



University of
South Australia

11 April 2013

Higher Education Standards Panel Executive
GPO Box 1672
Melbourne VIC 3001

Dear Higher Education Standards Panel Executive,

The University of South Australia values the opportunity to comment on the proposed revisions to the Higher Education Threshold Standards.

The University supports the Panel's approach to the proposed amendments to both the format and content of the draft Standards. Further detail on the requested call for comments is provided below.

Concept of Reference Points

1. Do you broadly support the proposed format for the Standards? If not, why?

The proposed format for the Standards is supported. This new approach makes the Standards more clear and focused, with less duplicated information.

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

The inclusion of Reference Points is valuable for providers. The Reference Points help providers to ensure that the correct information has been considered against the relevant Standard, and provides useful links to the source information for further detail.

In some instances it may be useful to broaden the types of Reference Points included, to expand the range of indicators that could be used, to help guide providers in meeting the Standards.

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

No.

Course Design (Coursework)

4. Do you broadly support the proposed Standards for Course Design? If not, why?

The proposed Standard for Course Design is clear, logical and encompasses the process of Course Design effectively.

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

Some suggested amendments to the content of the Course Design (Coursework) Standard include:

- Clause 2: Consideration should be given to whether this Clause should be located within the Course Design (Coursework) Standard, or as part of a future Standard that deals with academic governance.
- Clause 3: It may be difficult for providers to summarise all of this information for each course of study as this information is generally recorded at the unit-level. With many providers aiming to offer flexibility within their courses (particularly within courses with a large selection of electives) it may be difficult to specify each of the requested elements of Course Design (such as assessment and programmed student workload) for every course. It is suggested that Course Design also includes learning experiences (pedagogy), because Course Design encompasses alignment between objectives, assessment and learning experiences.

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- Clause 5: The Reference Points appear limited, given the strong relationship between disciplinary knowledge, research and scholarship, and could be expanded to include published outcomes from academic disciplinary communities and peak bodies.
- Clause 6: This Clause may need further clarification, such as to qualify 'place or mode of study' with examples such as local, regional, transnational, off-campus or online. It should also be clarified that 'equivalent student learning outcomes' would mean equivalence with another course of study within the same institution, rather than a course offered by another provider. Clause 6 should also be expanded to include equity/widening participation, such as to include 'regardless of a student's starting point or support provided by way of disability plan or other institutional support that there is an equivalent student learning outcome'.
- Clause 9: As per comments provided on Clause 2.

Learning Outcomes (Coursework)

6. Do you broadly support the proposed Standards for Learning Outcomes? If not, why?

The University supports the proposed Standard for Learning Outcomes, and notes that the Standard is comprehensive, and logical to follow.

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

The following suggestions are provided in relation to the content of the Learning Outcomes (Coursework) Standard:

- Clause 2: It may be useful to define Clause 2 in terms of the qualification 'level' awarded. As this Clause refers to 'international comparators' consideration could be given to the inclusion of international academic disciplinary communities and peak bodies to be included as a Reference Point.
- Clause 3: Consideration should be given to including Reference Point 2 within Clause 3, as such a key Reference Point in relation to learning outcomes.

Please contact me if you wish to discuss any of these comments further.

I look forward to examining the outcomes of this consultation phase, and reviewing the proposed organising framework and future blocks of draft Standards, as they are released by the Panel over the coming months.

Yours sincerely,

Professor Margaret Hicks
Director: Learning and Teaching Unit (on behalf of the Academic Portfolio)