

**Response from the Council of Private Higher Education
to the
Draft Standards for Course Design and Learning Outcomes Discussion Paper**

These standards are essentially principles which should guide the operations of an effective higher education provider without inhibiting initiative, innovation or creativity.

COPHE appreciates the opportunity for consultation.

Please find our responses to your specific questions following:

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

The proposed format for the standards is workable and should provide overall guidance to HEPs, particularly the commitment to eliminating repetition. We also support anything that stops a bureaucratic, that is, “check box” mindset; so a narrative style is preferable to listing.

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

The Reference Points as so far proposed make sense in a general way, but even within a recognised discipline a distinction would need to be made between reference points for a core unit of study and an elective unit. This would relate to both the extent of the content and the value placed on enrichment work.

An example of the need for reference points is: LO Standard 2: “informed by international comparators”, which is vague and could generate a lot of work, or may require a simple response.

Where possible Reference Points should link back to the AQF, which provides adequate general guidelines and conditions for professional accreditation, and where appropriate, should specify these in the context of the discipline.

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

Is there any point in distinguishing between Course Design and the design of Units of Study within a Course? The former would seem to deal more with the learning outcomes for each AQF level, while the latter are concerned with the specification of the AQF in the development of content.

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

One could question whether they are “standards” or merely broad “criteria”. The latter checks whether the items have been addressed, whereas the former evaluates how well they have been addressed. They could become standards if more detailed and measurable points were listed under each standard, but this would destroy the neat simplicity of the currently proposed format.

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

A key ingredient is the integration of AQF levels, learning outcomes and assessment methods. If these are not clearly inter-related, then the implementation of a course, no matter how well designed,

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can be at the mercy of individual teachers. While in a sense this is always the case, clear specification of the integration of the above three components can be more readily controlled for quality.

We question the use of the verb in CD 4: “informed by the *Australian Qualifications Framework*”. Surely something stronger is required at that point; since there should be compatibility between the AQF and the Standards.

Given that these standards, in the case of non-self-accrediting providers, are key to course accreditation undertaken by the regulator and the accreditation will apply to a period of some years, it would be helpful to explicitly address the reality that courses may iterate as they are updated to reflect new and current scholarship.

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

The proposed “standards” for Learning Outcomes, particularly in 3 and 4, are the key to both teaching standards (process/delivery) and learning standards (output/outcome) which are distinct, but not separate: that is, if I have taught but the students have not learnt, then I have not taught.

Q7. Do you wish to make any suggestions in relation to the specific content of the standards?

A point that seems to be ignored in practice is the relativities among learning outcomes in achieving the AQF levels within the purpose of a particular course, particularly if it is occupying a niche within a discipline. For instance, two courses in the same field of study might have identical learning outcomes on paper, but the relative emphases on different outcomes can mean that the courses are actually different in practise. More simply: Learning Outcomes are often (perhaps usually) listed as though they are of equal importance in contributing to the attributes of the graduates of the course, but this is not actually true or a preferable thing.

3b and 3c seem to be repetitious. Skills are only assessed in terms of application. 3c is preferable wording in terms of relevance to the particular needs of the course in the context of the field of study, for example communication skills required of an IT engineer versus a communications graduate.

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*COPHE provides a voice for private higher education institutions calling for quality higher education policy for choice, diversity and fairness. Our members operate from more than 60 campuses around Australia.
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