

AUSTRALIAN UNIVERSITIES QUALITY AGENCY

Report of an Audit of
East Coast Gestalt Inc

August 2010

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CONTENTS

OVERVIEW OF THE AUDIT	1
Background	1
The Audit Process	1
CONCLUSIONS.....	3
Introduction to Findings.....	3
Commendations	4
Affirmations.....	4
Recommendations	4
1 INSTITUTIONAL AND EDUCATIONAL OBJECTIVES AND INSTITUTIONAL GOVERNANCE	7
1.1 Mission and Strategic Direction	7
1.1.1 Institutional and Educational Objectives.....	7
1.1.2 Organisational Culture.....	7
1.1.3 Strategic Planning	8
1.2 Institutional Structure and Governance	8
1.2.1 Institutional Structure	8
1.2.2 Business Management	9
1.3 Institutional Governance	10
1.3.1 Governance Procedures and Policy Development	10
1.3.2 Governance Structures.....	11
1.4 Academic Governance and Management.....	12
1.5 Institutional Representation	13
1.5.1 Marketing and Institutional Recognition.....	13
1.5.2 Testamurs	14
2 ACHIEVING EFFECTIVENESS IN TEACHING, LEARNING AND OTHER CORE FUNCTIONS.....	16
2.1 Admission and Progress	16
2.2 Teaching and Learning	17
2.2.1 Principles in Teaching and Learning	17
2.2.2 Teaching Innovation	17
2.2.3 Teaching Arrangements	18
2.2.4 Ethics	18
2.3 Monitoring Standards	18
2.3.1 Assessment and Moderation.....	18
2.3.2 Graduate Outcomes	19
2.3.3 Academic Integrity.....	19
2.4 Research and Scholarship	20
2.4.1 Culture of Scholarship	20
2.4.2 Masters Program	20
2.4.3 Research Skills and Infrastructure	21

3 ORGANISATIONAL STRUCTURES, DECISION-MAKING PROCESSES AND RESOURCES TO SUPPORT TEACHING AND LEARNING	22
3.1 Organisational Structures and Management of Staff	22
3.1.1 Academic and Administrative Staff	22
3.1.2 Staff Appraisal.....	22
3.2 Support for Student Learning.....	23
3.3 Information Resources and Systems.....	23
3.3.1 Library and Online Literacy.....	23
3.3.2 Information Systems.....	24
4 MAINTAINING A COMMITMENT TO QUALITY IMPROVEMENT.....	25
4.1 Review and Evaluation	25
4.1.1 Data Collection and Analysis.....	25
4.1.2 Benchmarking.....	25
4.1.3 Course Review	26
4.2 The Quality Management System.....	26
5 DATA	27
APPENDICES	28
APPENDIX A: EAST COAST GESTALT INC.....	28
APPENDIX B: AUQA’S MISSION, OBJECTIVES, VISION AND VALUES.....	29
APPENDIX C: THE AUDIT PANEL	31
APPENDIX D: ABBREVIATIONS AND DEFINITIONS.....	32

OVERVIEW OF THE AUDIT

Background

In 2003, the Australian Government introduced the *Higher Education Support Act 2003* (HESA) which allows students in non self-accrediting higher education institutions (NSAIs) to receive financial assistance for their tuition fees through the FEE-HELP program. The HESA requires that higher education providers (HEPs) whose students may receive FEE-HELP funds meet a range of quality and accountability requirements, including regular audit by a quality auditing body named in the Higher Education Provider Guidelines. NSAIs approved under the HESA for this purpose may be referred to as NSA-HEPs.

This Report of the audit by the Australian Universities Quality Agency (AUQA) of the East Coast Gestalt Inc (ECGI) provides an overview, and then briefly details the Audit Panel's main findings, and its commendations, affirmations and recommendations. A brief introduction to ECGI, including its mission, vision and principles, is given in Appendix A; the mission, objectives, vision and values of AUQA in Appendix B; membership of the Audit Panel in Appendix C; and abbreviations and definitions used in this Report in Appendix D.

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.mceecdya.edu.au/mceecdya>), the DEEWR *Audit Handbook for non self-accrediting Higher Education Providers*, and other relevant legal requirements or codes to which the organisation is committed. The programs or courses of NSAIs are accredited by government accreditation authorities, so quality audits of HEPs do not include a detailed examination of the academic quality assurance processes for programs of study.

HEP audits, under HESA, consider institutional actions and performance in relation to, firstly, the institution's objectives, and secondly, a group of criteria collectively known as 'Quality Audit Factors' (QAFs). The four QAFs are set out in the Handbook referred to above (and in the AUQA Audit Manual). Their primary purpose is to provide the NSA-HEPs with a framework for the review of certain aspects of institutional performance. In the report of its self-review (the Performance Portfolio or Portfolio), ECGI reported against each of the QAFs. The sections in this Report use the four main topic headings provided by the QAFs, as well as a data section. Within each section, all the criteria for that QAF are addressed, but usually in a holistic way rather than criterion by criterion.

On 7 March 2010, ECGI presented its submission to AUQA, comprising of a three-page introduction, a 65-page report against the individual QAF criteria, appendices and supporting material. The Panel met by teleconference on 29 April 2010 to consider these materials. The Panel conducted the main Audit Visit from 7 to 8 June 2010, and also read registration and other reports of ECGI.

ECGI is a federation comprised of two member institutes, the Sydney Gestalt Institute (SGI) and the Northern Rivers Gestalt Institute (NRGI). In legal terms, ECGI is the principal and the registered higher education institution, while SGI and NRGI are agents that provide ECGI courses pursuant to a Memorandum of Understanding. ECGI and NRGI are each incorporated as not-for-profit associations. SGI is a private company whose constitution provides for the distribution of dividends as would be the case in a for-profit company and it has a single shareholder as Executive Director, who is also the chief executive officer of SGI holding the title of Director of Training. The Panel Audit Visit commenced at the SGI campus at Sydney on 7 June 2010 and concluded at the NRGI campus at Lismore on 8 June 2010.

In all, the Audit Panel spoke with over 40 people during the Audit Visit, including the Board of Governance (BoG) of ECGI, members of the newly formed ECGI Academic Board, directors of SGI and

NRGI, the co-director of SGI, teaching and administrative staff, students, graduates, committee members, and external stakeholders. Sessions were made available for any member of the ECGI 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 8 June 2010, and does not take into account any changes that may have occurred subsequently. It records the conclusions reached by the Audit Panel based on the documentation provided by ECGI as well as information gained through interviews, discussion and observation. While every attempt has been made to reach a comprehensive understanding of ECGI'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 ECGI, 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).

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 this Report.

Introduction to Findings

Considering the institutional and educational objectives of East Coast Gestalt Inc (ECGI), AUQA commends ECGI on the supportive and nurturing environment it provides to students through its member institutes, and on its strong reputation for a practice-based course in Gestalt therapy.

Nevertheless, it was clear to the Panel that although ECGI is the registered higher education institution (HEI) it is not a concrete, stand-alone institution. Described variously by senior staff of the member institutes as a 'legal framework' or as a means of cooperation, it was often difficult for the Panel to gain a clear overall perspective of ECGI as an HEI. Nevertheless, there are some signs of emerging common structures for ECGI, including the development of common IT systems and an 'exclusions policy' to deal with students that are unsuited to studying Gestalt therapy.

At the time of the Audit Visit, an ECGI Academic Board was in the process of being formed. It included external representation and with a remit to provide oversight of all academic policy, programs and quality assurance matters. This new Academic Board should address the lack of any distinct academic governance that came from the previous arrangement which vested the governing body, the Board of Governance (BoG), with responsibility for academic oversight. In finalising the Academic Board's membership and terms of reference, attention should be paid to effective representation of both institutes and to increasing the frequency of meetings to enable effective conduct of academic business.

The current modus operandi and structure of the BoG bear little resemblance to established practices for governing bodies of HEIs, with the BoG meeting only twice each year and with its terms of reference indicating that it advises the directors of the two member institutes who hold the primary responsibility for the management of ECGI. There is a clear need for the BoG to be reviewed and reconstituted to better fulfil its responsibilities under section 17.3.1 of the *National Guidelines for Higher Education Approval Processes* (the National Guidelines), including effective governance and strategic oversight across both member institutes. There is also a patent need for greater separation between the institutional management and academic governance, and for closer attention to compliance with the corporate and constitutional requirements of ECGI, SGI and NRGI, and for more formal modes of operation for the BoG and subcommittees.

