

12 April 2013

Higher Education Standards Panel Executive
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Call for Comment – Draft Standards for Course Design and Learning Outcomes

You have invited comment on proposed revisions to the current Higher Education Threshold Standards. I am responding on behalf of Flinders University.

The University endorses the Innovative Research Universities' group submission.

In addition, the University makes the following comments:

Q1 – 3

Flinders supports the proposed format of the draft Standards and the proposed use of Reference Points, noting the elaboration on Reference Points in the IRU submission.

Q4 – 5

Flinders supports the proposed standards for Course Design with the following comments:

- With regards to Standards 1, 2 and 7, processes for course approval and amendment are likely to vary considerably across institutions, but accountability for approving and monitoring these processes must necessarily rest in a formal, legal sense with the Provider's governing body. The governing body should delegate the initiation, oversight, review and amendment of courses to a subsidiary body or officer (in that way satisfying the current wording, with which Flinders is comfortable, about "academic governance arrangements that provide a clear and discernible separation between corporate and academic governance, including a properly constituted academic board and course advisory committees"). However, the governing body needs ultimately to be accountable for the establishment and monitoring of all quality assurance processes.
- Standard 3 clearly encompasses the areas to be addressed in course design.
- With regards to Standard 4, the Australian Qualifications Framework should continue to be explicitly identified as the reference point for course design. Some degree of interpretive flexibility in relation to the AQF is necessary, provided that specified learning outcomes can be assured of being met. However, the sector does not need a reversion to anything like the *status quo ante* with its toothless AQF, and hence Flinders would be concerned if the phrase "*informed by the Australian Qualifications Framework*" were intended, even if subliminally, to move in that direction. If significant deviation from strict AQF compliance (especially in terms of volume of learning) were to be explicitly or

implicitly permitted (and this appears to be the expectation in some institutions to deal with Masters courses in a few professional disciplines where strict compliance would be at variance with well-established disciplinary and international practice) then this should be vetted and clearly promulgated sector-wide. Institutions such as Flinders are taking substantial steps to ensure compliance with a robust interpretation of the AQF across all courses at all levels. If competitors do not do so, then compliant institutions would be an immediate competitive disadvantage. An incremental or piecemeal approach to the oversight of AQF compliance, limited to a sample of courses examined during occasional institutional registration processes, runs the risk of this kind of perverse outcome.

Q6 – 7

Flinders supports the proposed standards for Learning Outcomes with the following comments:

- As mentioned above, the AQF should continue to be the stated reference point for statements of learning outcomes.
- The University supports the requirement for formal reviews involving external benchmarking. The requirement could be set out in terms of a specified period, for example 5 – 7 yearly, but the principle is that the reviews should be frequent enough to ensure that the course design *and delivery* are appropriate and that externally benchmarkable outcomes are being achieved. Periodic external course reviews should also be complemented and informed by internal annual reviews based, for example, on consideration of student results and progression and attrition rates, and it may be valuable to include such a requirement explicitly in the Standards.

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