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Assurance of Learning
in the Age of AI:
Strengthening
quality, equity and
trust through
connected assurance

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Assurance of Learning in the Age of AI: Strengthening quality, equity and trust through connected assurance

OES Positioning Paper // March 2026

Assurance of learning sits at the intersection of quality, equity and trust in Australian higher education. As artificial intelligence reshapes assessment and academic judgement, the challenge for universities and regulators is no longer simply preventing misconduct, but credibly evidencing learning across diverse delivery contexts and student cohorts.

OES brings a practice-informed perspective to this conversation, grounded in more than a decade of partnership with Australian and international universities to design, deliver and support large-scale, credentialled online and digitally enabled programs that lead to career outcomes. Through this work, OES supports learning and assessment across hundreds of programs and tens of thousands of students annually, many of whom are studying at a distance, balancing work and caring responsibilities, or participating through non-traditional pathways.

This paper sets out OES' position on why assurance of learning must now be approached as a connected, program-level design challenge, not just a modality-based or detection-led exercise. Drawing on regulatory intent, sector practice and sustained experience operating at scale with contemporary student cohorts in digitally mediated environments, we explore what is at stake for institutions and the system as a whole and how design-led, relationally supported approaches can strengthen confidence in outcomes while preserving flexibility and access.

OES offers this paper as a contribution to ongoing sector dialogue and stands ready to work collaboratively with universities, regulators and partners to guide this next phase of implementation.

Executive summary

Purpose and context

Assurance of learning sits at the intersection of quality, equity and public trust in Australian higher education. As artificial intelligence reshapes assessment practices, academic judgement and student engagement, the central challenge facing universities and regulators is no longer simply preventing misconduct but credibly evidencing learning across diverse delivery contexts and student cohorts.

This positioning paper sets out OES' perspective on how assurance of learning must evolve in response. Drawing on over a decade of experience partnering with Australian and international universities to design and deliver largescale, credentialled online and digitally enabled programs, OES argues that credible assurance in an AI-enabled environment depends on connected, program-level approaches rather than detection-led and modality-based controls.

Why this moment matters

Artificial intelligence has reframed assurance of learning as a design challenge rather than a policing problem. Confidence in outcomes depends less on isolated assessment artefacts or security measures, and more on the coherence of curriculum, assessment and teaching practices across an entire program of study. While identity verification and controlled assessment environments play a role, they are insufficient on their own to demonstrate that graduates have genuinely achieved the learning outcomes their qualifications claim.

This challenge coincides with growing reliance on flexible delivery, with around 44 per cent of Australian higher education students studying in external or multimodal modes in 2024. These models are critical for equity cohorts, particularly rural and remote learners, mature age students, students with disability and those balancing work and caring responsibilities.

What is at stake

Decisions made now will shape public trust in Australian qualifications over the coming decade. Fragmented, artefact-only or overly technical approaches to assurance weaken confidence in outcomes and risk prioritising compliance visibility over meaningful evidence of learning.

There is also significant equity risk. Responses to AI that default to narrow security controls or modality-based judgements may disproportionately disadvantage students who rely on flexible provision, including regional and remote learners and students with disability. At a system level, the challenge is to protect academic standards without constraining access while expanding participation in ways that sustain rigour and completion outcomes. Industry expectations must also be considered, particularly the growing demand for graduates who can understand, use and critically engage with AI in the workplace.

OES' Connected Assurance Framework

OES' position is that assurance of learning in the age of AI must be built around connected, program-level design. No single mechanism can provide sufficient assurance on its own. Instead, confidence depends on the intentional integration of three interdependent dimensions.

Relational assurance is built through sustained, meaningful engagement between educators and students, enabling informed academic judgement based on observation of learning over time rather than interpretation of isolated artefacts.

Technical assurance establishes appropriate conditions for assessment, including proportionate identity verification and, where required, controlled environments. These mechanisms enable confidence but do not constitute assurance on their own.

Pedagogical assurance focuses on curriculum and assessment design that generates cumulative, coherent evidence of learning across a degree, supporting progression, integration and triangulation of capability.

