

AUSTRALIAN UNIVERSITIES QUALITY AGENCY

Report of an Audit of the
Australian College of Applied Psychology

February 2008

AUQA Audit Report Number 57

ISBN 978 1 877090 81 3

© Australian Universities Quality Agency 2008

Level 10, 123 Lonsdale Street
Melbourne, VIC 3000
Ph 03 9664 1000
Fax 03 9639 7377

admin@auqa.edu.au

<http://www.auqa.edu.au>

The Australian Universities Quality Agency receives funding from the Australian Government and State and Territory Governments of Australia.

The views expressed in this report do not necessarily reflect the views of the Australian Government.

CONTENTS

OVERVIEW OF THE AUDIT	1
Background	1
The Audit Process	1
CONCLUSIONS.....	3
Introduction to Findings.....	3
Commendations.....	4
Affirmations	4
Recommendations	5
1 INSTITUTIONAL AND EDUCATIONAL OBJECTIVES AND INSTITUTIONAL GOVERNANCE.....	6
1.1 Educational Objectives	6
1.2 Business Model and Future Plans	7
1.3 Strategic Planning	8
1.4 Institutional Governance	9
2 ACHIEVING EFFECTIVENESS IN TEACHING, LEARNING AND OTHER CORE FUNCTIONS	10
2.1 Academic Quality Assurance and Scholarly Leadership	10
2.2 Curriculum, Delivery and Assessment.....	10
2.2.1 Curriculum Development	10
2.2.2 Assessment	11
2.2.3 Academic Integrity	12
2.3 Delivery of Modules and Programs	12
2.3.1 On-campus Delivery.....	12
2.3.2 Flexible Delivery	13
2.3.3 Fieldwork, Practicum and Psychology Registration.....	13
2.4 Student Admission, Progress and Feedback	14
2.4.1 Student Admission and Progress	14
2.4.2 Student and Graduate Feedback and Grievance Procedures	14
2.5 Licensee Operations.....	15
3 ORGANISATIONAL STRUCTURES, DECISION-MAKING PROCESSES AND RESOURCES TO SUPPORT TEACHING AND LEARNING AND OTHER CORE ACTIVITIES	17
3.1 Organisational Structures and Decision Making.....	17
3.2 Human Resources Development.....	17
3.2.1 Staff Development and Workforce Planning.....	17
3.2.2 Support for and Retention of Educators	18
3.3 Support for Students.....	18
3.4 Infrastructure and Resources.....	19
3.4.1 Financial and Physical Resources.....	19
3.4.2 Information Technology and Systems.....	19
3.4.3 Library Resources.....	20

4	MAINTAINING A COMMITMENT TO QUALITY IMPROVEMENT	21
4.1	Development of a Culture for Systematic Improvement.....	21
4.2	Good Practice and Benchmarking.....	21
	APPENDIX A: AUSTRALIAN COLLEGE OF APPLIED PSYCHOLOGY.....	23
	APPENDIX B: AUQA’S MISSION, OBJECTIVES, VISION AND VALUES *.....	24
	APPENDIX C: THE AUDIT PANEL	26
	APPENDIX D: ABBREVIATIONS AND DEFINITIONS.....	27

OVERVIEW OF THE AUDIT

Background

In 2003 the Australian Government introduced the Higher Education Support Act 2003 (HESA) to allow students in non self-accrediting higher education institutions to receive financial assistance for their students' tuition fees through the FEE-HELP program.

Non self-accrediting institutions (NSAIs) approved under the HESA for this purpose have become known as higher education providers, or HEPs¹. The HESA requires that HEPs in receipt of FEE-HELP funds must meet a range of quality and accountability requirements, including regular audit by a quality auditing body named in the Higher Education Provider Guidelines.

This Report of the audit by the Australian Universities Quality Agency (AUQA) of the Australian College of Applied Psychology ('ACAP' or 'the College') provides an overview, and then briefly details the Audit Panel's main findings, and its commendations, affirmations and recommendations. A brief introduction to the Australian College of Applied Psychology is given in Appendix A; the mission, objectives, vision and values of AUQA are shown in Appendix B; and membership of the Audit Panel is provided in Appendix C. Appendix D defines abbreviations and technical terms used in this Report.

The Audit Process

AUQA bases its audits of non self-accrediting HEPs on each organisation's own objectives, together with the MCEETYA *National Protocols for Higher Education Approval Processes* (National Protocols, available at: <http://www.mceetya.edu.au/mceetya/>), the DEST (now DEEWR) Handbook for Pilot Quality Audits of Higher Education Providers (or subsequent revisions) and other relevant legal requirements or codes to which the organisation is committed. The programs or courses of NSAIs are accredited by state and territory accrediting agencies, so quality audits of HEPs do not include a detailed examination of the academic quality assurance processes for programs of study.

HEP audits under the HESA conducted by AUQA are structured around consideration of institutional performance assessed against the institution's objectives and these are also checked against criteria that are set out in a set of four 'Quality Audit Factors' (QAFs), currently set out in the handbook referred to above. The primary purpose of the QAFs is to provide the HEPs with a framework for the review of certain aspects of institutional performance. The Australian College of Applied Psychology structured its 'Performance Portfolio: Self-Review Report' (henceforth 'Portfolio') following the QAFs, and this Report also follows the main topic headings provided by the QAFs, addressing the criteria for all QAFs although not necessarily in the same order as they appear in the Portfolio.

On 31 August 2007, ACAP presented its submission to AUQA, comprising a 77 page account of its self-review and 93 Supporting Materials. The Audit Panel met in Melbourne on 28 September 2007 to consider these materials.

The AUQA Audit Director on the Panel undertook a Preparatory Visit to ACAP on 12 October 2007. During that visit, a series of questions for clarification and requested additional documents were discussed. The shape of the Audit Visit program was also developed.

¹ Although universities and a small number of other self-accrediting institutions are also 'higher education providers', the term 'HEP' is to be understood in this Report as applying only to non self-accrediting higher education providers.

The main Audit Visit took place over four days. On 16 November 2007, one Panel member visited ACAP's Melbourne Campus. On 19 November, the Panel Chair visited ACAP's Brisbane Campus. The full Panel visited ACAP's Sydney Campus on 21 and 22 November 2007. The Sydney visit included two videoconference sessions with one of ACAP's licensees, the Coleman School of Behavioural Sciences in Singapore.

In all, the Audit Panel spoke with approximately 130 people during these audit visits, including: key senior staff and managers from ACAP; the contracted professionals ('Educators') who teach on ACAP programs; a cross-section of undergraduate and postgraduate students; and a sample of external stakeholders. Sessions were also available for any member of the ACAP community to meet the Audit Panel but no one took advantage of this opportunity.

This Report relates to the situation current at the time of the Audit Visit, which ended on 22 November 2007 and does not take account of any changes that may have occurred subsequently. It records the conclusions reached by the Audit Panel based on the documentation provided by ACAP as well as information gained through interviews, discussion and observation. While every attempt has been made to reach a comprehensive understanding of ACAP's activities encompassed by the audit, the Report does not identify every aspect of quality assurance and its effectiveness or shortcomings.

The Report contains a summary of audit findings together with lists of commendations, affirmations and recommendations. A commendation refers to the achievement of a stated goal, or to some plan or activity that has led to, or appears likely to lead to, the achievement of a stated goal, and which in AUQA's view is particularly significant. A recommendation refers to an area in need of attention, whether in respect of approach, deployment or results, which in AUQA's view is particularly significant. Where such matters have already been identified by ACAP, with evidence, they are termed 'affirmations'. AUQA indicates that some recommendations and affirmations have a high priority. It is acknowledged that recommendations in this Audit Report may have resource implications.

Quotations taken from the Portfolio are identified as (PF p) and from Supporting Material as (SM).