The lack of concrete identity for ECGI that was apparent from interviews with staff, graduates, students and external stakeholders is also reflected in the lack of attention to ECGI in marketing, website and student information. SGI and NRGI produce two quite different, dual-badged (ECGI-SGI and ECGI-NRGI) testamurs whose regulatory compliance is uncertain. Greater attention needs to be paid by both member institutes to raising the profile of ECGI as the accredited HEI. The recently-accredited ECGI masters program has been inaccurately represented as coursework and research 'streams' within a single degree, rather than as two different types of masters qualifications, and the accreditation status of this program should be clarified with the NSW Department of Education and Training (NSWDET).

A much more consistent and robust approach is needed in ECGI's approaches to areas such as data collection, management and tracking, benchmarking, learning outcomes for final year students, and moderation of assessment. A culture of scholarship is lacking at ECGI and needs to be developed not only to inform staff teaching and learning but also to help strengthen the provision of research infrastructure and research skills to support students undertaking their final applied project and for prospective students of the masters degree by research. Greater attention needs to be paid to ensuring

that teaching staff providing courses are qualified to the appropriate Australian Qualifications Framework (AQF) level, and to the development of higher education pedagogy among teaching staff. Library resources need enhancing through the development of a functioning interlibrary loan system and greater emphasis should be placed on the development of students’ skills in online information retrieval and evaluation.

Finally, ECGI needs to build a comprehensive and systematic quality management system with clearly delineated roles and responsibilities that span both member institutes, and which includes benchmarking, analysis of data and periodic reviews of academic programs. A follow-up visit by AUQA is needed to enable AUQA to evaluate the progress made on what in many cases are fundamental recommendations.

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 East Coast Gestalt Inc for the supportive and nurturing environment it provides for students through its member institutes.....8
- 2. AUQA commends East Coast Gestalt Inc for its strong reputation in providing a practice-focused education in Gestalt therapy.....17
- 3. AUQA commends East Coast Gestalt Inc for the support for professional development it provides to teaching staff, through its member institutes.22

Affirmations

- 1. AUQA affirms the move by East Coast Gestalt Inc to create an Academic Board with strong external representation to provide oversight of academic policy and programs.13
- 2. AUQA affirms moves by East Coast Gestalt Inc to develop a formal exclusions policy to remove from its programs those students not suited to a career as a psychotherapist.16
- 3. AUQA affirms the move by East Coast Gestalt Inc to develop common IT systems to facilitate admission, enrolment, library services and other administrative functions at both member institutes.....24

Recommendations

- 1. AUQA recommends that the Board of Governance develop an approach to strategic planning that encompasses East Coast Gestalt Inc as a whole and which draws on formal input from both member institutes.....8
- 2. (urgent) AUQA recommends that the Board of Governance of East Coast Gestalt Inc ensure a consistent level of compliance with corporate and constitutional requirements.....9
- 3. (urgent) AUQA recommends that East Coast Gestalt Inc reorganise its operations to effect greater separation of ownership, institutional management and academic governance.10
- 4. (urgent) AUQA recommends that the Board of Governance of East Coast Gestalt Inc adopt formalised procedures to ensure that new or revised policies and terms of reference for subcommittees are appropriately approved and changes recorded.11

5. (urgent) AUQA recommends that the Board of Governance of East Coast Gestalt Inc be reviewed and reconstituted in order to better fulfil the role and accountabilities expected of a governing body, as set out in section 17.3 of the National Guidelines.....12
6. (urgent) AUQA recommends that in finalising the membership and terms of reference for the Academic Board, East Coast Gestalt Inc give consideration to effective representation and input from both member institutes and that meetings be held with sufficient frequency for the Academic Board to conduct business efficiently and to fulfil its terms of reference.....13
7. (urgent) AUQA recommends that East Coast Gestalt Inc review marketing, website and student information, to ensure accurate representation of East Coast Gestalt Inc as the registered higher education institution that owns and awards the accredited higher education courses.....14
8. (urgent) AUQA recommends that East Coast Gestalt Inc seek formal advice from the NSW Department of Education and Training with regard to the regulatory compliance of its testamurs and unaccredited parchments.....15
9. AUQA recommends that, in the interest of continuous improvement, East Coast Gestalt Inc develop a more robust approach to data collection and analysis, and monitoring of trends, with enrolment, attrition and graduation rates recorded, tracked and benchmarked.16
10. AUQA recommends that East Coast Gestalt Inc develop a systematic approach to the improvement of teaching and learning that focuses on the characteristics of higher education.17
11. AUQA recommends that East Coast Gestalt Inc review its teaching arrangements to ensure that academic staff generally hold a qualification at least one AQF level above the level at which they are teaching.....18
12. (urgent) AUQA recommends that the new Academic Board of East Coast Gestalt Inc adopt a consistent and formal approach to internal and external assessment moderation and validation across its member institutes, with the aim of ensuring equivalence of academic standards across both member institutes, and with external higher education institutions.19
13. AUQA recommends that East Coast Gestalt Inc: codify the expected learning outcomes for final year students more fully and in a manner that will, when recorded in a transcript, facilitate credit transfer and articulation; and, implement a robust external validation of graduate outcomes.....19
14. AUQA recommends that East Coast Gestalt Inc strengthen its expectations for scholarly activity as a component of academic work undertaken by staff at member institutes.....20
15. AUQA recommends that East Coast Gestalt Inc seek formal advice from NSW Department of Education and Training regarding the accreditation status of its research masters and the coursework masters programs.....21
16. AUQA recommends that East Coast Gestalt Inc strengthen the development of research skills in graduate diploma students, and develop research support infrastructure for prospective students of the masters degree by research.21

- 17. AUQA recommends that East Coast Gestalt Inc enhance library resources through a functioning interlibrary loan system and that greater emphasis be placed on the development of students’ skills in online information retrieval and evaluation.....24
- 18. (urgent) AUQA recommends that East Coast Gestalt Inc build a comprehensive and systematic quality management system, with clearly delineated responsibilities and consistent policies and practices across both member institutes.....26
- 19. AUQA recommends that East Coast Gestalt Inc have a follow up visit by AUQA 12 months from the publication of this Audit Report.....26

1 INSTITUTIONAL AND EDUCATIONAL OBJECTIVES AND INSTITUTIONAL GOVERNANCE

According to the Portfolio, East Coast Gestalt Inc (ECGI) is a non-profit association that was founded in 1998 and has provided accredited higher education courses in Gestalt therapy since 2002. ECGI functions as a federation of two member institutes, Sydney Gestalt Institute (SGI) and Northern Rivers Gestalt Institute (NRGI). As the registered higher education institution (HEI), ECGI is in legal terms the principal, while SGI and NRGI are agents licensed by ECGI to teach its accredited higher education courses to students. SGI and NRGI provide ECGI courses pursuant to a Memorandum of Understanding (MOU) that details their obligations, as agents, and the conditions under which they are approved by the principal, ECGI, to provide its courses.

ECGI currently has 82 students, all part-time, of whom 58 were studying at SGI and 24 at NRGI (data item 5.1). There appears to have been some fluctuation in student numbers over the past five years (data items 5.2 and 5.3).

ECGI sets out its history, vision, mission and values in Appendix A.

1.1 *Mission and Strategic Direction*

1.1.1 Institutional and Educational Objectives

The constitution of ECGI sets out its primary purposes as:

1. to provide and promote quality education in the field of Gestalt;
2. to offer core Gestalt therapy training which meets the minimum standards of Gestalt Australia and New Zealand (GANZ);
3. to support the applications of Gestalt in the community; and
4. to support research into the practice of Gestalt therapy.