Together, these dimensions enable institutions to exercise confident academic judgement across diverse delivery contexts. In this framing, connection matters more than modality. The risks associated with AI do not map neatly to online or on-campus delivery, but to whether programs are deliberately designed to make learning visible, integrated and observable over time.

Regulatory alignment

The Connected Assurance Framework is aligned with the intent of the Higher Education Standards Framework and TEQSA's guidance on assessment reform in the age of artificial intelligence. It supports valid, evidence-based assurance while preserving flexibility in delivery and assessment, enabling regulators to see and trust program-level coherence rather than reliance on single point controls.

From position to practice

OES offers this paper as a contribution to sector dialogue at a time of rapid technological change and heightened scrutiny of assessment and assurance practices. We are actively piloting connected assurance

approaches with university partners and will continue to share insights, evidence and outcomes from this work as implementation progresses.

We invite universities, regulators, policymakers, peak bodies and partners who are working to balance quality, equity and trust to collaborate with us. This might look like coming together to share practice, testing the Connected Assurance Framework in your own settings, sharing emerging practice and lessons learnt through implementation. Given our student cohorts we are uniquely interested in strengthening assurance of learning while supporting rural and remote learners and underrepresented student cohorts.

Updates, insights and outcomes from this work will be shared at

// www.oes.edu.au/assuranceoflearning





A. Our starting point and why this moment matters

Our starting point is that credible assurance of learning in the age of artificial intelligence must depend on connected, program-level approaches that integrate pedagogical design, relational engagement between teachers and learners and appropriate technological support.

Credible assurance of learning should not depend solely on judgements about mode of delivery, detection-led compliance strategies, or isolated technical fixes applied at the level of individual assessment tasks.

This position reflects OES' experience working in partnership with Australian universities to support large-scale online and digitally enabled programs and aligns with the direction of recent sector guidance that emphasises the limits of assessment security and detection as proxies for learning assurance. It recognises that assurance of learning is not achieved through single events or tools, but through the accumulation and triangulation of evidence across a course of study, supported by intentional curriculum and assessment design.

Why this moment matters

Artificial intelligence has shifted the central assurance question facing higher education. The focus is no longer primarily on whether students are cheating, but on how institutions can generate credible, defensible evidence that graduates have genuinely achieved the learning outcomes their qualifications claim.

This shift reframes assurance of learning as a design problem rather than a policing problem. It requires universities to consider how assessment systems, curriculum structures and teaching practices work together across an entire program to support confident academic judgement. In this context, detection technologies and security measures play a role, but they are insufficient on their own.

At the same time, online and digitally enabled learning has come under increased scrutiny, with concerns raised about student identity, the use of generative AI tools and the integrity of assessment artefacts. While these concerns are legitimate, there is a growing risk of misdiagnosis. Many of the challenges attributed to fully online delivery are also present in on-campus and hybrid programs, where flipped classrooms, asynchronous learning activities, take-home assessments and limited face-to-face interaction are now commonplace too.

This moment also coincides with broader system-level reform pressures. The Australian Universities Accord sets ambitious participation and attainment targets that rely heavily on increased engagement from mature-age learners, students from regional and remote areas, first-in-family students and those balancing work, caring responsibilities, or disability. For these cohorts, flexible delivery is not a preference but a precondition for participation. Without high-quality, credible online and hybrid learning models, these national objectives will not be realised.

The challenge for the sector is therefore not simply to secure assessment in an AI-enabled environment, but to assure learning in ways that protect academic standards while enabling contemporary learning demands. Getting this balance right is essential to maintaining public trust in Australian qualifications, supporting equitable access to higher education and sustaining Australia's reputation for high-quality, student-centred provision.

B. What is at stake

The current debate about assurance of learning in the age of AI is not an abstract or technical one. Decisions made now will shape how Australian higher education balances quality, equity and credibility over the coming decade.