CONCLUSIONS

This section summarises the main findings and lists the commendations, affirmations and recommendations. Other favourable comments and suggestions are mentioned throughout the text of the Report.

Introduction to Findings

Considering ACAP's institutional and educational objectives, AUQA commends the College on its success in establishing courses that are attractive to students, have many positive elements including small class sizes, and that address a significant need for teaching in the practice of counselling. ACAP staff have been active in the professionalisation of counselling and ACAP has developed a strong reputation in its chosen fields.

ACAP has plans for further growth and diversification and AUQA recommends that the College examine the educational and cultural changes that will need to occur, as simply expanding its current model of operations is unlikely to provide suitable academic leadership and quality assurance processes.

In relation to institutional governance, AUQA notes positively ACAP's establishment of formal relationships with advisory organisations and the steps it has taken to bring external academic advice onto its Academic Council. However, AUQA considers that the membership of ACAP's governing body, the College Council, should be broadened to include persons independent of ACAP and its parent company who are able to provide additional and impartial advice. AUQA also recommends that ACAP include educational as well as business objectives in its strategic plan and make use of key performance indicators for its educational objectives.

With respect to teaching and learning, and other core functions, AUQA finds that ACAP needs to strengthen its internal academic expertise, a matter that the College has begun to recognise. AUQA commends ACAP for the positive learning experiences of its on-campus students, while affirming ACAP's intention to provide better support for students undertaking modules by flexible delivery. ACAP is commended for thoroughly documenting its curriculum and for participating in the Graduate Destination Survey, but AUQA urges ACAP to pursue a range of other improvements to academic quality assurance. These improvements, which ACAP has identified, include the implementation of a 'fail' grade, a comprehensive program of moderation, and the phasing out of composite classes of students taking vocational education and training (VET) and higher education courses. While ACAP's arrangements with offshore licensees have recognised the need for regular quality assurance reviews, AUQA is not convinced that they provide ACAP with sufficient control over its courses and recommends that ACAP review these arrangements.

As far as organisational structures, decision-making processes, and resources to support core activities are concerned, AUQA affirms the College's recognition of the need for additional professional development for staff. ACAP is commended for the induction it provides to its contracted Educators but is advised to consider additional means of enabling Educators to contribute to the academic life of the College and to benchmark the level of rewards it provides. Similarly, ACAP is commended for providing counselling support to meet a significant level of need among students, but also advised to review its practices and the adequacy of its resourcing to minimise risk.

AUQA affirms ACAP's plans to undertake more analysis of student outcome data and to improve the use it makes of student feedback information, two matters that relate to ACAP's current and future approach to quality improvement. Overall, AUQA finds that ACAP has been willing to consider improvements as they are proposed, but has lacked systematic means to identify and prioritise several major elements of academic quality assurance, including the use of data on student retention, progress and academic performance. AUQA affirms ACAP's desire to strengthen its 'culture of evidence' and, in support of this,

recommends as matters of urgency that ACAP develop a set of standard reports and that the College implement processes to compare and benchmark its academic and operational processes and outcomes with relevant institutions.

A summary of commendations, affirmations, and recommendations follows. They are listed below in the order in which they appear in the Report.

Commendations

1. AUQA commends ACAP for having identified an educational market that is attractive to students and that addresses a significant community need for teaching in the practice of counselling.7
2. AUQA commends ACAP for the good reputation it has established in the field of practice-based counselling, noting that the College has acknowledged a need to collect additional data to validate the informal feedback it already receives.7
3. AUQA commends ACAP for the thorough documentation of its curriculum.11
4. AUQA commends ACAP for the positive learning experiences of its on-campus students and for its commitment to small class sizes.12
5. AUQA commends ACAP for its initiative in participating in the Graduate Destination Survey, which will provide the College with useful comparative information on graduate outcomes.15
6. AUQA commends ACAP for its induction of Educators, including its Educator Handbook.18
7. AUQA commends ACAP for recognising the need to provide academic and counselling support to meet a significant level of need among its students.19

Affirmations

1. AUQA affirms ACAP's actions in establishing formal relationships with relevant advisory organisations and individuals through its Academic Council and Academic Advisory Committees.9
2. [High Priority] AUQA affirms ACAP's appointment of a head of school to strengthen its ability to provide internal academic quality assurance and urges ACAP to consider making additional continuing or long term contract academic appointments.10
3. AUQA affirms ACAP's implementation of a 'fail' grade to more clearly indicate where students have not met academic requirements of a module.11
4. AUQA affirms ACAP's implementation of a pilot program of external moderation of assessment from 2008 and encourages ACAP to consider implementation of moderation more widely once the pilot program has been completed.12
5. [High Priority] AUQA affirms ACAP's phasing out of composite classes of VET and higher education students and encourages ACAP to provide separate classes for higher education students taking undergraduate and postgraduate programs respectively.13
6. AUQA affirms ACAP's intention to improve support for students taking modules by flexible delivery and encourages ACAP to consider how to structure its flexible delivery to better reflect its distinctive approach to learning.13

7. AUQA affirms ACAP's plans to undertake greater analysis of student outcome data across the whole College, especially in relation to progression, retention, attrition and academic performance.14
8. AUQA affirms ACAP's intention to better collate and analyse its student feedback, noting that the analysis should focus on identifying themes and systemic improvements and that ACAP should report back to students on the improvements that have been implemented.....15
9. AUQA affirms ACAP's recognition of the need for additional professional development for staff and encourages the College to ensure that its workforce planning considers its future needs for academic as well as administrative skills.17
10. AUQA affirms ACAP's intention to encourage the development of a 'culture of evidence' throughout the organisation and ensure the integration of quality improvements within strategic and operational planning.21

Recommendations

1. [High Priority] AUQA recommends that ACAP examine the educational and cultural as well as the financial requirements of its plans for growth and diversification, with particular consideration of the need for stronger academic leadership.8
2. AUQA recommends that ACAP include educational as well as business objectives in future iterations of its strategic plan, give consideration to the use of a set of key performance indicators for educational outcomes, and improve the alignment of plans with its mission.....8
3. AUQA recommends that ACAP consider broadening the membership of the College Council to include persons independent of ACAP and Navitas Ltd who are able to provide impartial informed advice.....9
4. AUQA recommends that ACAP assess whether its current arrangements with licensees provide an adequate level of control for it to be assured of the equivalence of the offshore program with onshore on-campus programs, including the standard and nature of teaching and assessment practices and the accuracy of marketing material.....16
5. AUQA recommends that ACAP consider additional means of enabling Educators to contribute to the academic life of the College and benchmark the level of rewards it provides for Educators.18
6. [High Priority] AUQA recommends that, given the sensitive personal nature of the issues explored by students, ACAP review its practices and the adequacy of resourcing for student support, to assure itself that it has minimised the risks to students and others and is meeting its duty of care.....19
7. [High Priority] AUQA recommends that ACAP develop as a matter of urgency a set of standard reports on student information and outcomes, and on consolidated student feedback, to assist managers and committees to readily assess how ACAP is performing on key measures of educational performance and identify areas for improvement.....20
8. [High Priority] AUQA recommends that ACAP implement processes to compare and benchmark its academic and operational processes and outcomes with relevant institutions, in order to implement good practice and thus assure itself that its programs and operations are of a high standard.22

1 INSTITUTIONAL AND EDUCATIONAL OBJECTIVES AND INSTITUTIONAL GOVERNANCE

ACAP's vision is to be '*an innovative centre of excellence for education in applied psychology and to inspire students to contribute to the community through a culture of integrity, equity and social justice*' (PF p1).