The Portfolio sets out the four principles that guide the mission strategies outlined in the Strategic Plan: practice; diversity; community and heart; and educational excellence. The mission as stated in the Strategic Plan is 'to promote the application of Gestalt theory and practice, to educate competent Gestalt therapists, and investigate the theoretical ground of Gestalt therapy' (Strategic Plan p1). ECGI has a strong practice-based approach to Gestalt education and is guided by the training standards of the relevant professional bodies for Gestalt therapy and for psychotherapy and counselling, namely GANZ and the Psychotherapy and Counselling Federation of Australia (PACFA). ECGI also aims to broaden community knowledge of Gestalt therapy; however, the small number of external stakeholders interviewed by the Panel had no real knowledge of ECGI and there was a limited understanding of the mission and purposes of member institutes. This suggests that more needs to be done by ECGI to fulfil its mission to broaden Gestalt education in the general community. On the other hand, the ECGI mission to promote practice-based Gestalt education, as put into practice by the member institutes, was well understood among staff, students and graduates.

1.1.2 Organisational Culture

The ECGI Portfolio highlights the supportive environment and personal development provided to students. Organisational culture at the two member institutes is strongly student-centred and is closely focused on supporting students to become Gestalt therapists and on encouraging personal growth. Students and graduates appreciated the highly personalised

and nurturing approach of both member institutes, which was manifested in the conduct of group sessions, the feedback given on assessment and the ease of access to teaching staff, including to the directors of the two member institutes. The organisational culture is supportive of different learning styles and students and graduates indicated that interactions with staff were overwhelmingly positive.

Commendation 1

AUQA commends East Coast Gestalt Inc for the supportive and nurturing environment it provides for students through its member institutes.

1.1.3 Strategic Planning

The lack of clarity surrounding the relationship between ECGI, SGI and NRGI and the role and responsibilities of each entity was further evidenced in ECGI's Strategic Plan, which states that 'the Institute' was formed in 1983, when in fact the Portfolio indicates that ECGI was formed in 1998 and SGI in 1983. Most likely this reflects the BoG's emphasis on SGI, rather than ECGI as a whole, that was so evident in interviews. Furthermore, senior management at SGI expressed different views regarding the future directions and growth of ECGI (and SGI) compared with those of senior management at NRGI. SGI saw its future in combining with other Gestalt groups in and around Sydney, while NRGI's management saw the future in terms of expanding beyond Gestalt therapy to allied disciplines. Clearly, there is not a shared view about the future directions of ECGI.

The Portfolio detailed the recent formation of the Directions Group (Teaching and Learning Committee) whose membership includes the Director and co-director of SGI, SGI teaching staff and students studying at the SGI campus. NRGI is not represented in the Directions Group. The terms of reference for this group are eclectic and include placements and further education for graduates, analysis of the curriculum, branding and marketing, and the development of the website. The Panel found that the Directions Group was a useful forum for discussing and sharing ideas regarding the future directions for SGI; however, the Group had no formal status as a subcommittee of the BoG, there were no formal feedback mechanisms between the Directions Group and BoG, the Directions Group has no apparent role in developing and reviewing the Strategic Plan, and it was not providing focused strategic planning for the whole of ECGI.

It was clear to the Panel that robust strategic planning and oversight was not being undertaken by the BoG or by senior management on an ECGI-wide basis, a fundamental requirement for ECGI to function effectively as a stand-alone entity.

Recommendation 1

AUQA recommends that the Board of Governance develop an approach to strategic planning that encompasses East Coast Gestalt Inc as a whole and which draws on formal input from both member institutes.

1.2 Institutional Structure and Governance

1.2.1 Institutional Structure

The lack of clarity around the relationship between ECGI, SGI and NRGI, and the role and responsibilities of each entity made it difficult for the Panel to gain a clear picture of ECGI as a registered HEI.

Although ECGI is the registered HEI in NSW and the owner of the accredited courses, all courses are provided, pursuant to the MOU, by the two member institutes, SGI and NRGI. The Portfolio indicates that ECGI was formed to enable the member institutes to pool their resources to provide the Graduate Diploma of Gestalt Therapy. (ECGI originally included the Illawarra Gestalt Institute, which, according to ECGI documentation, withdrew from ECGI in 2007.)

With regard to the member institutes, SGI was founded in 1983 as a private company. SGI has a single shareholder who is Executive Director of the company and Director of the institute, a role that includes managing SGI's operations and directing academic programs. NRGI was founded in 1992 and is incorporated in NSW as a not-for-profit association that is governed by a management team. The role of the Director of NRGI, who is also a member of the association's management team, includes managing NRGI's operations as well as its academic programs. There is no ECGI-wide management structure and academic programs are administered separately by each member institution, although in the case of SGI some of these duties are shared by a Co-Director. The lack of demarcation between corporate interests, institutional management and academic oversight is an area that needs urgent and close attention and is dealt with further in section 1.2.2 below.

1.2.2 Business Management

The Panel evaluated ECGI's corporate and institutional governance against QAF subcriterion 1.6, which reads as follows:

The governance of the institution is characterised by sound business management practices and exhibits an appropriate level of autonomy from any other business interests of a financial sponsor or owner.

(DEEWR Audit Handbook for non self-accrediting Higher Education Providers)

The MOU requires the agents, that is, the member institutes, to submit annual reports to the BoG addressing, for each individual agent, details of staffing (both academic and administrative), student numbers, library provision and audited financial statements inclusive of forward budget planning. The example supplied to the Panel dated June 2009 was a combined report dealing with both NRGI and SGI and lacked many of the details specified in the MOU, including teaching responsibilities and qualifications, and financial details. Moreover, this report does not appear to have been discussed in the November 2009 meeting of the BoG, the first meeting held after the date on the report. ECGI's constitution requires the establishment and maintenance of a Register of Members; however, at the time of the Audit Visit there was no such formal register of ECGI members. The MOU also indicates that ECGI agents must apply for renewal of approval to teach the Graduate Diploma of Gestalt Therapy every five years.

BoG minutes also show the BoG voting a distribution of a dividend to SGI's Executive Director. At interview, the BoG did not recognise the inappropriateness of the BoG, the governing body of the principal, ECGI, voting dividends to the Executive (company) Director of SGI, ECGI's agent. The corporate governance of ECGI appeared to the Panel to be too closely intertwined with that of its agent, SGI.

Recommendation 2

(urgent) AUQA recommends that the Board of Governance of East Coast Gestalt Inc ensure a consistent level of compliance with corporate and constitutional requirements.

The issues raised regarding corporate governance reflect an intermingling of academic oversight, course delivery and institutional management among ECGI and its agents, in the absence of any overarching leadership at the level of the principal, ECGI.

Although the Panel was advised in documentation that SGI is a not-for-profit company, the company constitution of SGI indicates otherwise as it includes provisions relating to the distribution of dividends to the single shareholder, the Executive Director. In interviews SGI's management was unable to reconcile the distribution of a dividend, which would typically be regarded as a distribution of profit, with claims of SGI as a not-for-profit company. With the Director of SGI (and Executive Director of the company) sitting on the BoG, the new Academic Board that was being formed, and other SGI bodies, as well as having responsibility for managing SGI and for overseeing academic programs, the potential for significant conflict of interest is clear.

Moreover, the BoG, which until recently also functioned as the peak academic body, saw its role essentially as a support for the Director of the SGI. There was a lack of awareness of any potential or real conflicts of interest. It was not clear in documentation whether the use of the title 'Executive Director' was in reference to SGI Director of Training's role as SGI company director or as Executive Director of the incorporated association of ECGI. Under such circumstances, it was questionable that governance and management of ECGI demonstrates 'an appropriate level of autonomy from any other business interests of a financial sponsor or owner'. When combined with the lack of any separation between institutional management and academic oversight noted in sections 1.2.1 and 1.2.2, it was clear that there is an urgent need for ECGI to effect greater separation of ownership, institutional management and academic governance.

Recommendation 3

(urgent) AUQA recommends that East Coast Gestalt Inc reorganise its operations to effect greater separation of ownership, institutional management and academic governance.