At stake first is public trust in qualifications. Education institutions must be able to warrant that graduates have achieved the learning outcomes their awards claim, regardless of delivery mode. In an AI-enabled environment, confidence depends less on individual assessment artefacts and more on whether institutions can demonstrate coherent, program-level evidence of learning that supports defensible academic judgement. Where assurance systems are perceived as fragmented, opaque or overly reliant on single-point controls, confidence in outcomes is weakened.

44% of students in 2024 studying in external or multi-modal modes

At stake also is equitable access to higher education. Fully online and digitally enabled programs now form a significant part of the Australian higher education system, with 44% of students in 2024 studying in external or multi-modal modes, reflecting the central role of flexible delivery in contemporary participation patterns.¹ These modes are particularly important for students who are underrepresented in traditional campus-based cohorts, including mature-age learners, regional and remote students, those with caring responsibilities, students with disability and learners balancing study with employment.

While publicly available national datasets do not yet readily disaggregate mode of study by equity cohort, government analysis explicitly recognises the access effects of flexible provision. The number of domestic commencing students with one or more self-reported disabilities increased from 39,829 in 2021 to 47,458 in 2024 (a 19.2% increase), with the Department of Education noting that this growth may reflect increased access associated with online and hybrid course options, alongside reduced barriers to disclosure and broader population trends.² These cohorts are central to meeting the national participation and attainment ambitions articulated through the Universities Accord.

Regulatory or institutional responses to AI that default to narrow security controls, including the use of testing centres as a primary mitigation strategy, risk undermining the flexibility that enables many students to participate. While such approaches are often adopted as a visible and scalable response to academic integrity concerns, they can shift risk rather than resolve it, focusing on containment rather than assessment and program design. For online and equity-cohort students, this has material access implications: 78% of our online equity students live more than 60 kilometres from campus, and location-bound or tightly invigilated assessment models can reduce flexibility around timing, introduce additional performance pressure, and create new barriers to participation and progression, weakening both equity objectives and completion outcomes.

78% of our online equity students live more than 60 kilometres from campus

1 Australian Government, Department of Education, *Selected Higher Education Statistics 2024 – Student Data* <https://www.education.gov.au/higher-education-statistics/student-data/selected-higher-education-statistics-2024-student-data>

2 Australian Government, Department of Education (2024), *Selected Higher Education Statistics 2024 – Student Data: Key Findings*. The Department notes that growth in students reporting disability may reflect increased access associated with the expansion of online and hybrid course options. <https://www.education.gov.au/higher-education-statistics/student-data/selected-higher-education-statistics-2024-student-data/key-findings-2024-higher-education-student-statistics>.



There is also a broader system risk of regulatory over-correction. TEQSA's recent guidance on assessment reform in the age of artificial intelligence has been clear in signalling a move away from detection-led approaches and towards more authentic, evidence-based demonstrations of learning, consistent with the intent of the Higher Education Standards Framework. This direction is widely supported across the sector and reflects a shared commitment to safeguarding quality and academic integrity into the future.³

However, if assurance of learning becomes equated in practice with modality-based judgements or singular technical solutions, institutions may be incentivised to prioritise compliance optics over meaningful evidence of student capability. Responses such as defaulting to invigilated, in-person exams risk narrowing innovation in assessment design and discouraging pedagogical approaches that enable students to demonstrate complex, applied capabilities in authentic ways.⁴

If assurance of learning becomes equated in practice with modality-based judgements or singular technical solutions, institutions may be incentivised to prioritise compliance optics over meaningful evidence of student capability

At a system level, what is at stake is the ability of Australian higher education to meet future workforce and participation needs without trading rigour for access, or access for rigour. Assurance frameworks that are overly restrictive may protect standards in theory, but fail in practice if they reduce participation, increase attrition, or disproportionately disadvantage students who rely on flexible modes of study to engage with higher education.

There is also a reputational dimension. Australia's higher education system has built a strong international reputation for combining robust regulation, institutional autonomy and sector-wide commitment to quality enhancement.