The College's mission states that ACAP aims to:

- *Serve the community through graduating students with high standards of professionalism and ethics.*
- *Foster an organisational environment that supports the personal and professional development of staff, students and associates of the College.*
- *Continue to evolve through pioneering new ideas and in response to community need.*
- *Promote the College's educational model to empower people through learning.*
- *Promote the College's courses to corporate and government clients.*
- *Develop our capacity to undertake research and social inquiry in the area of applied psychology.* (PF p1)

The College prides itself on its distinctive approach, which centres on 'experiential learning', preparation for professional practice, small class sizes, flexible delivery and a supportive environment. Its educational philosophy was developed by its founder and continues to be reflected in ACAP's current programs. Students are typically young to middle-aged adults who are returning to study and most are women, although this profile may change in future.

Over 25 years, ACAP has defined its role in the Australian higher education sector. It has succeeded in finding a unique market niche but with this come some unique issues to manage and some challenges as the College expands further. A profile of ACAP is at Appendix A.

1.1 *Educational Objectives*

ACAP's educational objectives are implicit in its educational philosophy which consistently articulates a concern for students as learners and celebrates self-discovery through practice, usually expressed as an approach based on 'adult experiential learning'. The 2007 Teaching and Learning Plan expresses this approach through the following philosophical principles:

1. Build a community of learning
2. Let diversity thrive
3. Foster personal development
4. Be practical
5. Employ practising Educators
6. Provide accessible pathways.

ACAP has created a strong culture around its core principles and ACAP staff, Educators and on-campus students have embraced them enthusiastically. Many new students are recruited to ACAP through word of mouth or through the internet. ACAP accurately reflects its educational principles and approach on its website and in its marketing material for students studying in Australia (see section 2.5 regarding licensee programs). Similarly, ACAP provides clear information on fees and students' financial obligations.

In preparing students to be counsellors and otherwise manage sensitive human interactions, ACAP is contributing to the professionalisation of the welfare fields, and the area of counselling in particular. At present, there are no government requirements for regulation of the counselling profession. ACAP's founder and other leaders have actively contributed to self-regulation of an emerging profession of counselling through their involvement in the Psychotherapy and Counselling Federation of Australia (PACFA) and the Society of Counselling and Psychotherapy Educators, Australia (SCAPE), and through their emphasis on professional standards in the College's programs.

Commendation 1

AUQA commends ACAP for having identified an educational market that is attractive to students and that addresses a significant community need for teaching in the practice of counselling.

As a result of its involvement in PACFA and SCAPE, its use of Educators who are practitioners and its extensive use of fieldwork and practicum placements, ACAP is well-known in its practitioner communities and has an extensive network of contacts. From the audit interviews and other information available to the Panel, ACAP enjoys a good reputation among employers and the counselling profession. A recurring theme throughout this Report, acknowledged by ACAP, is a need for the College to better gauge the extent to which it is succeeding in living up to its philosophy and meeting its claims of producing graduates who are 'practice-ready'.

Commendation 2

AUQA commends ACAP for the good reputation it has established in the field of practice-based counselling, noting that the College has acknowledged a need to collect additional data to validate the informal feedback it already receives.

1.2 Business Model and Future Plans

ACAP Pty Ltd is a wholly-owned subsidiary of Navitas Ltd (see Appendix A). The ACAP business model relies on sound planning and coordination, standardised curriculum materials and Educators who are contracted by the College, as service providers rather than employees, to teach the modules. This model allows ACAP to maintain its commitment to small class sizes for face-to-face teaching while enabling it to return a profit to its owners.

ACAP aims to expand in size and scope more or less continuously over the next five to ten years. A new campus will open in Adelaide in 2008 and further increases in student numbers are projected. ACAP is considering whether to offer a Bachelor of Psychology degree, a program that it does not currently provide, and plans to develop the College's research capacity. ACAP had profiled its current students and now plans to market its programs more to under-25s. It is also likely in future to market more to international students, as part of the Navitas group, which includes large providers of English-language programs. As well, the College intends to seek self-accrediting status for some programs in a few years' time.

ACAP sits within the 'workforce' division of Navitas and the Audit Panel was informed that this is because of its significance in providing graduates for the health and community services sector. The College has also identified opportunities for targeting the corporate sector in respect of its modules and programs in aspects of organisational psychology, people management and leadership, consistent with the College's mission statement. ACAP now faces the challenges associated with growth and diversification, which require consideration of the scalability of its operations and the impact on its distinctive teaching model. ACAP staff and Educators are aware of the potential for uncertainty and cultural change as ACAP seeks to manage the transition to a larger scale of operation.

ACAP's Educators form the core of its current academic capability, as most of its ongoing full-time and part-time staff perform roles that are more administrative than academic. As ACAP increases its operations and pursues new directions, the College must strengthen and expand its in-house academic leadership and, through this, the engagement of students with scholarship in the field. While ACAP acknowledges a need for greater academic leadership, the implications for ACAP's cost structure and for its internal culture have yet to be fully worked through. ACAP is urged to explore with some urgency the educational and cultural changes that will need to occur, as simply expanding its current model of operations is unlikely to provide academic leadership and quality assurance processes suitable to its future plans.

Recommendation 1

[High Priority] AUQA recommends that ACAP examine the educational and cultural as well as the financial requirements of its plans for growth and diversification, with particular consideration of the need for stronger academic leadership.

1.3 Strategic Planning

The Panel saw evidence that the vision and mission statement have been reviewed by the College Executive. It notes that the themes of equity and social justice are not obvious in ACAP's current marketing material, which emphasises that graduates are 'practice-ready'.

ACAP has a Strategic Business Plan (05–09), a draft Teaching and Learning Plan 2007 and a set of 2007 Strategic and Operational Plans for key areas. The Strategic Business Plan, which includes a frank SWOT analysis and analyses of the student profile and competitors, was developed by the College's Directors, with the involvement of staff through an annual strategic planning workshop to discuss overall directions. The Plan sets out priorities by year and thus provides a clear roadmap for business development.

As the Strategic and Operational Plans are essentially workplans for senior managers, ACAP managers are well-informed about priorities. Managers and senior staff are able to have input to the development of plans and there is plenty of discussion of operational and implementation issues. However, there needs to be more robust and continuous discussion of more fundamental matters of academic standards and the relationships between practice-based and theoretical learning and research.

A weakness in ACAP's current strategic planning process is that priorities for development are not explicitly linked to achievement of the mission or to any educational objectives or targets. ACAP needs to be clearer about the levels of academic performance and student and graduate satisfaction it wishes to achieve, as these will affect its sustainability as an organisation. Future iterations of ACAP's strategic plans should include key performance indicators in respect of academic performance and student satisfaction, while consistency in planning would be strengthened by closer alignment between the various plans, linked back to ACAP's mission.

Recommendation 2

AUQA recommends that ACAP include educational as well as business objectives in future iterations of its strategic plan, give consideration to the use of a set of key performance indicators for educational outcomes, and improve the alignment of plans with its mission.

1.4 Institutional Governance

ACAP's governing body, the College Council, has four members: ACAP's Managing Director and Director of Academic Development; the Executive General Manager of the Navitas Workforce Division (to whom ACAP's Managing Director reports) and the General Manager Macquarie Operations, which is another ACAP company. The Executive Committee comprises members of ACAP's senior management team and is chaired by ACAP's Managing Director.

While the Panel heard that the distinction between governance and management is well understood by College Council members, it observes that the Council has no member who can provide advice that is genuinely independent of Navitas. ACAP has not reviewed the extent to which the Council is performing effectively. While ACAP has increased its Council size by adding a fourth member, it has not articulated the mix of skills and experience that it requires and the current composition may not provide the necessary counterbalance to management. The Panel formed the view that ACAP should consider some further broadening of Council membership, consistent with ACAP's aim of improving external representation.

Recommendation 3

AUQA recommends that ACAP consider broadening the membership of the College Council to include persons independent of ACAP and Navitas Ltd who are able to provide impartial informed advice.