1.3 Institutional Governance

1.3.1 Governance Procedures and Policy Development

The Panel had difficulty in gaining a clear picture of institutional governance at ECGI, a situation that was compounded by flaws in the documentation submitted. Policies submitted to the Panel had no dates or indications of provenance. For example, the Panel was provided with two sets of minutes for the BoG meeting of March 2009. The first set of minutes stated that it was from the BoG of SGI and made no mention of NRG. When the Panel sought clarification, a second set of minutes was submitted with additional information relating to NRG and with an indication that it was a set of minutes from BoG of ECGI. Senior staff explained that there had been a transcription error in the first set of minutes provided that had been corrected in the subsequent version. There also were differences in the BoG's terms of reference supplied to the Panel before and after its Portfolio Meeting. It was indicated to the Panel that, with regard to the BoG, '[t]he Directors develop and approve changes to the Terms of Reference when required' (additional information). Nevertheless, senior staff also indicated at interview that the BoG approves the terms of reference for committees and policies.

The apparent mutability in the development of ECGI policy and terms of reference for its governing body and committees was evidenced in relation to its peak academic body. The

Panel was informed variously that academic governance was the purview of the BoG, that consideration was being given to forming an Academic Committee with responsibility for academic governance, and finally, at the Audit Visit, that an Academic Board had been formed and had met to discuss its terms of reference. The minutes of the meeting of the newly formed Academic Board indicated proposed terms of reference and membership different to those which had been submitted to the Panel in relation to the Academic Committee prior to the Audit Visit.

Furthermore, the minutes of meetings submitted to the Panel suggest that the meeting procedure at the BoG is highly informal, there being no clear indications that the Chair formally leads discussions, or that minutes of previous meetings are confirmed. ECGI's BoG would benefit from more formalised meeting procedures.

Despite the lack of any staff employed by ECGI, ECGI must give greater attention to formalising its procedures around institutional governance and, in particular, the development, review and revision of policy and of committee terms of reference, an issue that is of particular importance given ECGI's federative structure which warrants the need for clear, centralised coordination.

Recommendation 4

(urgent) AUQA recommends that the Board of Governance of East Coast Gestalt Inc adopt formalised procedures to ensure that new or revised policies and terms of reference for subcommittees are appropriately approved and changes recorded.

1.3.2 Governance Structures

The lack of formality around ECGI's policy development and governance procedures may reflect the fact that over the past few years ECGI governance arrangements have been in a state of flux following the departure of the Illawarra Gestalt Institute (IGI) and an unsuccessful attempt by one member institution to become a registered HEI in its own right. The current membership of the BoG is somewhat different to what was approved at the time of registration, when it did not include any of the directors or owners of the member institutes. Although ECGI was originally approved as an HEI with a separate Academic Committee, the latter apparently became defunct following the departure of the IGI, and the BoG took on responsibility for academic governance. According to evidence supplied to the Panel, the BoG held responsibility for SGI only in 2008, when it met only once in December, but resumed responsibility for ECGI in 2009. This was confirmed by a notation in the 2008 minutes approving SGI's policy compendium. The governance arrangements that were in place for ECGI in 2008 are therefore unknown to the Panel. Senior staff indicated that NSWDET would have become aware of these changes when an accreditation application was assessed in 2008.

At the time of the Audit Visit, governance arrangements at ECGI did not accord with arrangements typically found in an NSAI, with the terms of reference for the BoG providing for only two meetings per year. Membership of the BoG also varies across documents provided. The actual current membership consists of an external chair, SGI's Director of Training, three professional representatives (one of whom is listed as teaching staff), a staff representative, a student representative and someone designated as an external academic, although this person is also listed in other documentation as teaching staff. This varies from the membership listed in ECGI's constitution.

The Portfolio indicated that the functions of the BoG were: overseeing the pursuit of ECGI's mission; advising the Executive Director on operations from a strategic perspective; monitoring the implementation of the Strategic Plan; overseeing and monitoring the quality of ECGI's operations; conferral of awards; establishing committees; and initiating reviews. A subsequent addition to this list was oversight of the newly formed Academic Board. This reflects ECGI's decision during the period of the audit to remove from the BoG responsibility for the quality assurance of academic programs, which is to be taken up by the new Academic Board. This will be explored in further detail in section 1.4.

It was clear to the Panel that with only two scheduled meetings per year, there was little in the way of governance actually being conducted by the BoG. Simply maintaining continuity was an issue, with the Chair having been absent from one meeting in 2009, and another member indicating attendance at only two (of four) meetings in the previous two years, inclusive of the first meeting held in 2010. In the interview, members of the BoG agreed their role was supporting and advising the SGI Director, rather than ensuring that ECGI was properly governed.

The BoG always met in Sydney and was almost solely focused on SGI matters. Only one member of the Board represented NRGI and this individual did not attend BoG meetings, but instead reviewed meeting papers before and minutes after BoG meetings and sent any comments to the Executive Director of SGI to be passed on to the BoG. The interests of ECGI as a whole and NRGI clearly were not being well served by the membership, functioning and structure of the BoG. As indicated in section 1.2.2, potential conflicts of interest relating to SGI as a private company also were not well recognised or managed by the BoG.

Overall, the BoG must give greater attention to section 17.3 of the National Guidelines and the expectations of a governing body therein as they pertain to institutional oversight, delegation of academic governance, access to appropriate expertise, reporting and delegation arrangements, and arrangements for institutional review. At present these matters are not being addressed adequately by the BoG. The BoG should be reviewed and reconstituted with a view to fulfilling its role as the governing body for ECGI as a whole.

Recommendation 5

(urgent) AUQA recommends that the Board of Governance of East Coast Gestalt Inc be reviewed and reconstituted in order to better fulfil the role and accountabilities expected of a governing body, as set out in section 17.3 of the National Guidelines.

1.4 Academic Governance and Management

In the absence of a delegated peak academic body as set out in section 17.3.1 of the National Guidelines, and with an extremely small academic and professional staff body, ECGI has struggled to meet the expected outcomes detailed in section 17.6 as they relate to assuring standards and to using data, feedback and benchmarking for continuous improvement (section 4.1). It is clear from the minutes of BoG meetings that given the suite of institutional governance responsibilities of the BoG and its infrequent meetings, little attention could be devoted to academic governance. It is in this context that the Panel welcomed recent ECGI developments with regard to the establishment of an Academic Board. While the membership of the new Academic Board submitted to the Panel at the time of the Audit Visit differed from what had been supplied in earlier documentation, ECGI appears to have moved toward a more robust academic governance structure. The Panel was informed that the membership of the new Academic Board is to consist of: an independent academic chair; an independent

academic member; a Director of Training; a student representative; an educator from SGI; an educator from NRGI; and a professional practitioner. The terms of reference, although still under discussion at the time of the Audit Visit and subject to BoG approval, were indicated as including academic policy making, curriculum design, review and delivery, and academic administration. The Panel interviewed an external member of the new Academic Board who was able to give a very clear articulation of the future role of the ECGI Academic Board in assuring academic programs and standards, which led the Panel to conclude that, at the time of the Audit Visit, ECGI was moving in the right direction in terms of academic governance.

Affirmation 1

AUQA affirms the move by East Coast Gestalt Inc to create an Academic Board with strong external representation to provide oversight of academic policy and programs.

Nevertheless, concerns remain in relation to ensuring that the emergent Academic Board has sufficient input to provide effective academic governance for ECGI as a whole, including across both member institutes. There needs to be effective representation and input from NRGI as well as SGI, which means active NRGI participation in meetings. It is critical that the new Academic Board be able to assure academic equivalence across both institutes, something that could not be guaranteed under academic governance and management arrangements to date. It is doubtful that the new Academic Board could acquit its functions adequately if it meets only twice per year, which would give insufficient time across the year for discussion of teaching and learning matters or the development of academic policy. It is not uncommon for academic boards of NSAs to meet at least twice per semester. Furthermore, in view of ECGI's small size and the potential for conflicts of interest raised in section 1.2.2, ECGI also would benefit from additional external academic input on its emergent Academic Board.

Recommendation 6

(urgent) AUQA recommends that in finalising the membership and terms of reference for the Academic Board, East Coast Gestalt Inc give consideration to effective representation and input from both member institutes and that meetings be held with sufficient frequency for the Academic Board to conduct business efficiently and to fulfil its terms of reference.