How the sector responds to AI-driven challenges in assurance of learning will signal whether Australia can continue to adapt thoughtfully and cohesively to change, reinforcing its competitive advantage in delivering high-quality, student-centred education at scale. Done well, this work builds on a longer legacy of Australian higher education leadership, including the development of a uniform and integrated qualifications framework, a student financing system that expanded access while sharing costs where private benefit accrues, the delivery of transnational education at scale, and strong international student consumer protections. Taken together, these foundations position Australia to convert regulatory credibility and educational quality into sustained reputational strength and international opportunity.

³ Since 2023, TEQSA has released a sequence of guidance materials addressing the implications of generative artificial intelligence for assessment and assurance of learning, including *Assessment Reform for the Age of Artificial Intelligence (2023)*, *Gen AI Strategies for Australian Higher Education: Emerging Practice (2024)* and *Enacting Assessment Reform in a Time of Artificial Intelligence (2025)*. Taken together, these publications signal a shift away from detection-led responses and towards program-level, design-led approaches that support valid, trustworthy evidence of learning in alignment with the Higher Education Standards Framework (Threshold Standards) 2021. This document is intended to align with that direction and contribute practical insight into how such intent may be operationalised across diverse delivery contexts.

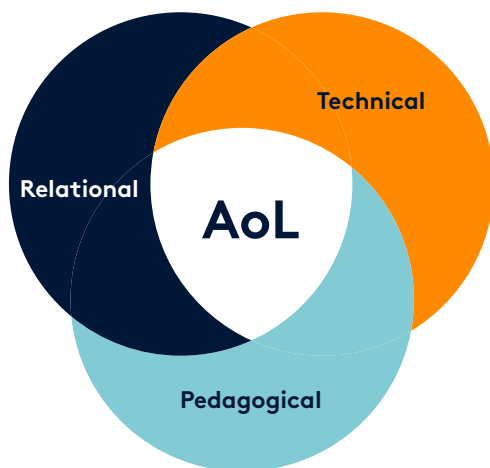
⁴ Dollinger, M., Bassett, M. A., Dawson, P., Ellis, C., Fawns, T., Liu, D., Lodge, J., Marrington, J., McCluskey, T., Mirriahi, N., Murdoch, K., Tindale, J., & White, A. (2025). *Assurance of learning in fully online credentialled programs: A briefing paper for the Australian higher education sector*. Curtin University. <https://hdl.handle.net/20.500.11937/99021>

C. OES' position

OES' position is grounded in the view that Australia's higher education system has a structural advantage in responding to the assurance of learning challenges posed by artificial intelligence. A strong national regulatory framework, a shared commitment to quality enhancement and a history of sector-wide collaboration and innovation provide a foundation for coherent, future-focused reform. The question is not whether assurance standards should be strengthened, but how this can be done in ways that are credible, scalable and equitable across diverse delivery contexts.

Within this context, OES is operationalising a Connected Assurance Framework, built across three interdependent dimensions: relational, technical, and pedagogical. This framework reflects both TEQSA's stated intent and emerging sector consensus that assurance of learning must be program-level, evidence-based and grounded in design rather than detection of misconduct. It is also aligned with the principles set out in the *Australian Framework for Artificial Intelligence in Higher Education* (2025), which emphasises human-centred education design, institutional responsibility and the integration of AI into learning and assessment in ways that enhance, rather than undermine educational quality.

A connected framework for assurance



The Connected Assurance Framework recognises that no single mechanism is sufficient to assure learning in an AI-enabled environment. Instead, credible assurance depends on the intentional integration of multiple elements across a course of study.

- **Relational assurance** emphasises the role of sustained, meaningful interaction between educators and students. Through structured synchronous engagement, dialogue and observation of student thinking over time, educators are better positioned to exercise confident academic judgement. Relational knowledge strengthens assurance by making students' learning processes visible, not just their submitted artefacts.
- **Technical assurance** focuses on establishing appropriate conditions for assessment, including student identity verification and controlled assessment environments where required. These mechanisms are necessary to support confidence in evidence but are understood as enabling conditions rather than ends in themselves.
- **Pedagogical assurance** centres on program-level curriculum and assessment design that generates coherent, cumulative evidence of learning. This includes scaffolded assessment across a degree, alignment between learning outcomes and assessment tasks and deliberate opportunities for students to demonstrate integrated capability rather than isolated performance.

