Have you ever been made accountable within your institution for the implementation of assessment moderation, and, if so, how has this accountability been communicated to you?

11. Do you have any experience of assessment moderation practices at other higher education institutions? If so, what has been your experience?

12. Have you read much about assessment moderation in higher education, or have you come across any interesting documents, including policies and procedures, about the topic?
13. Regarding my investigation of assessment moderation in non-self-accrediting higher education institutions in Australia, do you have any additional advice or concerns to share with me?

And:

14. Is there anything I have not covered in this interview that you think should be addressed because of its relevance?