1.5 Institutional Representation

1.5.1 Marketing and Institutional Recognition

There was a noticeable lack of information regarding ECGI in marketing material, website information, and student readers provided by the member institutes. Moreover, the information provided was often misleading as to the status of ECGI as the registered institution, with SGI and NRGI as agents delivering ECGI's courses.

It was not surprising then that the Panel found little awareness of ECGI as the registered higher education institution (HEI) on the part of staff, students, graduates and external stakeholders. All staff were directly employed by the member institutes, while students and graduates overwhelmingly regarded themselves as being or having been students of one or the other of the member institutes. External stakeholders had little or no awareness of ECGI.

ECGI's Board of Governance and the senior management of its member institutes, SGI and NRGI, must ensure that students and prospective students receive accurate information regarding the HEI with whom they are enrolled and which awards their degree.

Recommendation 7

(urgent) AUQA recommends that East Coast Gestalt Inc review marketing, website and student information, to ensure accurate representation of East Coast Gestalt Inc as the registered higher education institution that owns and awards the accredited higher education courses.

1.5.2 Testamurs

The issue of accurate representation of ECGI and its member institutes also arose with regard to the testamurs. NRGI and SGI issue entirely different testamurs with a different background and different wording. The testamurs sighted by the Panel were dual-badged, with the SGI testamur indicating the award was conferred by ECGI and SGI, and the NRGI testamur having both ECGI and NRGI logos. The two sets of testamurs give the distinct impression that SGI and NRGI are stand-alone registered HEIs delivering the awards in conjunction with ECGI, when this is not the case.

Over the four-year duration of the course, documents are issued to students at the completion of each year of part-time study, including an 'Introductory Certificate of Gestalt Counselling' after one year, a 'Certificate of Gestalt Counselling' after two years, and a 'Diploma of Counselling' after three years, none of which is accredited. In the case of NRGI testamurs, the only difference between the unaccredited parchments and the accredited testamur is an unobtrusive signifier that the unaccredited parchments represents year one, year two or year three of the graduate diploma, while this signifier is entirely absent from SGI documents. These similarities would make it difficult for students, graduates or an external party to distinguish between unaccredited and accredited parchments. This is of particular concern with regard to the unaccredited diploma parchment awarded to students. Although 'diploma' is not a protected term, it is an AQF award in both the VET and higher education sectors and an institution could be in breach of the National Protocols if it represented an unaccredited award as accredited.

A further important issue is compliance with section 17.3.1 of the National Guidelines, which states that the 'legally constituted governing body', in this case the BoG, has responsibility for conferral of an institution's higher education awards. The NRGI awards are conferred with a single signature from the 'Director of Training', while the SGI awards are conferred by the 'Directors'. There is no mention in either set of testamurs of the BoG as the conferring body and testamurs are not signed by the Chair of the BoG. Apart from issues of compliance with the National Guidelines, the appearance of only one signature on testamurs also increases the risk of fraudulent testamurs, particularly in the absence of any unique identifiers or seals on NRGI and SGI testamurs.

In view of the serious concerns that the Panel had regarding the compliance of testamurs issued in the name of ECGI with section 17.3.1 of the National Guidelines, and with regulatory requirements in general, the Panel concluded that there was an urgent need for ECGI to seek formal advice from NSWDET with regard to the regulatory compliance of the testamurs and the unaccredited parchments it awards to students.

Recommendation 8

(urgent) AUQA recommends that East Coast Gestalt Inc seek formal advice from the NSW Department of Education and Training with regard to the regulatory compliance of its testamurs and unaccredited parchments.

2 ACHIEVING EFFECTIVENESS IN TEACHING, LEARNING AND OTHER CORE FUNCTIONS

All students at ECGI are currently enrolled in the Graduate Diploma of Gestalt Therapy, which is conducted part-time over four years. In 2009, ECGI had accredited a Master of Counselling (Gestalt Therapy), although as yet there are no students enrolled in this course. Without exception students and graduates interviewed felt that they received excellent preparation as Gestalt therapists from the ECGI member institutes. Course provision and teaching and learning at ECGI member institutes were singularly focused on the graduate diploma program and the embedded group therapy component.

Overall, there is a need to monitor for continuous improvement and for greater formalisation of approaches to teaching and learning and assessment moderation. Presently, there is little recourse to external comparators or benchmarks beyond the use of guest lecturers and involvement in GANZ.

2.1 Admission and Progress

The data collected by ECGI's member institutes over the past few years lacked sufficient robustness for the Panel to form a clear picture of admission and progression at ECGI. For example, it would appear that a significant proportion of ECGI's graduate diploma students, perhaps half, have been admitted to the graduate diploma on the basis of 'equivalence' provisions, without having completed a bachelor degree; however, there has been no formal tracking of how these students' academic achievement levels compared with students who have entered on the basis of a bachelor degree (data item 5.4). Documentation seemed to suggest that attrition rates could be high in some years, although this is difficult to confirm. Data collected on admission and progression is not benchmarked nor is performance formally tracked over time.

Recommendation 9

AUQA recommends that, in the interest of continuous improvement, East Coast Gestalt Inc develop a more robust approach to data collection and analysis, and monitoring of trends, with enrolment, attrition and graduation rates recorded, tracked and benchmarked.

Another issue that arose during the audit was how ECGI approached the issue of exclusion of students where it emerged that they were unsuited for a career as a therapist. There was some evidence from students that closer attention could be paid to screening students prior to admission, although students and graduates indicated that both member institutes had handled issues of inappropriate student conduct in therapy sessions discreetly and appropriately. It would appear that in practice the ECGI member institutes have appropriate practices in dealing with students who are not suited to work as a therapist. Nevertheless, the Portfolio also acknowledged the need to improve the early identification of students not suited to a career in psychotherapy. The development of an exclusions policy was an issue for discussion by the BoG and the newly formed Academic Board at the time of the audit.

Affirmation 2

AUQA affirms moves by East Coast Gestalt Inc to develop a formal exclusions policy to remove from its programs those students not suited to a career as a psychotherapist.

The newly formed Academic Board and the BoG will need to ensure that once an exclusions policy is developed, it is consistently applied across ECGI as a whole.

2.2 Teaching and Learning

2.2.1 Principles in Teaching and Learning

Staff of the member institutes of ECGI pride themselves on the practice-based education they provide to their students through the graduate diploma. The ECGI curriculum policy indicates that the program provides a minimum of 600 hours of therapy practice spread across a minimum of four years, so as to enable students to 'integrate their personal and clinical learning' (PF p109). Students and graduates gave strong endorsement to the practice-based approach to teaching of ECGI member institutes, and attested to the rigour of the ECGI program in terms of educating and preparing Gestalt therapists, while also providing for personal growth. External stakeholders also indicated that ECGI member institutes have a strong reputation for producing competent Gestalt therapists.

Commendation 2

AUQA commends East Coast Gestalt Inc for its strong reputation in providing a practice-focused education in Gestalt therapy.

2.2.2 Teaching Innovation

ECGI's Portfolio indicated that ECGI was in the process of implementing a teaching portfolio for teaching staff. At the time of the Audit Visit, teaching portfolios had been introduced only at SGI. Whilst staff were very conscious of their identities as experienced therapists and took very seriously their guidance of students as beginning therapists, they seemed largely unaware of their roles as tertiary sector teachers. Moreover, the teaching portfolios, while a positive start, do not address higher order pedagogical issues and there was a lack of awareness of these issues among teaching staff. While teaching staff are strongly engaged in issues around the practical sessions, the same could not be said for academic issues around teaching and learning. For example, there was no apparent use or awareness of Australian Learning and Teaching Council resources, and personal development in training and assessment tends to be oriented solely towards the delivery of vocational education and training (VET) courses. In general, there seemed to be a strong vocational training approach to course provision that was evident both in documentation and in how staff members understood and talked about their work.

The Directions Group (Learning and Teaching Committee) is meant to have teaching and learning within its purview; however, it was clear from the Audit Visit that while there might have been some useful discussion of teaching and learning issues being experienced by individual staff, there were no formal feedback loops for this group to have input into the development of overall teaching and learning priorities at ECGI.

Recommendation 10

AUQA recommends that East Coast Gestalt Inc develop a systematic approach to the improvement of teaching and learning that focuses on the characteristics of higher education.