These three dimensions are mutually reinforcing. Overemphasising one at the expense of others weakens assurance overall. When designed to work together, however, they enable institutions to build a defensible body of evidence that supports credible judgements about graduate capability.



Why connection matters more than study modality

OES' position is that connection matters more than modality. The risks associated with AI do not map neatly onto categories such as online, on-campus, or hybrid delivery. In practice, all contemporary programs rely to varying degrees on digital platforms, asynchronous learning activities and take-home assessment tasks.

What distinguishes lower and higher-risk approaches to assurance is not where learning occurs, but whether programs are deliberately designed to generate observable, trustworthy evidence of learning over time. Approaches that rely on siloed units, isolated assessment events, or singular verification mechanisms are increasingly fragile, regardless of delivery mode.

Programs are deliberately designed to generate observable, trustworthy evidence of learning over time.

By contrast, connected, program-level approaches enable institutions to triangulate evidence, identify discontinuities and exercise judgement with greater confidence. This aligns with TEQSA's emphasis on holistic assurance and with internationally recognised best practice in complex learning environments.

Cumulative assurance as both integrity and student experience

A further element of OES' position is that assurance of learning must be cumulative rather than unit-bound. Assurance strengthens when evidence is built progressively across a degree, allowing educators and institutions to observe development, integration and application of learning outcomes.

This cumulative approach serves both integrity and student experience objectives. From an assurance perspective, it reduces reliance on single-point assessments and supports more robust judgement. From a student perspective, it clarifies expectations, supports coherence across subjects and enables learning to be demonstrated in ways that are meaningful and authentic.

In an AI-enabled environment, where individual artefacts are increasingly difficult to interpret in isolation, cumulative assurance provides a more resilient foundation for confidence in outcomes.

A system contribution, not a prescriptive model

OES does not present the Connected Assurance Framework as a prescriptive solution or a replacement for institutional autonomy. Rather, it is offered as a practical articulation of how existing regulatory intent can be operationalised, informed by experience working at scale with university partners and aligned with sector guidance.

By framing assurance as a connected, program-level endeavour, OES seeks to contribute to a broader system conversation about how Australia can continue to deliver high-quality, student-centred education with integrity and confidence, even as the technological and policy landscape continues to evolve.

High-quality, student-centred education with integrity and confidence

D. Addressing known critiques

Any discussion of assurance of learning in the age of artificial intelligence must engage directly with the concerns that have prompted heightened scrutiny of assessment practices, particularly in digitally mediated and online contexts. These concerns are legitimate and widely shared across the sector. The challenge is not whether they should be addressed, but how they are interpreted and responded to.

Online delivery as “inherently riskier”

A common critique is that online delivery is inherently higher risk for academic integrity and assurance of learning. This view is understandable, particularly where assurance has historically relied on supervised examinations or physical presence as proxies for confidence.

However, this framing increasingly misrepresents how contemporary higher education operates. Many on-campus and hybrid programs now rely on take-home assessments, asynchronous activities, digital collaboration and limited face-to-face contact. In this context, risk does not align neatly with delivery mode, but with the design of assessment systems and the visibility they provide into student learning.

From an assurance perspective, the relevant question is not where learning occurs, but whether programs are designed to generate sufficient, coherent and triangulated evidence of learning over time. This includes the conditions under which learning is delivered: the learning environment, teaching approach, expectations placed on staff and students, and the integration of assessment within the curriculum. Program-level approaches that intentionally design these conditions, and that connect multiple forms of engagement and assessment, can in practice provide stronger and more continuous assurance than reliance on isolated, high-stakes events, regardless of modality. Online delivery models supported by connected assurance frameworks can reduce risk by increasing transparency, coherence and visibility across the full learning journey.

Deep fakes, identity and verification

Advances in generative AI have intensified concerns about student identity, impersonation and the authenticity of submitted work. These risks are real and require appropriate technical and procedural responses.

