

11 April 2013

Office of the Deputy Vice-Chancellor
(Academic)

Higher Education Standards Panel Executive
GPO Box 1672
Melbourne VIC 3001

Dear Emeritus Professor Robson

UQ response to Higher Education Standards Panel Call for Comment (Number 1, March 2013)

Thank you for the opportunity to provide comment on the Higher Education Standards Panel's approach to revising the current higher education Threshold Standards.

Format of the draft standards

Q1. Do you broadly support the proposed format for the standards? If not, why?

UQ supports the proposed format for the standards. The standards are sufficiently high level and the draft standards indicate an appropriate grouping.

In particular, we support the removal of repetition through the development of the standards taxonomy. This organisation makes it more accessible to users and appears to facilitate the clarification of responsibility at various organisational levels.

The revised format for the standards is more user-friendly and conducive for higher education providers (providers) to incorporate into current systems. The improved organising framework would also be of benefit to providers as it allows compliance mapping to be undertaken through specific key areas that are clearly identified. Additionally, this approach would make it easier for provider staff to identify standards relevant to their work (e.g. for a research staff member to ensure compliance with Threshold Standards relating to research or an academic staff member to identify Threshold Standard requirements for the design of a new course).

It is acknowledged that the organising framework is still in development and requires further refinement. In developing a communication strategy for UQ staff, an exercise was undertaken to identify key thematic areas within the threshold standards for targeted information provision. In mapping these key thematic areas to the proposed organising framework there was strong alignment in some areas but not all. UQ would be interested in providing comment on the proposed organising framework when released.

Q2. Do you support the inclusion of Reference Points as proposed? If not, why?

Yes. The addition of reference points makes the new proposed standards complete in that the standards are 'stand alone' and all requirements are clearly identifiable in these minimum standards.

The incorporation of authoritative material as Reference Points is handled in a balanced way and in particular presents a sensible approach to manage the relationship between Higher Education Standards framework and AQF.

This approach is likely to provide sufficient commonality to support cross-institutional collaborations and benchmarking but the avoidance of their inclusion as prescribed or specific content provides appropriate flexibility for both institutions and for external regulators to revise the Reference Points as appropriate.

The inclusion of "requirements for professional accreditation" as reference points for Learning Outcomes statements may be seen to privilege professional bodies whose requirements may not always be consistent with good practice in the development or assessment of learning outcomes. There is a need to refine the wording that suggests them as examples rather than as mandated inclusions.

I also wish to flag an issue for the review of future draft standards. In the current standards, it appears that an equivalent amount of information must be provided to potential and existing students. In the new taxonomy proposed by the Panel, information for prospective students sits separately under 'Representation' which is more aligned with current UQ practices and more appropriate.

Q3. Do you wish to make any suggestions in relation to the format of the standards?

UQ supports the proposed approach for the standards as simple and effective. The language is, on the whole, clear and accessible.

Course Design (Coursework)

Q4. Do you broadly support the proposed standards for Course design? If not, why?

The proposed standards are comprehensive and clear without descending into a level of detail that promotes a perfunctory compliance culture rather than trusting institutions to interpret and implement the general spirit or intent of the standards.

Q5. Do you wish to make any suggestions in relation to the specific content of the standards?

Cross-referencing to the Learning Outcomes standards would be useful. This could take the form of "5(d) is aligned with the Course Learning Outcomes". While UQ appreciates the need to avoid repetition, we consider it more important to also realise that different groups may look at particular standards in isolation and may therefore need their attention drawn to complementary sets relevant to the deliberations. We believe that this minimal cross-referencing is necessary to ensure that learning outcomes explicitly inform course design.

It is suggested there be an addition of a standard related to teaching that parallels the wording of Standard 5 (which refers to course content) or explicitly cross-reference the set of standards to be developed for the teaching component of the "HE Functions" element of the (revised) standards framework.

It is noted that Course Design standards 1, 2 and 4 ascribe an ultimate level of responsibility for compliance which could be interpreted as superimposing a hierarchical status on specific standards.

Learning Outcomes (Coursework)

Q6. Do you broadly support the proposed standards for Learning Outcomes? If not, why?

UQ supports the proposed standards and agrees they are comprehensive, clear and indicative of expectations while remaining manageable in number.

Draft standard 6 requires some clarification and may be potentially difficult.

6. *Each course of study is designed to enable equivalent student learning outcomes regardless of a student's place or mode of study.*

Is this standard implying that a provider should be able to design a program such that it can be delivered in multiple modes? There are some programs that may not ever be offered in external mode.

5. *The content of each course of study:*
 - a. *is drawn from current knowledge and scholarship in relevant academic disciplines*

While the standards include statements about knowing and knowledge, what about the doing? Good program design increasingly recognises the need to include 'practice' as a significant component of higher education. This approach derives from frameworks that say education and learning in universities can be considered in various ways, but typically there is a practical element. For instance, there is the 'knowing, acting, being' way of viewing learning.

Where is the 'acting and being' which is typically based on or drawn from current practice in the discipline whether it be history, philosophy or architecture? One would expect our programs can be linked to some form of 'practice' and standards need to include a statement that program and course design are about more than knowledge.

Demonstration of Standards 3 to 6 will require the University to update its current systems to enable mapping of course learning outcomes to 'discipline specific program outcomes'. While this is an internal issue for the University, there is significant development work to be done to demonstrate program outcomes on a publically accessible site in order to address requirements in the program-level standards.

10. *The grading of students' achievement of learning outcomes for selected units within courses of study is referenced periodically against the grading of students' achievement in comparable units or courses in other Australian institutions.*

The Go8 Quality Verification System or a similar system will also be essential given standard 10.

Q.7 Do you wish to make any suggestions in relation to the specific content of the standards?

UQ suggests adding "values" or a similar term to the list of outcome domains in 3(a), while recognising this issue has undoubtedly been thoroughly considered by the Panel.

Finally, consideration might be given to the need for a standard that requires active engagement of those with coordination and teaching responsibilities in relation to these standards. Sessional teachers are often excluded from conversations and deliberations regarding learning outcomes and standards and we are already detecting the development of compliance approaches that (with the best of intentions) are designed to protect coordinators and teaching staff from the administrative implications of demonstrable standards compliance. However, processes such as mapping learning outcomes and assessment which do not involve those who are implementing the standards risk perfunctory compliance at best and inadvertent deviation from documented intentions at worst. This could be a wonderful professional learning opportunity if the standards are implemented in the spirit in which they are written.

I feel compelled to add that the whole standards driven approach to higher education, at a time where knowledge is doubling every six months and technology is becoming a disruptive innovation, is more of an expensive distraction than a substantive intellectual gain. It fits uncomfortably with a self-accrediting, high performing university and one wonders whether we are on a race to the bottom – would you ask Stanford or Harvard whether they comply with the HE Standards? Nonetheless, I trust this submission is helpful and provides useful feedback to the Higher Education Standards Panel.

Yours sincerely

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