2.2.3 Teaching Arrangements

Across the two institutes, 37 teaching staff were listed, the overwhelming majority being sessional staff, either on short-term fixed contracts or teaching on a casual basis. Of the staff listed as teaching in the graduate diploma, 19 appeared to hold cognate, and four non-cognate, qualifications one AQF level above the award into which they were teaching. Four held a Graduate Diploma in Gestalt Therapy, nine held qualifications below the level they were teaching, and one tutor had no listed qualifications. In terms of the Master of Counselling (Gestalt Therapy), seven of the teaching staff listed appeared to hold cognate, and two non-cognate, qualifications above the level they were to teach, while one staff member held a qualification at the same level. As will be discussed in section 2.4.3, there are issues related to the level of qualifications and expertise of supervisors in the masters by research program. There is a clear need for the newly created Academic Board and the institutes' directors to pay closer attention to ensuring that SGI and NRGI staff teaching in the ECGI awards are appropriately qualified.

Recommendation 11

AUQA recommends that East Coast Gestalt Inc review its teaching arrangements to ensure that academic staff generally hold a qualification at least one AQF level above the level at which they are teaching.

2.2.4 Ethics

ECGI recently has formed an Ethics Committee, specifically to review projects that will be undertaken by students in its masters program. The Ethics Committee is yet to meet. Currently, the committee does not have any role regarding ethics approval in relation to the final applied project undertaken by fourth year students in the graduate diploma. It would be appropriate for the Ethics Committee to consider the need for ethical clearance for these projects as well.

2.3 Monitoring Standards

2.3.1 Assessment and Moderation

The Portfolio indicated that moderation of assessment occurred through dual marking and through assessment validation meetings. However, it emerged at the Audit Visit that these techniques in the interests of consistent academic standards are not uniformly applied across ECGI. For example, dual marking occurs only at SGI, not NRGI. At SGI, if there are notable discrepancies between the two marks given, the two markers discuss the discrepancy, and then if agreement cannot be reached, refer the matter to the Director of Training. External moderation consists of input from visiting lecturers and external marking of the final applied project.

The validation meetings referred to in the Portfolio appear to be the informal discussions held by staff regarding marks assigned to written work. No formal records are kept of these meetings, with minutes and decisions recorded. The BoG does not receive moderation reports spanning the two member institutes. The highly informal nature of assessment moderation at ECGI is of particular concern as SGI and NRGI are permitted to vary course content and assessment approaches by up to 20%, and this concern is not allayed by occasional recourse to cross-institute marking of assessment tasks. Furthermore, the use by the two member institutes of different external examiners to assess the final applied project makes it difficult to

be assured of equivalence of graduate quality across the institutes. A common panel of assessors would help to ensure equivalence.

Students at ECGI complete assessment items within a very supportive environment, where staff give them every chance to succeed. Students are permitted to resubmit assessment tasks, with feedback and assistance from teaching staff, until they reach a satisfactory standard. Some students are counselled out of the course when they are struggling to meet expectations. Others choose to withdraw voluntarily, rather than resubmit an unsatisfactory assessment item. There are almost no outright failing grades. Whilst numerical grades are recorded by markers these are not supplied to students, who are only given indications of fail, pass, credit, distinction or high distinction. This practice presents particular issues with regard to the production of a transcript and the portability of the graduate diploma (section 2.3.2).

Given the unevenness of assessment and moderation practices across ECGI, there is a clear need to determine equivalence of standards across both member institutes and with other HEIs.

Recommendation 12

(urgent) AUQA recommends that the new Academic Board of East Coast Gestalt Inc adopt a consistent and formal approach to internal and external assessment moderation and validation across its member institutes, with the aim of ensuring equivalence of academic standards across both member institutes, and with external higher education institutions.

2.3.2 Graduate Outcomes

The assessment framework at ECGI could present problems in terms of the portability of the graduate diploma should an ECGI graduate wish to articulate into a masters degree at another institution, or an ECGI student want to receive credit transfer or recognition of prior learning for ECGI subjects. The pass/fail assessment of the therapy components of the course, and the practice of not giving students a numerical grade for their written work makes it difficult for students and graduates to demonstrate their learning outcomes and graduate attributes to an external audience. The lack of standard transcripts at SGI and NRGI needs to be addressed.

Graduate attributes for final year students currently address in global terms the student's personal development, attendance at group sessions and preparation as a Gestalt therapist. Given the current national emphasis on formally assuring learning outcomes at the program level, the intended learning outcomes of the graduate diploma need to be articulated in a more specific and robust manner. Although the award curriculum complies with the competencies specified by the professional body GANZ, currently there is no formal benchmarking of learning outcomes and graduate attributes against those of other HEIs.

Recommendation 13

AUQA recommends that East Coast Gestalt Inc: codify the expected learning outcomes for final year students more fully and in a manner that will, when recorded in a transcript, facilitate credit transfer and articulation; and, implement a robust external validation of graduate outcomes.

2.3.3 Academic Integrity

SGI and NRGI provide written information to students on plagiarism in student readers and the issue also is discussed by teaching staff. Students and graduates agreed there was a high level

of awareness of what constituted plagiarism and indicated that the very nature of a Gestalt course, with its emphasis on personal development and experience, was inimical to plagiarism. This view was expressed consistently by teaching staff, by directors of training, in the Portfolio and in supporting documentation. Only one suspected case of plagiarism could be recalled, and that seems to have been resolved satisfactorily, after discussions with one of the directors.

Notwithstanding ECGI's views, any higher education course that involves reviewing and analysing literature and presenting an argument in the form of a written assignment or oral presentation is at risk of students using the work of another author without proper attribution. This is a matter that needs closer consideration on the part of the newly formed Academic Board to ensure that good practice is being followed with regard to academic integrity.

2.4 Research and Scholarship

2.4.1 Culture of Scholarship

The evidence for ongoing research and scholarship on the part of academic staff at ECGI member institutes was very limited. Whilst there was evidence of academic staff being supported to attend Gestalt workshops and conferences, documentation supplied to the Panel indicated that most staff did not publish regularly in scholarly journals or engage with contemporary scholarly literature. Although the ECGI Professional Development Points System theoretically allocates points for research and scholarly activity, there was little evidence that academic staff devote any notable period of time to scholarly pursuits, nor was there any genuine expectation that they do so. Some documentation made it clear that teaching was the key function for academic staff. Scholarship was desirable, but it happened outside of working hours. Scholarship in teaching and learning also was not well understood. The absence of any recent texts in course reading lists provided further evidence of a need to improve scholarly engagement, particularly if ECGI has aspirations to provide a masters course by research.

Recommendation 14

AUQA recommends that East Coast Gestalt Inc strengthen its expectations for scholarly activity as a component of academic work undertaken by staff at member institutes.

2.4.2 Masters Program

In 2009, ECGI had a masters program approved by NSWDET. In NRG's documentation this program is presented as a Master of Counselling (Gestalt Therapy) with two 'streams' — a 'coursework stream' and a 'research stream'; however, the NSW State Register of Higher Education lists only a coursework masters program. The curriculum plan provided to the Panel indicates that the ECGI masters program in fact consists of two different types of masters courses as defined in the AQF, with one course consisting overwhelmingly of coursework with a major project/minor thesis, and the other course consisting almost entirely of a 40,000 thesis with a research preparation course. The AQF defines a research masters degree as requiring the completion of a thesis to satisfy at least two-thirds of the degree requirements. Furthermore, in the higher education sector the word 'stream' generally denotes a specialisation within a particular course, for example, a hospitality stream within a Bachelor of Business, and not a degree pathway.

When questioned, the directors of NRG and SGI indicated that they understood that what had been accredited was two types of masters degree, a research masters and a coursework masters. ECGI clearly needs to clarify the accreditation status of its masters program/s.

Recommendation 15

AUQA recommends that East Coast Gestalt Inc seek formal advice from NSW Department of Education and Training regarding the accreditation status of its research masters and the coursework masters programs.