At the same time, identity verification and secure assessment environments should be understood as enabling conditions, not substitutes for assurance of learning. Verification can establish who is participating in an assessment moment, but it cannot, on its own, demonstrate what a student knows, understands, or can do across a program of study.

Connected approaches to assurance strengthen confidence by combining verification mechanisms (like those seen in banking and government contexts) with ongoing relational engagement, such as synchronous interactions, iterative feedback and observation of student reasoning over time. In this way, identity assurance is embedded within a broader evidentiary framework rather than treated as a stand-alone solution.

Authenticity versus security

Another recurring tension is framed as a choice between authentic assessment and secure assessment. In practice, this is a false dichotomy, reflecting a more limited view of validity that equates confidence with control rather than with the quality and coherence of evidence generated through assessment design. This framing aligns with recent work on assessment validity in AI-enabled contexts, which emphasises the quality and coherence of evidence over reliance on security controls alone.⁵

Highly controlled assessment environments may reduce certain risks, but they can also limit students' ability to demonstrate complex, applied capabilities in ways that reflect real-world practice. Conversely, authentic tasks that mirror professional contexts can raise questions about attribution if not supported by appropriate design and engagement.

5 See: Dawson, P., Bearman, M., Dollinger, M., & Boud, D. (2024). Validity matters more than cheating. *Assessment & Evaluation in Higher Education*, 49(7), 1005–1016. <https://doi.org/10.1080/02602938.2024.2386662>

A connected assurance approach recognises that authenticity and security must be designed together. This involves combining assessment tasks that allow for application and synthesis with structured opportunities for dialogue, reflection and demonstration that support confident academic judgement. When authenticity is supported by relational and program-level evidence, security concerns are mitigated rather than amplified. This does not require identity verification at every point of engagement; rather, confidence is built through proportionate, well-placed verification combined with cumulative evidence across the program.

The limits of detection-led and artefact-only approaches

Detection technologies and artefact analysis have an increasingly limited role in an AI-enabled environment. As generative tools become more sophisticated and widely accessible, reliance on post hoc detection of misconduct becomes less reliable and more resource-intensive, while offering diminishing assurance value.

More fundamentally, artefact-only approaches struggle to capture learning in complex domains, where capability is demonstrated through progression, integration and application rather than discrete outputs. Overreliance on such approaches risks shifting institutional effort towards managing appearances of compliance rather than strengthening the underlying quality of learning and assessment.

Connected, program-level assurance offers a more resilient alternative by focusing on patterns of evidence across time, supported by educator judgement and design-led assurance mechanisms.

Reframing critique as a design challenge

Taken together, these critiques point not to the unsuitability of particular delivery modes, but to the need for more intentional design of assurance systems. AI has exposed the fragility of approaches that rely on singular controls or assumptions about assessment context. It has also created an opportunity to rethink assurance in ways that are more aligned with contemporary learning, equity objectives and regulatory intent.

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By addressing these critiques through connected, program-level design, institutions can strengthen confidence in outcomes while preserving the flexibility and innovation required to meet future educational and workforce needs.



E. Regulatory Alignment

OES' position on assurance of learning is deliberately aligned with the intent of Australia's regulatory framework, particularly the Higher Education Standards Framework (Threshold Standards) and TEQSA's recent guidance on assessment reform in the age of artificial intelligence. This alignment reflects a shared objective: to safeguard academic standards while enabling institutions to respond thoughtfully to contemporary learning environments.

Alignment with TEQSA intent

TEQSA's advice has consistently emphasised that credible assurance of learning depends on valid assessment design, academic judgement and the availability of trustworthy evidence, rather than on detection technologies or narrow compliance mechanisms alone. This guidance recognises that AI challenges cannot be resolved through post-hoc policing and instead require more deliberate approaches to assessment and curriculum design.

The Connected Assurance Framework aligns with this intent by focusing on how institutions can generate coherent, program-level evidence of learning that supports confident academic judgement. It treats assurance as an outcome of design and practice, rather than as an overlay applied after the fact.

