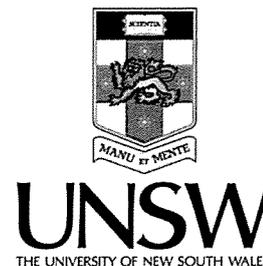


12<sup>th</sup> April 2013



Higher Education Standards Panel Executive  
GPO Box 1672  
Melbourne VIC 3001  
Via email [info@HEstandards.gov.au](mailto:info@HEstandards.gov.au)

Dear Professor Robson

**Response from the University of New South Wales Higher Education Standards Panel to the Call for Comments No. 1, March 2013, Draft Standards for Course Design and Learning Outcomes**

The University of New South Wales (UNSW) appreciates the opportunity to comment upon the two proposed sets of draft standards. Whilst our view is that the current drafts represent appreciable improvement on what went previously, we remain firmly opposed to the notion of national threshold standards dictating how a self-accrediting and high performing institution approaches the design of our academic programs.

This is not simply a response to the compliance demands that TEQSA is placing upon the sector but born from an evidence and analysis supported position that the reduction in institutional and sector autonomy that such systems create is associated with both a reduction in performance and in the ability to respond to local, national and global needs nimbly [references follow at the end of document]. It appears to us that the espoused political desire to see Australian Universities highly represented amongst the worlds leading institutions is fundamentally compromised by a legislative framework that will inevitably hinder this.

With this opening caveat, our detailed response to both the questions and to the individual standards follows.

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

The style and consistency of standards statements are an improvement on the current format. The use of headings rather than standards statements removes a level of unnecessary complexity and the proposed standards statements are more succinct.

It will be important that there is a very clear understanding of how such terms such as “informed by” and “consistent with” will be interpreted by those involved in evaluating submissions. It is our view that this must be a permissive use of these terms in order for Universities to best respond to institutional and stakeholder needs.

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

The reference points have been included to provide some guidance on how the standards might be interpreted, but the examples given do not in themselves provide this guidance. It would be useful to include some information on the context or further explanation on how the provider or TEQSA might use these reference points, and to understand the status of ‘a reference point’ relative to the standards and other reference points, particularly in relation to the AQF. For example, the two reference points for Course Design are the AQF and professional accreditation requirements. Where

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the requirements of each differ, the provider may potentially give more weighting to one reference point at the expense of the other.

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

The format is acceptable, but it would be useful to have a graphic of the framework illustrating the relationships between the standards.

**Course Design (Coursework)**

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

Yes.

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

We do not believe that standard 7 should include a specific time. This requirement will vary from course to course and does not need to be specified.

**Learning Outcomes (Coursework)**

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

We agree with the creation of a separate set of standards for Learning Outcomes.

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

We believe that international comparators (mentioned in Standard 2) be included as reference points. Increasingly we are collaborating with leading international institutions and it is naïve to assume that such partners would simply accept Australian reference points alone. Point 10 in the learning outcomes document is as currently written unworkable. What is a comparable unit? We also believe that the reference points should include the ability to reference against peer Universities globally

Having addressed the specific questions we make more detailed individual comments against each of the draft standards.

**Learning Outcomes (Coursework)**

1. *The learning outcomes to be achieved on completion of a course of study are specified for each course of study.*
  - Reasonable and straightforward
2. *The learning outcomes for each course of study are consistent with the qualification awarded, are comparable with those for courses of study that lead to the same or a similar qualification in Australia and are informed by international comparators.*
  - Reasonable and straightforward
  - An important inclusion is the reference to being “informed by international comparators”
3. *The learning outcomes for each course of study are informed by:*
  - a) *the mastery of specific disciplinary and/or interdisciplinary knowledge and skills that characterise the field of study*
  - b) *the generic skills and attributes required of graduates*
  - c) *the application of generic skills and attributes in the context of the field of study including the communication skills required, and*