ACAP has a large number of governance and management committees, chief among which is the Academic Council, to which it has delegated responsibility for approval of programs being submitted for accreditation. The Chair of the Academic Council is external to ACAP, as are four of its twelve members. The significant role of the Chair and other external members, while valuable in bringing a comparative perspective on academic standards, presents a risk of ACAP's being overly dependent on external judgements of academic quality. As noted above, this could present difficulties for ACAP's future development as an educational institution.

At its current stage of development, however, ACAP appears likely to benefit from these sources of external advice on academic matters. The Chair of the Academic Council is also head of ACAP's Quality Committee, and will attend College Council meetings in future, with the aim of ensuring that the governing body becomes well-informed about academic and quality assurance matters. There are active Academic Advisory Committees for both the Brisbane and Melbourne campuses and these, together with the Academic Council and Course Advisory Committees, appear to be meeting ACAP's aims of maximising academic and industry-specific advice through committees.

Affirmation 1

AUQA affirms ACAP's actions in establishing formal relationships with relevant advisory organisations and individuals through its Academic Council and Academic Advisory Committees.

2 ACHIEVING EFFECTIVENESS IN TEACHING, LEARNING AND OTHER CORE FUNCTIONS

ACAP offers programs at certificate, diploma, undergraduate and postgraduate degree level, including a new masters program. Credits for an award are accrued by students taking a series of individual course modules which are offered face to face on campus and also through online or through traditional distance education. Some modules may also be taken as intensive weekend workshops. The College has articulation agreements with a number of Australian universities for entry into coursework masters programs and is seeking to expand these.

As of August 2007, ACAP reports that 57% of students are taking modules by on-campus study, 30% are undertaking studies by distance education and 13% are studying online.

2.1 *Academic Quality Assurance and Scholarly Leadership*

The Academic Council is informed by an internal Teaching and Learning Committee, to which ACAP's Curriculum and Assessment Review Committee reports. As noted in section 1, ACAP recognises a need to expand its in-house academic leadership, for example in ensuring that students are engaging with relevant literature and theoretical concepts as well as with practice.

It was not clear to the Panel that all ACAP managers or Educators recognise theoretical academic knowledge as existing in dynamic tension with practice. Students need to be able to ensure their practice is informed by theoretical debate and in turn is able to inform such debates, to help both theory and practice move forward. In this regard, ACAP has an opportunity to better define for students, Educators and staff what is understood by 'experiential learning'.

External academic advisors confer legitimacy and provide valuable advice, but to ensure robust quality assurance (and in pursuit of self-accrediting status) ACAP will need to institutionalise this capacity. For example, ACAP should strengthen the ability of its committees to provide authoritative advice to the Academic Council on the extent to which modules are integrated to form a coherent award program and assessment tasks examine both academic and practice-based learning.

Through the recent appointment of a part-time head of school, ACAP has signalled the need for a stronger internal capacity to review the extent to which it is maintaining an appropriate academic relationship between theory and practice in curriculum, teaching and assessment. In the view of the Audit Panel, additional academic appointments will be required and AUQA urges ACAP to continue to strengthen its capacity for continuous academic review.

Affirmation 2

[High Priority] AUQA affirms ACAP's appointment of a head of school to strengthen its ability to provide internal academic quality assurance and urges ACAP to consider making additional continuing or long term contract academic appointments.

2.2 *Curriculum, Delivery and Assessment*

2.2.1 Curriculum Development

ACAP centralises its curriculum development, for consistency and efficiency. Modules are 'refreshed' every three years or updated more frequently as required, for example, to reflect new

regulatory requirements. ACAP's Course Development Group receives suggestions for changes from Educators, contracts writers to update the text and sends the revised modules for an external review. The advantages of this system are that ACAP's curricula are fully documented in plain language and that any ACAP module will have the same content, whatever its mode and location of delivery. The Panel notes that distance education students and online students receive a complete copy of module documentation. On-campus students receive an abridged version, as ACAP considers these students have the benefit of full access to Educators and class interaction. However, the Panel heard that on-campus students would like access to the complete module documentation and suggests ACAP consider revising its views on this.

Commendation 3

AUQA commends ACAP for the thorough documentation of its curriculum.

The drawbacks of this approach are a lack of oversight at the planning stage of the extent to which a group of modules form a coherent sequence leading to an award, and the fact that modules are written in the same way regardless of the awards for which students are enrolled. The Audit Panel heard some criticism from Educators over the quality of the modules. Some Educators supplement the curriculum with their own presentations, which may well be valuable but highlights the potential for disconnection between the curriculum and what is taught, with attendant risks to quality assurance. Additional in-house academic expertise should assist in addressing these issues. ACAP is encouraged to consider also whether the ending of composite classes (section 2.3.1) might also lead to some differentiation within the modularised curriculum.

The College intends to align its undergraduate counselling courses to the revised PACFA training standards in 2008, to accredit the counselling streams of its courses with PACFA and explore the possibility of accrediting the management streams of its courses with an appropriate professional body such as the Australian Human Resources Institute (AHRI). As well, ACAP has identified a need for more extensive feedback from industry regarding professional standards. The Audit Panel observes that the views of some key informants and fieldwork supervisors may provide this input in a relatively inexpensive fashion, while acknowledging ACAP's desire to collect formal quantitative feedback from stakeholders.

2.2.2 Assessment

Responsibility for the development of assessment tasks is shared among several College committees, with responsibility for final review and endorsement resting with the Curriculum and Assessment Review Committee. The Panel was not convinced, however, that ACAP's Curriculum and Assessment Review Committee is able to fully consider the extent to which assessment tasks for all modules allow students to demonstrate an appropriate level of theoretical as well as practical understanding.

Educators mark the modules they teach, using an ACAP marking guide, with the overall grade distribution being reviewed in the first instance by ACAP's program coordinators and then by the Results Review Committee and Academic Council. Students who did not achieve a pass on an ACAP module were previously marked as 'incomplete' but ACAP is now implementing a grade of 'fail'.

Affirmation 3

AUQA affirms ACAP's implementation of a 'fail' grade to more clearly indicate where students have not met academic requirements of a module.

ACAP has begun to recognise the desirability of moderation of assessment, to satisfy itself that students are being assessed consistently within and among modules and programs. In 2006, a small moderation exercise was conducted for ACAP by a staff member at the University of New

England. This exercise revealed some inconsistencies. As a result, ACAP has committed to implement a pilot program of external moderation from 2008. AUQA encourages ACAP to introduce moderation more generally, learning from the results of this pilot program.

Affirmation 4

AUQA affirms ACAP's implementation of a pilot program of external moderation of assessment from 2008 and encourages ACAP to consider implementation of moderation more widely once the pilot program has been completed.

A Results Review Committee, with external members, has been established recently to analyse student results prior to their release to the Academic Council. It is not yet clear whether this committee is expected to oversee the moderation process or whether it is to undertake the data analysis. In either case, ACAP may wish to reconsider the role it expects this Committee to play.

2.2.3 Academic Integrity

ACAP's staff and Educators have recognised that plagiarism, whether unintentional or intentional, is an issue that needs to be addressed for academic quality assurance. The College has a policy and procedure for handling instances of plagiarism and educates its students on avoidance of plagiarism through its Student Handbook, Study Skills Handbook and workshops. ACAP intends to implement the plagiarism detection software Turnitin over the next 12 months and the Panel was informed that ACAP intends to use the software for educative purposes as well as for checking. AUQA suggests ACAP staff could benefit from discussions with other institutions on the most appropriate ways to implement the software to ensure that students understand the positive aspects of acknowledging the work of others and relevant schools of thought.

2.3 *Delivery of Modules and Programs*

2.3.1 On-campus Delivery

In its on-campus delivery, ACAP keeps to a maximum class size of 18 to ensure a high degree of student participation and active learning. Modules are offered when there is sufficient demand, or when enough students need to take a module to progress their program of study. Although this may mean that some classes may be so small as to make effective interaction rather difficult, students are extremely positive about the small classes offered by ACAP and appreciate the learning opportunities this provides. On-campus students are reflexively aware that they are learning and developing their skills and report strongly positive experiences. It is also evident that many ACAP Educators are enthusiastic and supportive, and enjoy the opportunities that teaching adult students in small classes provide.