Supporting the Higher Education Standards Framework in practice

The Higher Education Standards Framework establishes clear expectations around learning outcomes, assessment validity, student support and academic integrity. While these standards are intentionally principles-based, institutions often face challenges in translating them into operationally robust assurance models, particularly in digitally enabled and flexible delivery contexts.

Connected, program-level approaches help bridge this gap by:

- strengthening alignment between learning outcomes, assessment tasks and evidence of achievement;
- reducing reliance on isolated assessment events as proxies for capability;
- and supporting consistent academic judgement across programs and cohorts.

In doing so, they assist institutions to demonstrate compliance with the Framework in ways that are defensible, transparent and educationally meaningful.



What connected assurance enables regulators to see and trust

From a regulatory perspective, confidence in assurance is strengthened when institutions can demonstrate:

- intentional program-level design;
- clear articulation of how learning outcomes are evidenced over time;
- and mechanisms that support academic judgement beyond individual artefacts.

Connected assurance approaches make these elements more visible. Rather than relying on episodic checks or singular controls, they enable institutions to present patterns of evidence that show how learning is supported, assessed and verified across a course of study.

This visibility supports constructive regulatory engagement by shifting conversations from questions of isolated risk to questions of system coherence and design maturity.

Avoiding unintended regulatory consequences

A further advantage of connected assurance approaches is their capacity to support regulatory confidence without narrowing the modes through which learning can be credibly demonstrated. Where assurance is equated too closely with modality or specific assessment formats, there is a risk that well-intentioned regulatory responses inadvertently constrain flexibility and innovation.

Advantage of connected assurance approaches is their capacity to support regulatory confidence without narrowing the modes through which learning can be credibly demonstrated.

By contrast, design-led, program-level assurance models allow institutions to meet regulatory expectations while continuing to serve diverse student cohorts through flexible delivery. This supports both quality and equity objectives, consistent with broader national reform agendas.

A shared commitment to future-focused quality

OES' position reflects a broader commitment to working alongside regulators, institutions and partners to strengthen assurance of learning into the future. Australia's regulatory architecture, characterised by clear standards, sector engagement and institutional autonomy, is an international asset. Leveraging this architecture effectively requires approaches that are both principled and practical.

By aligning connected assurance approaches with TEQSA intent, the Higher Education Standards Framework, and other sector responses, such as the *Australian Framework for Artificial Intelligence in Higher Education* (2025) OES seeks to contribute to a cohesive, system-level response to AI-driven change that reinforces confidence in Australian higher education, both domestically and internationally.

F. What this means for the sector

The implications of connected, program-level assurance extend beyond individual assessment practices. They require coordinated attention to design, capability and collaboration across the higher education system.

Implications for universities

For universities, the shift towards connected assurance highlights the importance of program-level responsibility for learning outcomes. Assurance is strengthened when curricula are intentionally designed to generate cumulative evidence of learning across a degree, rather than relying on isolated units or assessment events to carry disproportionate assurance weight.

This places renewed emphasis on:

- program coherence and alignment between learning outcomes, assessment and graduate capabilities;
- the role of educators in exercising informed academic judgement, supported by appropriate structures and evidence;
- and institutional approaches to assessment design that balance integrity, authenticity and flexibility.

It also underscores the need to invest in higher education staff capability, including assessment literacy and confidence in navigating AI-enabled learning environments. In this context, workforce development is not ancillary to assurance of learning, but a central enabling factor.

Implications for partners

For partners supporting universities at scale, connected assurance approaches reinforce the importance of alignment between delivery models, learning design and assurance expectations. Partners play a role not simply in providing platforms or services, but in supporting the conditions under which credible evidence of learning can be generated and interpreted.

This includes:

- designing learning environments that support sustained engagement;
- enabling visibility of learning progression across programs; and
- working collaboratively with institutions to ensure assurance mechanisms are embedded, not bolted on.

In this sense, assurance of learning becomes a shared endeavour, shaped through partnership rather than delegated through contract.