2.4.3 Research Skills and Infrastructure

To ensure the quality of course provision, if ECGI is to offer a research masters degree, it will need to develop higher degree research infrastructure, particularly in relation to research supervision and the development of research skills. Currently, ECGI has no supervisors register and does not hold the details of the supervision experience of the proposed research supervisors. ECGI holds the curriculum vitae of only two of the three proposed supervisors, and the details provided in the case of one of these did not suggest any publication activity in recent years. 'Outsourcing' the provision of the research masters to external academics, as was being discussed by the new ECGI Academic Board at the time of Audit Visit, would not absolve ECGI from the need to develop research infrastructure and a research culture.

Some graduates indicated that more support needs to be provided to students undertaking their final applied project in the graduate diploma. Closer supervision of the final thesis is needed, including greater assistance with researching topics and writing the thesis. Final year graduate diploma students also would benefit from the development of a stronger research culture and a greater focus on teaching online research skills in the program, to prepare them for the literature reviews expected as a component of their applied projects. The development of an interlibrary loan system also would assist them in this regard (section 3.3).

Recommendation 16

AUQA recommends that East Coast Gestalt Inc strengthen the development of research skills in graduate diploma students, and develop research support infrastructure for prospective students of the masters degree by research.

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

In organisational terms, ECGI is fundamentally a collaborative arrangement between two independent institutes, SGI and NRGI, with the only ECGI structures being the BoG and the emergent Academic Board. All staffing, both administrative and academic, is managed independently by each member institute which, as discussed in chapters 1 and 2, raises issues with regard to central coordination, academic policy, course provision, and assessment moderation. The need for central coordination also is apparent in the provision of support for student learning, particularly in relation to information resources.

3.1 *Organisational Structures and Management of Staff*

3.1.1 Academic and Administrative Staff

The staffing complement at SGI and NRGI is very small. The NRGI ongoing staff base consists of the Director of Training (the only full-time academic) and four administrative staff employed on a very limited fractional or contract basis to support IT, library and general administration. SGI staffing consists of the Executive Director, the Co-Director and one administrative staff member employed five hours per week. Apart from the directors, all teaching staff at SGI and NRGI teach on a part-time basis and are employed on either yearly part-time contracts or on a casual basis. Academic staffing, including management of workload, is administered independently by each member institute.

The Portfolio provided evidence of a Staff Recruitment policy, although it was not clear whether this was an ECGI or SGI policy. In practice, staff recruitment at NRGI and SGI is fairly informal and based around networks of former students and the Gestalt community.

NRGI and SGI have separate professional development policies for academic staff, but all SGI and NRGI teaching staff are required to meet continuing professional development requirements set down by the Psychotherapy and Counselling Federation of Australia and GANZ. Teaching staff endorsed the SGI and NRGI approach to staff professional development, confirming that both member institutes support them to attend Gestalt conferences and workshops. This is positive, particularly given the sessional nature of teaching staff, and this commitment should be strongly supported by the new ECGI Academic Board.

Commendation 3

AUQA commends East Coast Gestalt Inc for the support for professional development it provides to teaching staff, through its member institutes.

3.1.2 Staff Appraisal

Staff at SGI and NRGI undergo an annual performance appraisal, during which student assessment of teaching may be discussed. Unsatisfactory performance results in a non-renewal of teaching contracts. Students and graduates indicated that both member institutes respond well to student feedback on teaching staff. Teaching staff are subject to twice yearly supervision of group sessions by the directors of training. Therapy sessions conducted by teaching staff are also subject to clinical supervision from the directors of training four times a year.

The extent to which teaching effectiveness in a higher education context is addressed in performance appraisals was not clear, beyond discussions of student feedback. The teaching portfolio being implemented at SGI, and planned for NRGI, is a useful start, but further development of the portfolio and discussions around it are needed (section 2.2.2). The inclusion of staff scholarly activities in the portfolio and in performance appraisal discussions would help promote a culture of scholarship across ECGI's member institutes (section 2.4.1). Finally, it was not clear how or by whom the performance of the directors of training is evaluated. AUQA advises ECGI to include this as a function of a newly reconstituted BOG. (section 1.3).

3.2 Support for Student Learning

Students at both institutes reported feeling very well supported by the staff. Perhaps because of the very small scale and the intensely personal nature of the program, students and staff came to know each other well, and students generally felt very comfortable approaching staff whenever they needed assistance with their learning. NRGI provides subsidised private tutoring to students who need assistance. However, there is little formalised academic or non-academic student support provided by member institutes, largely owing to their small size and small number of students. Counselling support is seen as being provided through the group therapy component of the course and the requirement that students undergo extensive personal therapy.

3.3 Information Resources and Systems

3.3.1 Library and Online Literacy

Information resources are starkly different at the two member institutes. The NRGI library holds 1,500 books and journals, while SGI holds 300 volumes. NRGI library books are barcoded, loans are recorded electronically and the library is managed by an administrative staff member with some library training. SGI's small collection is loaned using an 'honour system' where loans are manually recorded on cards by borrowers, and acquisitions are catalogued by the part-time administrative staff member who does not hold any library qualifications. Interviews with academic and administrative staff, graduates and students confirmed that currently there is no active interlibrary loan system to enable ECGI students to borrow books from both libraries. NRGI has plans to develop an ECGI-wide interlibrary loan system and the SGI and NRGI library catalogues will soon be online. There appears to be no formal acquisitions policy, but the Director of NRGI reports purchasing around 50-60 books every 18 months, most purchases happening during professional visits to the USA. SGI acquires books when requested by staff and students. ECGI subscribed to the Cengage electronic database, but it seems little use is made of online resources.

With no formal teaching of online research skills, literacy in online resources and skills development in online research was very limited among staff, students and graduates. The Director of NRGI is enthusiastic about the potential of online resources to assist in teaching and learning and for developing research skills, but the value of online resources was discounted by several staff, students and graduates.

The development of an interlibrary loan system and of online information retrieval skills would benefit ECGI students overall, in particular students undertaking the final year applied project and prospective students for the masters program.

Recommendation 17

AUQA recommends that East Coast Gestalt Inc enhance library resources through a functioning interlibrary loan system and that greater emphasis be placed on the development of students' skills in online information retrieval and evaluation.

3.3.2 Information Systems

The Portfolio indicated the development of a centralised information database for ECGI as an area for improvement. This process is being driven by NRGi where the information system is being trialled before being implemented across both ECGI member institutes. The system has been two years in the making, including design and implementation, and the process of building the SGI system began only two months prior to the Audit Visit. An IT specialist has been employed by NRGi with a brief to integrate the NRGi and SGI information systems. While at present admissions are handled separately by each member institute, under the proposed common system, NRGi administrative staff will do all ECGI admissions.

Affirmation 3

AUQA affirms the move by East Coast Gestalt Inc to develop common IT systems to facilitate admission, enrolment, library services and other administrative functions at both member institutes.

The Panel noted, however, that the development of the integrated information system has proceeded without strategic planning or oversight by the BoG. A newly reconstituted BoG will need to have greater oversight of such operationally important matters.

4 MAINTAINING A COMMITMENT TO QUALITY IMPROVEMENT

ECGI's underdeveloped approach to quality assurance brings to the fore the need to develop a centralised and consistent quality management system to drive continuous improvement across both of ECGI's member institutes. Components should include monitoring of data, benchmarking, and course review. ECGI's activities in relation to teaching and learning, academic governance, and organisational management have been mentioned in relevant sections of this Report. This section provides comment on the overarching quality systems.

4.1 *Review and Evaluation*

4.1.1 Data Collection and Analysis

Very little data on the quality of ECGI's programs is currently collected or analysed. To date there has not been a systematic approach to surveying staff, students and graduates, although member institutes have undertaken some limited qualitative surveying. After making some initial notes about the survey data, the raw data (and subsequently the notes) have generally been destroyed, with the result that there is only minimal evidence of quality data recorded. The only survey data provided to the Panel was a collection of positive statements made in the 2009 survey of students of the graduate diploma.

Recent response rates to surveys have been very poor – only four graduates and two staff members completed the last graduate and staff surveys, respectively. ECGI does not seek feedback on graduates from external employers or stakeholders, nor is regular feedback sought from graduates that have moved into private practice. The Director of NRGi has taken to seeking feedback orally through conversations and telephone calls, but this data is not recorded.