Commendation 4

AUQA commends ACAP for the positive learning experiences of its on-campus students and for its commitment to small class sizes.

Individual modules in the past often have been taught to composite classes of students studying for VET, undergraduate and postgraduate degree programs. While the assessment requirements have been stated to be different for students at different qualification levels, in practice this does not always occur. The different learning requirements and expected level of mastery for these awards are therefore not at all clear to students or Educators. ACAP has now recognised this issue and the Panel was informed that from 2008, ACAP will cease to offer composite classes for VET and higher education students. AUQA urges ACAP to ensure that students enrolled for different

awards take modules separately and that the assessment requirements and teaching reflect very clearly the expected levels for each award.

Affirmation 5

[High Priority] AUQA affirms ACAP's phasing out of composite classes of VET and higher education students and encourages ACAP to provide separate classes for higher education students taking undergraduate and postgraduate programs respectively.

2.3.2 Flexible Delivery

Students who choose to take ACAP's modules in online mode or by distance education are less satisfied with some aspects of the quality of their experience than on-campus students. Although students say they appreciate the flexibility offered by these modes, students are not convinced that the benefits of experiential learning are really able to be realised through flexible delivery. Online students are generally positive about the extent to which interaction is possible through the use of discussion boards, but some distance education students feel isolated, even while recognising that they have opportunities to participate in intensive study weekends to experience some of the intense face-to-face interactions that on-campus students enjoy.

One reason some distance education students feel isolated is the varying amount of support from the Educators who assist these students by telephone, email or written contact. Educators for distance education modules are expected to make contact with students early in the module and to maintain regular contact, but the Panel was informed that this does not always happen.

Support for flexible delivery students is centrally coordinated through the Sydney Campus, although staff from Melbourne and Brisbane may be called on to assist flexible delivery students in their respective states. Students studying off-campus may also not be sure who to contact if they have an issue and some report being passed from person to person. The Panel notes that problems with the outsourced delivery of distance education materials in 2006 have been rectified by ACAP, with apologies to affected students.

To improve its quality assurance for flexible delivery students, AUQA suggests that ACAP ensure that Educators' contracts for flexible delivery state more specifically the requirements for student contact and that the College assure itself that these requirements are met by all Educators. ACAP should also consider carefully the aggregated feedback from online and distance education students regarding the extent of interaction and level of support provided by ACAP, with a view to improving this where necessary. This suggestion is consistent with ACAP's planned improvements to survey flexible delivery students to identify gaps in service delivery and to increase the return rate of survey and feedback data from these students.

Affirmation 6

AUQA affirms ACAP's intention to improve support for students taking modules by flexible delivery and encourages ACAP to consider how to structure its flexible delivery to better reflect its distinctive approach to learning.

2.3.3 Fieldwork, Practicum and Psychology Registration

Completion of a fieldwork placement or practicum is an important requirement in several ACAP programs. ACAP offers students assistance in finding fieldwork placements and maintains a large database of organisations that can potentially offer placements. The College has processes in place to review students' experience midway through and at the end of their placement and to

intervene if placements are not proving satisfactory. Feedback is also collected from supervisors. ACAP prepares quantitative evaluation reports on its fieldwork and practicum placements but could do more to identify qualitative improvements and to build relationships with organisations that support fieldwork, as a 'preferred provider' of graduates.

ACAP also offers a Psychologist Registration Supervision Program, for candidates seeking registration as psychologists through their respective State Psychology Registration Boards, which requires completion by each candidate of a specified amount of supervised 'psychology work'. Candidates for registration and supervisors both comment favourably on the support provided by ACAP and its commitment to ensuring that students meet changing State Psychology Registration Board requirements.

2.4 Student Admission, Progress and Feedback

2.4.1 Student Admission and Progress

Students who are considering taking ACAP programs on-campus are interviewed by Course Advisors prior to their admission, which appears to act as a useful filtering device that is seen as helpful by students who are admitted. ACAP recognises prior learning and allows credit transfer. Applications are assessed individually, which is likely to be appropriate for ACAP's scale, although the Panel suggests that approvals be reviewed for consistency.

ACAP does not produce reports or review data on student progression, retention, attrition and academic performance for the College as a whole or for all College campuses and modes of delivery. The Brisbane campus provides an annual report required by the Queensland Office of Higher Education that includes this information. The College has recognised this as a key area for improvement across all campuses and modes of delivery and AUQA urges ACAP to set up systems and reports to review this information (section 3.4.2).

Affirmation 7

AUQA affirms ACAP's plans to undertake greater analysis of student outcome data across the whole College, especially in relation to progression, retention, attrition and academic performance.

2.4.2 Student and Graduate Feedback and Grievance Procedures

For each module, ACAP collects feedback from students in Australia on their experience of teaching and learning. For on-campus students, this feedback is collected in week 4 (preliminary) and week 11 (final) of the twelve-week term. For flexible delivery students, the feedback was previously collected only in week 11 but the Panel was informed that ACAP will also seek feedback in week 4 from 2008. This feedback is reviewed by academic program coordinators on each of ACAP's campuses and Educators are advised of any areas for improvement. Reports on outcomes are provided by program coordinators at meetings of the Executive Committee. Feedback is also obtained from Educators.

ACAP has recognised that this feedback is not aggregated or systematically analysed and has identified a need to better inform the Teaching and Learning Committee, among others, through more extensive and robust analysis of overall feedback.

ACAP also conducts a Biennial Student Satisfaction Survey, the results of which are considered by the Executive Committee. AUQA suggests that ACAP review the type of information it wishes to gain from this survey, the survey design and the processes for analysis and feedback. In particular, the College is urged to undertake a thorough analysis of qualitative responses to this Survey to identify trends or themes. The College has active Student Advisory Committees on

each campus who have the confidence and experience to make their views known, but again the Panel found little evidence of a systematic approach to identifying improvement or advising students of the changes that have been made.

Affirmation 8

AUQA affirms ACAP's intention to better collate and analyse its student feedback, noting that the analysis should focus on identifying themes and systemic improvements and that ACAP should report back to students on the improvements that have been implemented.

The College participated in the Graduate Destination Survey (GDS) managed by Graduate Careers Australia in 2006, recognising that its own monitoring of graduate outcomes was not sufficient to permit it to draw firm conclusions. The 2006 GDS data collected was lost due to an error not of the College's making but information is expected from the 2007 survey.

Commendation 5

AUQA commends ACAP for its initiative in participating in the Graduate Destination Survey, which will provide the College with useful comparative information on graduate outcomes.

As a result of its self-review, ACAP has identified a number of improvements to its grievance and appeal processes, which the Audit Panel supports. These include: additional staff training; a more formal collation of grievance and appeal records; clearer advice to students on what comprises a grievance or appeal within the College's existing policy; and advice on the pathways students should take to lodge grievances or appeals.

2.5 Licensee Operations

ACAP on-campus award programs are offered internationally through a licensee in Malaysia and two licensees in Singapore. The total number of students enrolled through these arrangements is 82. Students are enrolled as ACAP students and ACAP provides its standard curriculum for teaching. Teaching staff are recruited by the licensee organisation to teach the module and to grade assessments (ACAP does not use examinations). The English language admission requirement is an IELTS score of 6. Final approval for admission to the program is given by ACAP's Senior Manager Academic Programs, a point that ACAP may wish to continue to reinforce with staff and students. Licensees can now enrol students using ACAP's eMinerva system (section 3.4.2).

