



OFFICE OF THE VICE-CHANCELLOR

DEPUTY VICE-CHANCELLOR (EDUCATION)

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Higher Education Standards Panel Executive
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Dear Higher Education Standards Panel Executive

The University of Western Australia welcomes the opportunity to make this submission in response to the recent Call for Comment (Number 1, March 2013) Draft Standards for Course Design and Learning Outcomes.

The University notes that in respect of performance standards, it adheres to the following principles:

- the robust maintenance of minimum standards, without unnecessary intrusion upon institutional autonomy;
- avoiding duplication of the provision of data already made available to the government by the University in other contexts;
- clear definitions of intended purpose in any performance measurement exercise, supported by instruments that are fit for purpose, which use valid methodologies, and whose results are subject to nuanced, expert analysis;
- a focus upon measurable outcomes, informed by the relevant input and processes indicators and measures.

In this context, I would like to congratulate the panel on the draft Standards for Course Design and Learning Outcomes.

Overall the University supports the current directions that are flagged in the first Call for Comments as well as the planned consultation process. Also supported are the Panel's plans to provide an Organising Framework under which these draft standards will be located. While noting that this framework will also be shortly released as part of the consultation process, it was difficult to establish the completeness of the draft standards under the two sets, without knowing the companion standards that will sit with them. Because of this, no attempt will be made at this point to add any suggested standard statements until the full set of draft standards is available for this cross-referencing to be undertaken.

With specific reference to comments sought from the Panel

Call for Comments:

A: Feedback on the proposed format (e.g. style, clarity, pitch) for the revised standards (including the use of reference points), as represented by the two standards examples given.

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

The University of Western Australia is broadly supportive of the proposed format.

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

There are some concerns about the Reference Points and the role they will play in the assessment and determination of the Standards, particularly as they are currently linked to each set of standards.

- The first concern is that they are all external reference points. A valid and important reference point should also be the institution's own course design and graduate learning outcomes and its own internal reference points (which may be externally referenced).
- The second concern is that not all professional body's registration and accreditation processes are exemplary. If these become one of a few reference points, it may not be in the best interests of the course, the institution or the students learning.
- The third concern is that there are no current international reference points, yet a number of universities and their courses seek international accreditation and benchmarking.
- Finally, we note that given the less definitive nature of Reference Points, which are not expressed as standards, there may be a need for further clarification by the HESP over time as Reference Points become dated or in response to the ways that the Reference Points are operationalised by the Tertiary Education Quality and Standards Agency (TEQSA).

It is recognised that reference points may be useful as examples, but we suggest that they are not located under each set of standards, but perhaps grouped under broad categories, or under a common list of reference points for all the sets of standards.

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

The University congratulates the Panel on these statements which have been thoughtfully conceptualised. The format is considered appropriate and the University looks forward to the release of the full set of standards.

The timeframe for review for both sets of Standards is 'at least every 5 years'. This university carries out an extensive review process on a 7 year time frame, with regular review and changes being made more frequently when necessary. Given the size and complexity of this institution, the costs of a 5 year cycle instead of a 7 year cycle would be considerable. Where institutions carry out regular processes of review e.g. annual reports, course review, and other ongoing quality mechanisms, we would argue that a 7 year review timeline is appropriate

B: Feedback on the proposed draft standards for Course Design (Coursework)

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

The University broadly supports the proposed standards for course design. This support is made in the absence of the full set of standards so we may wish review the Course Design standards once these are available. For example, it is not clear where aspects related to teaching and learning are to be addressed in the Standards. These Course Design standards are largely structured around content and processes, while research informed teaching and learning approaches and practices are largely absent.

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

The university holds a range of views on the role of the AQF in the Standard statement Number 4. in response to these diverse views, we suggest the following--

The nature and scope of the course and the expectations for student learning are consistent with the qualification to be awarded.

It is not clear where Course Management will be dealt with in the Organising Framework. If it will not be picked up by other sets of Standards, then there will need to be a Standards statement related to Course Management under this set of Course Design standards

C: Feedback on the proposed draft standards for Learning Outcomes (Coursework)

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

The University broadly supports the proposed standards for Learning Outcomes (Coursework) with the exception detailed below. This support is made in the absence of the full set of standards so we may wish review the Learning Outcomes standards once these are available.

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

We share a concern with a number of others consulted on these draft standards that there is the possibility for confusion through the lack of distinction between the learning outcomes, defined as "what students know, understand and can do as a result of learning", compared with the learning outcomes required for the achievement of a qualification. In a course, students attain or achieve various learning outcomes to a greater or lesser degree, but it is the threshold standard that they must achieve that should not change. This point is consistent with distinction made in the DEEWR (2011) discussion paper:

Learning standards are best viewed as outcome standards. Learning standards describe the nature and levels of student attainment—what students and graduates know and can do...the explicit levels of attainment required of and achieved by students and graduates, individually and collectively, in defined areas of knowledge and skills.

It is appropriate and indeed desirable to recognise levels of learning achieved beyond the standard and it is common practice to recognise outcomes achieved well in excess of the standard by the various grades used by institutions. Indeed the achieved outcomes may well vary by types of provider. However, students must be required to achieve the course learning standards in order to graduate. Apart from calling the latter 'learning standards', there are various options for distinguishing these from learning outcomes attained. This includes: 'threshold learning outcomes', 'required learning outcomes', 'benchmark learning outcomes' or 'learning objectives'. We believe that by adding this distinction there will be less confusion. For example, Standard 8 would not need the 'specified' qualifier for learning outcomes if the term 'learning standards' had been used."

Standard 7: Consistent with our feedback to Question 6 above and the need to reduce potential confusion between learning outcomes achieved and learning standards required, we recommend replacing "Learning outcomes for each course" with Learning standards for each course". Without such a change, it could be interpreted as providers needing to benchmark achieved course learning outcomes every five years which is covered in Standard 10.

On the point of timelines raised above, while we recognize the need for regular reviews, particularly in relation to the learning standards and outcomes, we are concerned that the resource implications for this across a comprehensive institution such as a university, in addition to professional and accreditation reviews and regular reviews which despite best effects do not always occur together, "every five years" may be too frequent. We would endorse a time line "between 5-7 years".

We find number 6 is overly complicated by the addition of qualifiers and suggest that they be removed. i.e. *The assessment of student learning, ~~whether at the unit level, course level or in combination~~ encompasses all specified learning outcomes for each course of study*

Again, we are concerned that while there is reference to the institutional graduate attributes in a number of standard statements, this is not included as an overall reference point. The overall narrowness of the of the reference points remains a concern, particularly for this set of standards.

I trust that these comments may prove useful to the Panel, as it makes further progress in devising acceptable and robust standards for our sector.

Yours sincerely

Professor Alec Cameron