

9 Dec 2016

Dr Michael Tomlinson
TEQSA GPO Box 1672
Melbourne, Victoria, 3001

Dear Michael

Re: Suggested Amendments to Guidance Note on Work-Integrated Learning (Beta v 1.0 at 19 August 2016)

This letter is in response to your emailed invitation for amendments to the Guidance Note. Its contents have been discussed and agreed amongst the ACED community, including the Associate Deans (Teaching and Learning) for Engineering, and members of ACED's Working Group on Engagement with Professional Practice. The response has been authorised by the ACED President.

We have provided suggestions that are effectively small (but very significant) additions changes to the wording of your Guidance Note as published. The bulk of our suggestions apply to the *'What will TEQSA look for'* section. We start with short comment and suggestions on the preceding sections.

What does work-integrated learning encompass?

The definition and scope of WIL used in the Guidance Note is narrower than used within engineering education and other disciplines, in so far as it refers to *'learning in a workplace outside of their higher education provider'*. This wording does not actually form part of the HES (2015); indeed in the ***Intent of the Standards*** section states that *'The Standards do not prescribe any particular type of model of WIL ...'*

ACED suggests that TEQSA adopt a broader definition of WIL for this Guidance Note, such as that in the TEQSA Glossary of Terms. This would be more consistent with educational practice and the National WIL which has been developed by Universities Australia and several industry peak bodies. This approach would enable the Guidance Note to cover placements in university research centres and implementation of 'virtual WIL', which are being used and developed successfully for engineering students.

Intent of the Standards

The HE Standards are about ensuring the quality of ***all*** learning experiences and the corresponding responsibilities of the educational provider.

Given the lack of focus on WIL in the Standards (see above), this section would be clearer if it was retitled ***'Intent of the Standards for the Implementation of WIL'***. Our opinion is that the intent of the first paragraph of this section would be more naturally placed much later in the section.

Risks to Quality

As stated, the nature and potential impact of the risks are ‘*highly contextual*’, and the examples of typical risks can be applied to any educational activity involving external agencies or individuals (the broader definition of WIL).

Nevertheless, some of the risks listed may be features of the operating environment and be part of the students’ learning experience. For example, as ACED pointed out in its earlier response, engineering activities and workplaces are very diverse, and specific outcomes from student placements will effectively be individualised, within a set of target outcomes. (A best-practice provider would then exploit this diversity for enhancing the learning of a whole cohort.)

ACED suggests an additional sentence before the list is introduced, such as: ‘*A provider of WIL activities must assess and mitigate in course and unit design and implementation, potential risks to the educational integrity, student experience, and reputation of the provider and partner.*’

What TEQSA will look for

Para 1: Is most relevant to placements that are required for professional accreditation. The provider must express these in its course requirements, and provide adequate guidance and support systems where students are required to be proactive in obtaining their placement. (Negotiation is often a legitimate learning outcome of a WIL placement.) A more inclusive expression of the range of professional accreditation practices that places the onus on the provider to see its course requirements satisfied would be:

‘Where course requirements include completion of a specific element of WIL (such as a placement) that is related to professional accreditation, such requirements must be made clear to prospective students in the representations made by the provider or its agents. It must be possible for all students (including overseas students) recruited into the course to access the element of WIL or have alternative arrangements that will meet the course requirements and those of the professional body. Where students are required to be proactive in the acquisition of a WIL placement, the provider must also provide adequate guidance and support. Such WIL course requirements may be whole or part course units for which course credit is gained, or may be a milestone requirement(s) to be met prior to qualification for progression or graduation.’

Para 2: No change suggested

Para 3: Engineering students go into the engineering workplaces to be supervised by engineers, not academics. We expect engineering students to be supervised by professional engineers as part of the required partnership agreement. We would expect a student and their supervisor on a placement of longer than one month to be contacted by the provider at least monthly. Electronic contact would be acceptable, and this would extend to students on overseas placements. This could be accommodated in the following rewording:

‘Arrangements for WIL will be expected to be formalised in an agreement setting out the expectations of the parties involved and the outcomes sought for students. The provider’s monitoring processes will be expected to demonstrate compliance with the agreement, which should include provision for

periodic on-site or electronic contact with a student in the workplace and their supervisor. Workplace-based staff involved with supervision of a student's WIL activities will need to meet the HES Framework Standards on Staffing (Standard 3.2.4) or have equivalent standing within their profession. TEQSA will want to see that feedback on student's experiences has been obtained and has been (or will be) used to improve the provider's approach to WIL.'

Para 4: No change suggested.

Para 5: The reference to WIL and prior learning could be clearer. For the field of engineering, a common case is a mature (usually part-time) student employed in an engineering role claiming exemption from a WIL placement requirement. This would normally be granted after positive evaluation of a detailed submission by the student on the scope of their work experience. Granting exemption for a specific course unit (not otherwise provided by WIL) would be rare. A suggested rewording of this sentence is:

'If a student's work experience is used as a means of granting credit for prior learning, a provider will need to show that it is meeting the requirements of the relevant Standards (see Section 1.2).'

Para 6: About one third of our engineering students are overseas students (in Australia or at overseas campuses). Australian students may undertake WIL placements overseas. The following rewording would cover these cases:

'WIL placements and internships undertaken in Australia must be consistent with the guidance available from Fair Work Australia. For students on overseas placements, workplace arrangements must be in conformance with local employment and workplace legislation, including safety.'

We hope you find these suggestions to be useful, as you develop this Guidance Note further. I and other ACED officers would be pleased to respond further on this important matter.

Yours sincerely



Professor Robin King, FTSE

Consultant to ACED
Emeritus Professor, University of South Australia
Adjunct Professor, University of Technology Sydney
E: robin.king@uts.edu.au
T: 02 9868 3113
M: 0418 823 415