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- d) *the requirements of employment related to the field of study.*
- Good coverage of the key domains of learning outcomes and clearly stipulated
  - The use of “informed by” does provide an indication that not all learning outcomes will have to be addressed in every course
4. *The relationship between the overall learning outcomes for each course of study and the learning outcomes for units that contribute to the course of study is demonstrable.*
- Reasonable and straightforward
5. *The specified learning outcomes for each course of study are available to the staff and students who are involved and are publically accessible in a current version.*
- Reasonable to require the learning outcomes to be available to staff and students
  - However, there could be issues with having course documents and information being “publically available”. It is recommended that the words “readily available” be used instead.
6. *The assessment of student learning, whether at unit level, course level, or in combination, encompasses all specified learning outcomes for each course of study.*
- Whilst it could be expected that all learning outcomes would be linked to the assessment of learning in the unit or course, it is sometimes not possible to encompass or address all specified learning outcomes for all students for each time a unit is delivered;
  - It is recommended that the words “encompasses all specified learning outcomes” be changed to “reflects all specified learning outcomes”, which would be a more reasonable requirement.
7. *Learning outcomes for each course of study and the methods for assessment of those outcomes are informed by periodic reviews (at least every 5 years), which take account of external reference points that are relevant to the course of study.*
- We suggest the removal of the requirement for periodic reviews “at least every 5 years”, and retain the requirement for “periodic reviews”.
8. *Methods of assessment are consistent with the types of learning outcomes being assessed and are capable of validly and reliably confirming that specified learning outcomes are achieved.*
- Reasonable .
9. *The grades awarded to students reflect the level of their attainment.*
- Reasonable.
10. *The grading of students’ achievement of learning outcomes for selected units within courses of study is referenced periodically (at least every 5 years) against the grading of students’ achievement in comparable units or courses in other Australian institutions.*
- This requirement will be a challenge and be difficult to implement;
  - Whilst there are some disciplines such as the Australian Business Deans’ Council (ABDC) that implement such benchmarking, not all disciplines have access to this type of activity or information;
  - How would relevant cross-institutional information be made available to universities to enable them to carry out the comparative grading/benchmarking exercise? Further, what is relevant cross institutional referencing – are we saying that we must ensure that a

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grade of High Distinction from UNSW carries the same standing as an equivalent grade from all other Australian universities? To do this meaningfully would require students to be assessed using a proportion of common tools.

- If a statement is required we would suggest – *“The grading of students’ achievement of learning outcomes for selected units within courses of study is reviewed against standards in relevant peer institutions periodically”*

### **Course Design (Coursework)**

1. *The provider utilises defined processes for designing and assuring the quality of the design of each course of study and the qualifications to which it leads.*
  - This standard has been streamlined and simplified with a focus on program design and quality assurance – a definite improvement.
2. *Processes for course design are approved and overseen by the provider’s peak academic governing body.*
  - This is a new standard that is reasonable.
3. *Course design encompasses the rationale for the course of study, course structure, modes of delivery, learning outcomes, methods of assessment, entry requirements and pathways, programmed student workload, articulation arrangements, exit pathways, pathways to further study and any compulsory requirements for completion and that these features of all courses of study are documented and publically accessible in a current version.*
  - This standard combines points 1.5 & 1.6 of the earlier version and more succinctly includes all aspects of course/program design into the one standard.
4. *The nature and scope of the course and the expectations for student learning are consistent with the qualification to be awarded and informed by the Australian Qualifications Framework.*
  - This standard is similar to the original but is clearer and more explicit in its requirements.
  - An understating of how “informed by” will be interpreted by TEQSA and others is important in determining whether we support or object to this standard.
5. *The content of each course of study:*
  - a) *is drawn from current knowledge and scholarship in relevant academic disciplines*
  - b) *includes study of the underlying theoretical and conceptual frameworks of the academic disciplines and the field of study, and*
  - c) *encompasses relevant emerging concepts that are informed by recent scholarship, current research findings and advances in practice (where practice is applicable to the field of study)*
  - This standard is similar to the original (focus on knowledge and scholarship) but has been separated into three sections for ease of identification
  - The language has been modified and streamlined making the requirements much clearer.
6. *Each course of study is designed to enable equivalent student learning outcomes regardless of a student’s place or mode of study.*
  - As per the original in section 1.9 with no changes.
7. *The peak academic governing body of the provider oversees periodic (at least every 5 years)*

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*review and improvement of the design of each course of study.*

- This standard reflects the requirements in 6.1 of the original standards and identifies more clearly who in the organisation is accountable i.e. academic governing body and links to Standard 2 in the revised version;
- Removes reference to programs being “systematically updated through internal and external reviews”, leaving institutions to decide on how these reviews are conducted;
- This standard would be more flexible and allow more institutional autonomy if it retained the original requirement for programs to be “systematically updated” rather than micro managing and stipulating that reviews be conducted “at last every 5 years”.

Yours sincerely

Iain G Martin  
Vice-President and Deputy Vice-Chancellor (Academic)

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