Other types of quality data, including demand and attrition data, progression rates, learning outcomes data and graduate destination data, also need to be carefully collected and formally recorded, as part of the ECGI quality system.

Survey and other quality data needs to be collected, retained, and properly recorded and analysed, with a view to tracking improvements over time, whether they be in course provision, student support, staff development, graduate outcomes or course development. Such data helps to identify areas where improvements are needed and to track progress as changes are made in the interests of quality improvement. The recent development by SGI of a student feedback survey with four questions using a 1-5 Lickert scale provides a useful start upon which to build.

There is a clear need for a reconstituted BoG to implement a more systematic and robust quality management system, including the surveying of staff, students, graduates and external stakeholders. This matter is taken up in Recommendation 18 (section 4.2).

4.1.2 Benchmarking

Not surprisingly, given the paucity of data at ECGI, there are no formal benchmarking agreements and there is little benchmarking undertaken. The lack of any external benchmarking makes it difficult for ECGI to measure, for improvement purposes, where it stands vis-à-vis other HEIs, to monitor and act on trends in teaching and learning in the higher

education sector, and to validate the learning outcomes of ECGI's students and graduates compared with those from similar programs.

ECGI's benchmarking is limited to discussions at meetings of the Higher Education Small Providers Association that the SGI Director attends, and ECGI's involvement with GANZ and Gestalt Directors of Training (DOT) meetings. The DOT meetings include Gestalt organisations that do not offer accredited higher education awards, so those comparisons may not be relevant. A benchmarking document supplied to the Panel at the Audit Visit did not actually compare ECGI's graduate diploma with the courses identified in the document. This matter is taken up in Recommendation 18 (section 4.2).

4.1.3 Course Review

ECGI nominally has a course review committee. However, it has not met since 2007 and its terms of reference provide for it to review the ECGI graduate diploma only once every five years as part of the accreditation cycle. Whilst a major periodic review on a five-yearly cycle is common practice across the sector, there is also a need for ongoing review of course quality, drawing on trends in teaching and learning and curriculum development, recent scholarship, and analysis of feedback from students, graduates, staff and external stakeholders. Continuous improvement of course curricula and provision cannot be accomplished with only a quinquennial review. This matter is taken up in Recommendation 18 (section 4.2).

4.2 *The Quality Management System*

The quality assurance framework at ECGI is rudimentary, with isolated examples of quality assurance practices in the individual member institutes, but no clear strategy for implementing a quality management system that is geared towards continuous improvement. The formation of a new Academic Board with responsibility for quality assurance is a positive step forward; however, with no centralised coordination, there is a need for senior staff to act as an executive and establish consistent quality assurance strategies that span both member institutes.

Recommendation 18

(urgent) AUQA recommends that East Coast Gestalt Inc build a comprehensive and systematic quality management system, with clearly delineated responsibilities and consistent policies and practices across both member institutes.

The quality management system should include: a rigorous approach to recording and tracking data; external benchmarking; regular review and evaluation of feedback from students, graduates and external stakeholders; and regular review of course curricula. The formation of the new Academic Board and the reconstitution of the BoG, as per Recommendation 5, will facilitate the development of a quality management system.

The recommendations in this Report are in large part developmental and in many cases are critical to ECGI's capacity to sustain higher education provision. It is for this reason that AUQA recommends a follow-up visit by AUQA 12 months from the publication of the Report to assess progress in the implementation of its recommendations.

Recommendation 19

AUQA recommends that East Coast Gestalt Inc have a follow up visit by AUQA 12 months from the publication of this Audit Report.

5 DATA

Item 5.1: Table of 2010 student numbers for Graduate Diploma of Gestalt Therapy by headcount

	Year 1	Year 2	Year 3	Year 4	Total
SIGI	12	17	15	14	58
NRGI	7	1	7	9	24
ECGI	19	18	22	23	82

Source: East Coast Gestalt Inc.

Item 5.2: Table of 2009 student numbers for Graduate Diploma of Gestalt Therapy by headcount

	Year 1	Year 2	Year 3	Year 4	Total
SIGI	18	22	15	10	65
NRGI	7	9	1	3	20
ECGI	25	31	16	13	85

Source: East Coast Gestalt Inc.

Item 5.3: EFTSL trend of attendance type

Year	2005	2006	2007	2008
Total EFTSL	16.5	29.4	51.1	43.1

Source: Higher education statistics collection, DEEWR.

Item 5.4: Table of basis for admission 2008

Basis for Admission	EFTSL	Headcount
Higher education course (Australian or overseas equivalent)	19.6	30
Mature age special entry provisions	3.3	4
Not stated	1.8	3
Other basis	4.4	6
Professional qualification	3.2	4
Secondary education (Australian or overseas equivalent)	1.5	2
VET award course other than a secondary education course (Australian or overseas equivalent; complete or incomplete)	9.2	13

Source: Higher education statistics collection, DEEWR.

APPENDICES

APPENDIX A: EAST COAST GESTALT INC

History and Location

ECGI, founded in 1998, is a State Government accredited higher education institution that delivers its program on two campuses: Northern Rivers Gestalt Inc and Sydney Gestalt Institute. The institutes saw the benefits of a collaborative arrangement through the pooling of resources to deliver the Graduate Diploma of Gestalt Therapy. The ECGI Graduate Diploma of Gestalt Therapy was accredited in 2002 under the *Higher Education Act 2001* (NSW), and FEE-HELP was granted in mid 2005.

Academic Profile

ECGI is committed to the practice, promotion and development of Gestalt Psychotherapy. The Graduate Diploma of Gestalt Therapy has been developed over the years to its current form to provide specialist education in the Gestalt approach to working with people, and aims to produce competent, ethical and creative psychotherapists and practitioners. ECGI believes that one of the key strengths of this program is the experiential component whereby students are encouraged to develop their own Gestalt style. ECGI facilitates this by including 60 hours of supervised clinical practice over the final two years of the course.

East Coast Gestalt Inc embraces four guiding principles:

Practice

ECGI emphasises the constant application of theory through taking on both client and therapist roles.

Diversity

This includes diversity in the student community and diversity in faculty background and skills.

Community and Heart

ECGI regards every class as a community, and likens this to the heart of the group.

Educational Excellence

ECGI intends that students' learning experience will be substantial and their achievement will be recognised across the wider academic community.

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 institutes of higher education, and assisting in enhancing the academic quality of these institutes.

Objectives

AUQA is established to be the principal national quality assurance agency in higher education, with responsibility for quality audits of higher education institutes 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 institutes;
 - 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 institutes.
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 institutes, 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 institutes 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 institutes 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 institutes and agencies.
- *Open*: AUQA reports publicly and clearly on its findings in relation to institutes, 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 Jasen Burgess, Audit Director, Australian Universities Quality Agency

Emeritus Professor S. Vianne McLean AM, former Deputy Vice-Chancellor (Teaching Quality), Queensland University of Technology (Chair)

APPENDIX D: ABBREVIATIONS AND DEFINITIONS

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

AQF.....	Australian Qualifications Framework
AUQA.....	Australian Universities Quality Agency
BoG.....	Board of Governance
DEEWR.....	Australian Government Department of Education, Employment and Workplace Relations
DOT.....	Directors of Training (of Gestalt organisations)
ECGI	East Coast Gestalt Inc
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
GANZ	Gestalt Australia and New Zealand
HEI	higher education institution
HEP(s)	higher education provider(s)
HESA	<i>Higher Education Support Act 2003</i>
IGI	Illawarra Gestalt Institute
IT.....	information technology
MCEETYA	Ministerial Council on Education, Employment, Training and Youth Affairs (now disbanded)
MOU	Memorandum of Understanding
National Protocols.....	<i>National Protocols for Higher Education Approval Processes</i>
National Guidelines.....	<i>National Guidelines for Higher Education Approval Processes</i>
NRGI	Northern Rivers Gestalt Institute
NSWDET	New South Wales Department of Education and Training
NSA-HEP(s)	non self-accrediting higher education provider(s)
NSAI(s)	non self-accrediting institution(s)
PF p.....	Performance Portfolio page reference
Portfolio	Performance Portfolio
QAFs	Quality Audit Factors
SGI	Sydney Gestalt Institute
VET	vocational education and training