ACAP has current agreements with all licensees that include a schedule of quality assurance elements that are to be evaluated regularly, such as courses, teaching, learning resources, student feedback, administrative arrangements, and student and staff support. ACAP's Managing Director makes six-monthly visits to conduct the quality assurance evaluation, the results of which are recorded, and to talk with the licensees, teachers and students.

To sample these arrangements, the Audit Panel spoke with the managing director and students of one licensee, the Coleman School of Behavioural Sciences in Singapore. Coleman is a small institution that offers programs through two partners, ACAP and Blackburn College in the United Kingdom. ACAP's specialisation in sports psychology is the program for which Coleman has identified an emerging market in Singapore.

ACAP has identified many of the elements of quality assurance in transnational education, including the moderation of results of students studying at Coleman. However, AUQA is not convinced that ACAP has enough control over the licensee operations to guarantee the

equivalence of the student experience and outcomes between its offshore and onshore programs or full control over the marketing material that is used by licensees. The Audit Panel observes that ACAP's principle of experiential learning may not be widely practised offshore and that students in very small programs may not feel able to express concerns direct to ACAP.

AUQA considers that ACAP should become familiar with norms of good practice in transnational higher education and should review its arrangements in this light.

Recommendation 4

AUQA recommends that ACAP assess whether its current arrangements with licensees provide an adequate level of control for it to be assured of the equivalence of the offshore program with onshore on-campus programs, including the standard and nature of teaching and assessment practices and the accuracy of marketing material.

3 ORGANISATIONAL STRUCTURES, DECISION-MAKING PROCESSES AND RESOURCES TO SUPPORT TEACHING AND LEARNING AND OTHER CORE ACTIVITIES

3.1 *Organisational Structures and Decision Making*

AUQA finds that ACAP's structures for decision-making on administrative matters are generally effective, although as noted there is a need to strengthen academic leadership. Directors of the Brisbane and Melbourne campuses are aware of the extent of their authority but also have licence to explore innovations and improvements, and the Panel saw evidence that this is occurring.

The number of permanent staff on each campus is quite small, so it is easy for staff to be involved in meetings and coordinate with others on daily tasks, especially as some staff perform a number of functions. However, ACAP might consider whether some consolidation of discrete functional units would assist it to develop better ways of addressing systemic issues (section 4.1).

All staff travel to Sydney once a year to participate in a Professional Development Day and ACAP has started to make use of a system of 'national teams', to further coordinate specific activities across its campuses. One example is a project begun by the student support coordinators to ensure consistency in practices and learn from issues that arise. AUQA endorses these initiatives, which are conducive to organisational learning and the identification of thematic issues that require attention.

From the information available to the Panel, ACAP's arrangements for student administration and security of student records appear sound, although email communication with students will need to be improved (section 3.4.2).

3.2 *Human Resources Development*

3.2.1 Staff Development and Workforce Planning

ACAP has identified professional development for its current staff as a priority, including the encouragement of greater discussion within the College through in-house seminars and guest speakers. Comments on some other avenues ACAP might consider for staff professional development are contained in section 4.2. As well, ACAP has established an Organisational Development Unit (a committee), with the aim of linking its strategic development objectives with the professional development needs of its staff and of the organisation as a whole. Although this Unit is too recent to have had any impact, AUQA notes it as a positive development, and one that should assist ACAP to undertake better workforce planning, including consideration of the need to bring wider academic and administrative experience into the College.

Affirmation 9

AUQA affirms ACAP's recognition of the need for additional professional development for staff and encourages the College to ensure that its workforce planning considers its future needs for academic as well as administrative skills.

ACAP has stated that it wishes to increase the amount of research undertaken by staff. It appears this is being driven by a need to ensure that those engaged in delivery of planned future programs have understanding and experience of research, rather than a desire for current staff or Educators to develop a research profile. It is suggested that the College clarify its intentions in this regard.

3.2.2 Support for and Retention of Educators

ACAP's dedicated Educators, many of whom are practising professionals in the fields of psychology, counselling or social work, are crucial to its continued success. The Panel was informed that a significant number are recruited by word of mouth.

ACAP has made efforts to ensure that Educators are appropriately inducted to the College. It provides an Educator Handbook that includes its Code of Educational Practice for Teaching and Learning and encourages new Educators to seek advice from mentors. Some new Educators ask program coordinators to conduct an initial peer review of their teaching. All Educators are expected to attend a Professional Development full-day workshop held in February of each year at each campus and a Week 11 End of Term review meeting at each campus. Feedback is sought from Educators through various mechanisms including an Educator Advisory Committee.

Commendation 6

AUQA commends ACAP for its induction of Educators, including its Educator Handbook.

In many respects, ACAP is well-positioned to build on its existing support for Educators to ensure a sustainable body of qualified and committed Educators into the future. Some improvements that could be contemplated to draw Educators more into the academic life of the College are more opportunities for Educators to share their academic philosophies and their teaching practices with others, and workshops to critique the curriculum.

Alongside these professional development opportunities, ACAP must also consider strategies to retain and appropriately remunerate its Educators. ACAP has made available two permanent part-time positions for Educators, thus establishing an avenue for Educators to enter an employment relationship with ACAP, and AUQA considers this a valuable initiative. AUQA also urges ACAP to benchmark the existing duties and rewards of Educators, including their remuneration, against comparable positions in other institutions, to ensure that the College is able to demonstrate to Educators that it is offering them fair rewards and contractual conditions that support their further development as professionals who are higher education scholars and teachers.

Recommendation 5

AUQA recommends that ACAP consider additional means of enabling Educators to contribute to the academic life of the College and benchmark the level of rewards it provides for Educators.

3.3 *Support for Students*

ACAP's fields of study and emphasis on personal support attract students who are interested in working in caring professions but also attract people who wish to explore their own personal issues. In any event, students will inevitably confront their own feelings and experiences during their studies at the College. ACAP also attracts a large number of students who are returning to study and who may therefore be unsure of or unconfident about their academic skills.

Recognising the special nature of its programs, ACAP provides dedicated student support on its Sydney, Brisbane and Melbourne campuses. Student support coordinators provide academic skills and other general workshops, while student counsellors provide individual counselling to students, referring them to other services as necessary. The Audit Panel notes the high degree of personal commitment and involvement shown by student services and support personnel.

Commendation 7

AUQA commends ACAP for recognising the need to provide academic and counselling support to meet a significant level of need among its students.

While ACAP has recognised the need for these support services, the Audit Panel was concerned that ACAP may not have fully identified the depth of the issues it confronts in dealing with its particular student population or be providing the level of support required to enable needs to be met in a sustainable fashion. The College may need to consider whether the screening function of its initial advising of students should be enhanced, to manage the risk of enrolling students who bring serious personal issues to the learning situation.

The Panel was informed that of those students who seek counselling support, a significant number are referred for further counselling. As well, it appears to the Panel that qualified counselling staff, many of whom are part-time, may be struggling to meet demand and may not be on hand to assist if incidents arise in class or during professional experience off-campus. The Panel suggests that as a risk management strategy and to provide better support, ACAP review its practices and resourcing to ensure it is able to meet its duty of care to all students.

Recommendation 6

[High Priority] AUQA recommends that, given the sensitive personal nature of the issues explored by students, ACAP review its practices and the adequacy of resourcing for student support, to assure itself that it has minimised the risks to students and others and is meeting its duty of care.

On the matter of academic skills support, ACAP has identified as an improvement the inclusion of academic skilling and study skills into an existing module on interpersonal skills. AUQA applauds ACAP's intention but suggests that there may be alternative ways of incorporating this education into its programs. AUQA also notes ACAP's intention to develop additional support mechanisms for international students as their numbers increase.

3.4 Infrastructure and Resources

3.4.1 Financial and Physical Resources

ACAP has a five-year rolling budget. Its annual budget is developed by the Managing Director and Director of Finance after consultation with senior staff and is negotiated with Navitas Ltd. The Audit Panel was informed that if additional funding is required for new projects, a business case is put to Navitas, which to date has shown itself willing to make investments in strategic developments for ACAP.

