16 April 2013

Emeritus Professor Alan Robson
Chair, Higher Education Standards Panel

Dear Professor Robson,

Higher Education Standards Panel Call for Comment

Thank you for the opportunity to provide input in to the development of the higher education standards for Australia.

The University of Ballarat is pleased to submit the information below in response to the call for comment.

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

- We broadly support the proposed format – it is clearer and easier to use than the previous iteration to ‘check off’ the relevant aspects.
- We agree that this format will reduce overlap and repetition and increase consistency and clarity.

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

- We support the inclusion of Reference Points as proposed, with the following clarifications:
  - Links to the relevant documents in a central repository would help ensure there are no misunderstandings about the documents to which the Reference Points refer.
  - The AQF does not align with the Panel’s definition of Reference Points, which is: “The use of Reference Points is seen as a mechanism that gives some guidance to providers and regulators while not being prescriptive or seeking to standardise a provider’s approach to meeting the standards.” We would suggest that the AQF is more than ‘guidance’ and is quite prescriptive. Including it as a Reference Point, as defined above, needs rethinking.
- We would suggest, given comment below about students with disabilities, that the Panel give consideration to including Universal Design principles as an additional Reference Point for Course Design.
Q3. Do you wish to make any suggestions in relation to the format of the standards?

- We believe that the new format is of a higher standard than the previous format/document.

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

- We broadly support the proposed standards for Course design, with the exception of points made below.

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

- We would make the following suggestions:

**Number 6:**
- We suggest that the current wording: -

  ‘Each course of study is designed to enable equivalent student learning outcomes regardless of a student’s place or mode of study’ is ambiguous and should be changed to

  ‘Each course of study is designed to enable equivalent student learning outcomes regardless of a student’s location of study or the mode(s) of delivery employed’

**Number 7:**
- We would suggest combining this point with point Number 2 as they both relate to the role of the governing body in ensuring the quality of the course.

**Overall:**
- This set of standards statements makes no reference to ensuring course design that enables students with disabilities, language/cultural challenges and the like access and successful participation. We would suggest an additional statement along the lines of: -

  ‘Each course of study is designed to enable equivalent student learning outcomes regardless of a student’s individual circumstances, including disability and language and cultural impediments’. We would then add ‘Universal design principles’ to the Reference Points.

- The use of the generic term ‘learning outcomes’ can be confusing. The standards should probably better differentiate between Course/Program Learning Outcomes and Unit/Subject/Course Learning Outcomes.
Q 6. Do you broadly support the proposed standards for Learning Outcomes? If not, why?

- We broadly support the proposed standards for Learning Outcomes with the exceptions noted below under our response to Question 7.

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

Number 2:
- We seek clarification of the meaning of ‘informed international comparators’ and what evidence of this could be produced.
- We note that if ‘informed’ just means that have considered/looked at international comparators, then there appears to be little point in having this in the document. If it means more than that, more detail and clarification is required.

Number 3:
- We suggest that there should be some recognition that not all study should lead to employment in the field as there are many other valid reasons to study, including self-improvement and personal interest.
- We consider the dot points to be unnecessarily vague. One suggestion is to make the following changes:

  3a meet agreed learning outcomes for the discipline
  3b meet the institution’s graduate attributes
  3c meet the requirements of employment related to the field of study where applicable

- The dot points provided by the Panel address knowledge, skills, generic skills and the application of generic skills, but not the application of disciplinary/interdisciplinary knowledge and skills per se. Without the inclusion of the application of disciplinary/interdisciplinary knowledge and skills, this point is out of alignment with the AQF, which specifies such application.

Number 6 and Number 8:
- There is some risk of perceived overlap between these two points as they are open to various interpretations. While it might be argues that Number 6 refers to the alignment of assessment with outcomes and Number 8 is about validity (and reliability), alignment is one feature of validity. Perhaps some further clarification is necessary here.
- One suggestion is that the wording of Number 6 be changed to: -

‘The assessment of student learning encompasses all specified learning outcomes and is appropriate for the learning outcomes for each course of study’ and Number 8 is deleted.
Number 10:

- We have a number of concerns, specifically:
  - Issues of intellectual property around assessment tasks and content, particularly in a competitive environment
  - Issues of student privacy where de-identification of student work may not be achievable
  - the willingness of other institutions to participate in benchmarking exercises of this kind and the (lack of) ability of one institution to compel other universities to participate
  - the scale of this requirement and the resources required to undertake this work.

We look forward to continuing to work collaboratively with the panel to develop the standards further.

Yours sincerely,

Professor Todd Walker
Deputy Vice-Chancellor (Learning and Quality)