The case for collaboration

A recurring theme across regulatory guidance and sector discussion is that assurance challenges posed by AI are systemic rather than institution-specific. While institutional autonomy remains critical, fragmented responses risk duplicating effort, increasing cost and producing uneven outcomes.

Connected assurance approaches benefit from collaboration across institutions, partners and regulators, including shared understanding of risk, common design principles and collective learning from practice. Such collaboration supports consistency without standardisation and confidence without rigidity.

Assurance as a system responsibility

Taken together, these implications point to assurance of learning as a shared system responsibility, rather than an issue to be resolved solely through individual institutional compliance. AI has exposed the limits of approaches that treat assurance as episodic, reactive, or primarily technical.

By contrast, system-level commitment to connected, design-led assurance supports:

- more resilient responses to technological change;
- greater confidence in outcomes across diverse delivery contexts;
- and alignment between quality, equity and participation objectives.

This framing does not diminish institutional accountability. Rather, it recognises that confidence in Australian higher education is built through collective capability and coherence, supported by a strong regulatory framework and informed by practice.

Assurance of learning as a shared system responsibility, rather than an issue to be resolved solely through individual institutional compliance.

G. An invitation

This paper is offered as a contribution to sector sensemaking at a time when assurance of learning is under renewed scrutiny and rapid change. It seeks to articulate how existing regulatory intent, sector practice and emerging delivery models can be brought together in ways that strengthen confidence in outcomes while preserving flexibility, equity and innovation.

It's not intended to prescribe a single model for assurance of learning, nor to set standards for the sector. Australia's higher education system is diverse by design and institutional autonomy remains a core strength. Effective responses to AI-enabled change will necessarily vary by discipline, cohort and institutional context.

OES' perspective is grounded in experience working alongside universities to support large-scale, digitally enabled programs and in engagement with evolving regulatory and policy conversations. From this vantage point, assurance of learning is most resilient when it is treated as a design-led, program-level endeavour, supported by relational engagement and appropriate technical infrastructure, rather than as a compliance exercise focused on individual artefacts or delivery modes.

The challenges posed by AI are not unique to any one institution or provider. They raise shared questions about evidence, judgement and trust that are best addressed through collective dialogue and learning, informed by practice and aligned with regulatory expectations. Australia's cohesive regulatory framework and tradition of sector engagement provide a strong foundation for this kind of collaborative response.

OES welcomes ongoing conversation with universities, regulators, policymakers and partners about how assurance of learning can continue to evolve in ways that are credible, equitable and meet the needs of the modern learner. By engaging openly with these questions, the sector can reinforce confidence in Australian qualifications and ensure that higher education remains responsive to the needs of students, communities and the nation.



About OES

OES works in long-term partnership with universities and industry partners to design, deliver and support large-scale, credentialled online and digitally enabled higher education programs. Founded in 2011, OES has spent more than a decade operating at the intersection of learning design, academic practice, technology and regulatory expectations, supporting universities to extend access while sustaining confidence in academic outcomes.

Through its partnerships, OES has supported over 112,000 students globally and contributed to the delivery of 12,000+ units across undergraduate, vocational and short course offerings. This work spans a wide range of disciplines, qualification levels and institutional context. It also includes extensive experience working with equity cohorts and geographically dispersed learners, where assurance of learning must be achieved without defaulting to narrow, location-bound or detection-led approaches.

OES' work involves sustained engagement with program-level curriculum and assessment design, educator–student interaction at scale, and the development of cumulative evidence of learning over time. This practical experience is supported by a global workforce of over 1,800 staff operating across Australia, South Africa, the UK and the USA. It underpins our contribution to sector discussions on assurance of learning in the context of artificial intelligence, particularly where questions of validity, equity and confidence intersect.

Acknowledgements

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The background is a solid dark blue. It features four orange circles of varying sizes. One large circle is on the left, partially cut off by the edge. A medium-sized circle is in the lower right. A smaller circle is at the bottom right. A fourth, very small circle is at the bottom right, near the bottom edge.

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