ACAP occupies pleasant premises in central Sydney in a large building leased by Navitas and recently refitted. Its premises in Brisbane are of a good standard and provide a supportive educational ambience. In Melbourne, the College is shortly to move to new premises, having outgrown its current site. ACAP is expected to benefit in future from the level of support and economies of scale provided by being part of Navitas, for example in the areas of marketing, human resources support and information technology. The College is already benefiting from the use of Navitas' Control Self Assessment tool for risk management.

3.4.2 Information Technology and Systems

ACAP has dedicated in-house IT and IS support people, who are responsible for administrative systems and for the support of online learning. The College recently completed the initial implementation of its new eMinerva student learning system for its student administration. The

Audit Panel was informed that this system is HEIMS-compliant and, while some staff find it more difficult to use than the previous system, others regard it as a significant improvement. The eMinerva system captures a great deal of raw data on students and is easily interrogated.

However, it does not as yet have the facility to produce pre-specified reports, which means that each report tends to be individually generated by a particular manager, and may or may not capture the information required. One example is the difficulty ACAP appears to have experienced in providing the Audit Panel with accurate data on students by mode of study and location. Another is the difficulty ACAP has in calculating higher education student EFTSL, although this may be due in part to the highly modular structure of its programs. A set of standard reports would provide valuable quality assurance and performance information for managers and ACAP committees.

Recommendation 7

[High Priority] AUQA recommends that ACAP develop as a matter of urgency a set of standard reports on student information and outcomes, and on consolidated student feedback, to assist managers and committees to readily assess how ACAP is performing on key measures of educational performance and identify areas for improvement.

The College's online modules use the Moodle platform. The Panel viewed an online module which is clearly and simply presented. The ease of use and resources available were commented on favourably by online students. These students log on to ACAP but otherwise ACAP has no system for providing its students with a dedicated ACAP email account. The absence of such a system militates against easy and regular communication with students, as their personal email addresses are likely to change. AUQA encourages ACAP to examine the advantages of providing all students with an ACAP email account to facilitate communication.

The Audit Panel heard that the IT and IS managers in ACAP are discussing the integration of systems across Navitas and notes that such integration would allow ACAP to provide more sophisticated services than it could offer from its own resources.

3.4.3 Library Resources

ACAP has library facilities at each of its three campuses, the largest being a spacious new library area in its Sydney building that is shared with Macquarie City College and the Australian Centre for Languages. ACAP provides a budget for acquisitions on each campus and there are development and operational plans for library facilities as a whole. Students have access to some major electronic databases directly relevant to ACAP programs.

As improvements to current arrangements, AUQA suggests that ACAP clarify responsibility for overall management of its library resources across all its campuses. ACAP intends to increase Educator input in regard to annual acquisitions but needs to ensure as well that an overall academic perspective is provided to the library manager, to assist in collection development and management.

4 MAINTAINING A COMMITMENT TO QUALITY IMPROVEMENT

This section of the Report makes some observations about the quality culture of the organisation and about improving ACAP's quality systems and processes.

4.1 *Development of a Culture for Systematic Improvement*

ACAP has a number of quality assurance processes that are well-established, such as its processes for obtaining feedback from students and processes for curriculum review. While some fine-tuning of these processes has been suggested in this Report, the processes themselves are firmly in place. Other features of ACAP's operations, such as the comparatively small size on each campus, have allowed for a high degree of face-to-face coordination and information sharing that have produced various adjustments and improvement to operations over time.

The College has signalled its commitment to quality improvement through the establishment of a Quality Committee and its new Continuous Improvement Policy. The Managing Director and senior staff are open to suggestions and ideas for quality improvement and ACAP is now implementing various improvements to its academic quality assurance.

The gaps in ACAP's quality assurance processes appear to the Audit Panel to stem largely from weaknesses in the College's internal capability to appreciate and implement improvements in a systemic fashion, a feature that ACAP itself is starting to recognise. Too often, it appears, individual staff take it on themselves to solve problems for individual students in an ad hoc fashion, without any follow-through to identify the need for new policies or practices. This 'atomistic' approach inhibits organisational learning and runs the risk of students being treated inconsistently. It may be a function of ACAP's staffing structure, which relies heavily on part-time staff and the contracted Educators.

Having said this, it is a credit to staff that the ACAP culture reflects many of the sound principles of quality assurance, including: responsiveness to issues and to students; professionalism and respect; a bias towards rectifying problems as they arise; and a willingness to consider improvements. The challenge for ACAP is to meld the actions of individuals into a systematic approach that allows the College to openly discuss and address issues of fundamental importance, not only minor operational matters.

ACAP has identified several improvements to its quality assurance culture to strengthen internal awareness of the need for quality systems. These include encouraging the development of a 'culture of evidence', accompanied by better data analysis, and integration of quality improvements within its strategic and operational planning. AUQA strongly endorses this intent and urges ACAP take practical steps to implement these improvements.

Affirmation 10

AUQA affirms ACAP's intention to encourage the development of a 'culture of evidence' throughout the organisation and ensure the integration of quality improvements within strategic and operational planning.

4.2 *Good Practice and Benchmarking*

ACAP's culture has been oriented towards experiential learning for the counselling and related professions, so there has been comparatively less engagement with wider educational and academic issues. ACAP appears to have been somewhat inwardly-focused, so that new academic

developments are implemented without reference to the experience of other institutions or a knowledge of what is considered to be best practice academically.

It is evident to the Audit Panel that this situation is changing: the advice of external academic advisors is increasingly sought and new managers, with wider experience of other institutions, are bringing ideas and questions that will assist ACAP to develop the capacity it needs to offer even better and more robust programs. As previously indicated, a stronger academic core within ACAP will allow it to more rapidly internalise and implement the suggestions it receives from its external advisors.

The Continuous Improvement Policy sets out the principles and the 'OADRI' model that ACAP intends to use but the College has yet to consider the practical steps that will be required to implement the Policy. AUQA encourages ACAP to develop a plan for its managers and permanent staff to engage with other institutions and experts on specific topics, so that they are aware of good practice and current issues and are able to learn from others when implementing new approaches. Topics might include:

- data-gathering and analysis, including management reporting, to provide evidence of the quality of student outcomes and the results of consolidated student feedback
- academic quality assurance, including: curriculum review; processes to support academic integrity; and moderation
- quality assurance for transnational education programs
- electronic systems for contacting students.

ACAP might also find it helpful to consider participating in, or at least learning about, projects being conducted by the Carrick Institute for Learning and Teaching in Higher Education that could provide some good practice principles for the involvement and support of Educators.

ACAP has stated in its self-review and in its Continuous Quality Improvement Policy an intention to "collect and review evidence on service delivery standards, academic standards and student experience by means of external and internal benchmarking with comparable higher education institutions" (SM03). Staff confirmed this intention in interviews. It is evident however that ACAP has not yet considered how such benchmarking will occur or committed itself to act on this intention. A view was put that ACAP is so unique that benchmarking partners may be difficult to identify. AUQA observes that many elements of ACAP's academic and administrative processes are common to other institutions, even if such institutions have a different educational model. The point is for managers to understand the options that are available and what others view as good practice. AUQA recommends that ACAP undertake benchmarking in selected areas as soon as practicable.

Recommendation 8

[High Priority] AUQA recommends that ACAP implement processes to compare and benchmark its academic and operational processes and outcomes with relevant institutions, in order to implement good practice and thus assure itself that its programs and operations are of a high standard.

APPENDIX A: AUSTRALIAN COLLEGE OF APPLIED PSYCHOLOGY

History and Location

The Australian College of Applied Psychology (ACAP or 'the College') was founded in 1983 as a specialist provider of 'a different education'. ACAP's fee-paying programs have reference to the discipline of psychology but emphasise the practice-oriented and interactive aspects most relevant to fields such as counselling.

ACAP is established as a for-profit company and currently has around 1300 students, operating from campuses in Sydney, Melbourne and Brisbane, and through three overseas licensees. ACAP also franchises its curriculum to several international educational institutions. The College was acquired in 2006 by IBT Education Ltd, which has recently changed its name to Navitas, and is one of a substantial number of companies which are wholly-owned by Navitas Ltd.

Academic Profile

ACAP provides the following higher education programs (2008):

- Diploma of Applied Social Science
- Associate Degree of Applied Social Science
- Bachelor of Applied Social Science (Combined)
- Bachelor of Applied Social Science (Counselling)
- Bachelor of Applied Social Science (Management)
- Bachelor of Applied Social Science (Sport and Performance)
-
- Graduate Certificate in Counselling Skills
- Graduate Diploma of Applied Social Science
- Graduate Diploma of Counselling
- Master of Applied Social Science
- Master of Applied Social Science (Counselling)
- Master of Applied Social Science (Management)

ACAP also provides VET programs and a Psychologist Registration Supervisor Program.

Key Statistics (2007 unless otherwise stated)

Total Higher Education Student Enrolments: headcount @ 31 October 2007:		1309
Offshore Higher Education Student Enrolments headcount @ 31 October 2007 (included in total above):		82
Staff numbers (FT and PT) for Australian campuses	Academic (permanent):	30
	Educators:	109
Total Operating Revenues (year ended 30 June 2007):		\$11.4m
Total Operating Expenses (year ended 30 June 2007):		\$9.9m

APPENDIX B: AUQA'S MISSION, OBJECTIVES, VISION AND VALUES *

Mission

AUQA is the principal national quality assurance agency in higher education with the responsibility of providing public assurance of the quality of Australia's universities and other institutions of higher education, and assisting in enhancing the academic quality of these institutions.

Objectives

AUQA is established to be the principal national quality assurance agency in higher education, with responsibility for quality audits of higher education institutions and accreditation authorities, reporting on performance and outcomes, assisting in quality enhancement, advising on quality assurance; and liaising internationally with quality agencies in other jurisdictions, for the benefit of Australian higher education.

Specifically, the objectives of AUQA are as follows:

1. Arrange and manage a system of periodic audits of:
 - the quality of the academic activities, including attainment of standards of performance and outcomes of Australian universities and other higher education institutions;
 - the quality assurance arrangements intended to maintain and elevate that quality;
 - compliance with criteria set out in the National Protocols for Higher Education Approval Processes;and monitor, review, analyse and provide public reports on the quality of outcomes in Australian universities and higher education institutions.
2. Arrange and manage a system of periodic audits of the quality assurance processes, procedures, and outcomes of State, Territory and Commonwealth higher education accreditation authorities including their impact on the quality of higher education programs; and monitor, review, analyse and report on the outcomes of those audits.
3. Publicly report periodically on matters relating to quality assurance, including the relative standards and outcomes of the Australian higher education system and its institutions, its processes and its international standing, and the impact of the National Protocols for Higher Education Approval Processes on Australian Higher Education, using information available to AUQA from its audits and other activities carried out under these Objectives, and from other sources.
4. Develop partnerships with other quality agencies in relation to matters directly relating to quality assurance and audit, to facilitate efficient cross-border quality assurance processes and the international transfer of knowledge about those processes.

Vision

To consolidate AUQA's position as the leading reference point for quality assurance in higher education in and for Australia. Specifically:

- AUQA's judgements will be widely recognised as objective, accurate and useful, based on its effective procedures, including auditor training and thorough investigation.
- AUQA's work will be recognised by institutions and accrediting agencies as adding value to their activities, through the emphasis on autonomy, diversity and self-review.
- Through AUQA's work, there will be an improvement in public knowledge of the relative academic standards of Australian higher education and an increase in public confidence in Australian higher education.
- Through AUQA's work with other quality assurance agencies, the international quality assurance requirements for Australian higher education institutions will be coherent and rigorous, avoiding duplication and inconsistency.
- AUQA's advice will be sought on quality assurance in higher education, through mechanisms including consulting, training and publications.
- AUQA will be recognised among its international peers as a leading quality assurance agency, collaborating with other agencies and providing leadership by example.

Values

AUQA will be:

- *Rigorous*: AUQA carries out all its audits as rigorously and thoroughly as possible.
- *Supportive*: AUQA recognises institutional autonomy in setting objectives and implementing processes to achieve them, and acts to facilitate and support this.
- *Flexible*: AUQA operates flexibly, in order to acknowledge and reinforce institutional diversity, and is responsive to institution and agency characteristics and needs.
- *Cooperative*: AUQA recognises that the achievement of quality in any organisation depends on a commitment to quality within the organisation itself, and so operates as unobtrusively as is consistent with effectiveness and rigour.
- *Collaborative*: as a quality assurance agency, AUQA works collaboratively with the accrediting agencies (in addition to its audit role with respect to these agencies).
- *Transparent*: AUQA's audit procedures, and its own quality assurance system, are open to public scrutiny.
- *Economical*: AUQA operates cost-effectively and keeps as low as possible the demands it places on institutions and agencies.
- *Open*: AUQA reports publicly and clearly on its findings in relation to institutions, agencies and the sector.

* AUQA's Mission and Objectives were revised in March 2007, as recommended by MCEETYA. AUQA's Vision and Values have been modified accordingly.

APPENDIX C: THE AUDIT PANEL

Dr Jeanette Baird, Audit Director, Australian Universities Quality Agency

Professor Robin McTaggart, Pro-Vice-Chancellor Student Services and Quality Assurance, James Cook University (Panel Chair)

Professor Mark Tennant, Dean of Education, University of Technology, Sydney

APPENDIX D: ABBREVIATIONS AND DEFINITIONS

The following abbreviations and definitions are used in this Report. As necessary, they are explained in context.

ACAP	Australian College of Applied Psychology; Australian College of Applied Psychology Pty Ltd (ABN 94 057 495 299)
APS.....	Australian Psychological Society
AUQA	Australian Universities Quality Agency
College, the.....	ACAP
DEEWR.....	Australian Government Department of Education, Employment and Workplace Relations, formerly DEST
DEST	Australian Government Department of Education, Science and Training
Educator	a person, often a sole trader, who has entered into a contract with ACAP to provide educational services, e.g. teaching and assessment
EFTSL	equivalent full-time student load
FEE-HELP	FEE-HELP is a loan given to eligible fee-paying students to help pay part or all of their tuition fees.
GDS	Graduate Destination Survey (http://www.graduatecareers.com.au/content/view/full/868)
HEIMS	Higher Education Information Management System
HEP(s)	higher education provider(s)
HESA	<i>Higher Education Support Act 2003</i>
IBT	IBT Education Ltd, the former name of the company which owns ACAP (see 'Navitas')
IELTS	International English Language Testing System
IS	information services
IT	information technology
licensee.....	an organisation in a country other than Australia that has entered into an agreement with ACAP that requires the overseas organisation to manage and deliver specified ACAP programs in that country on behalf of ACAP
MCEETYA.....	Ministerial Council on Education, Employment, Training and Youth Affairs
Navitas.....	Navitas Ltd (ABN 69 109 613 309), formerly IBT Education Ltd, the owner of ACAP
NSAI(s)	non self-accrediting institution(s)
OADRI	Objective-Approach-Deployment-Results-Improvement
PACFA	Psychotherapy and Counselling Federation of Australia
PF p	Performance Portfolio page reference
Portfolio.....	Performance Portfolio: Self-Review Report, prepared by ACAP
QAFs	Quality Audit Factors
SCAPE	Society of Counselling and Psychotherapy Educators, Australia
SM	Supporting Material
VET	vocational education and training

