



**Higher Education Standards Panel
Response: Call for Comment
Draft Standards for Course Design and Learning Outcomes**

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

The University welcomes the Higher Education Standards Panel's effort to reduce duplication, and supports the objective of introducing a clearer and more consistent format for the Threshold Standards.

However, the University does not believe that the proposed framework is the best model, nor does it achieve its aims. The nine proposed areas in the organising framework contain overlap and duplication; the University suggests a simpler schema focusing on the areas of Provider, Quality Assurance and Outcomes.

While it is important to set baseline expectations for the sector, the University is concerned that the proposed organising framework will result in a large number of standards. While the University understands that the Panel is not proposing a standard for every example listed in each area, we trust that the Panel can appreciate our concern that, even if these are amalgamated, there would still be a significant number of individual standards for institutions to meet.

Also, while the University acknowledges that the Threshold Standards will apply to all students, we encourage the Panel to consider the requirements that Providers currently meet for different student cohorts (for example through ESOS and the National Code) to avoid further duplication.

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

In general, the introduction of reference points could be problematic; however, if the Panel wishes to use reference points to guide the interpretation and application of the standards then it may be a useful inclusion for Providers.

If reference points are adopted, then it is essential that any deviations between the listed reference points and TEQSA expectations be highlighted and clarified. For example, TEQSA requirements for documentation of courses taught in languages other than English vary from the AQF requirements; this should be clarified.

ESOS and National Codes should also be added to the list of Reference Points.

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

No.

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

In general, the University broadly supports the proposed standards.

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

Standard 3

- The University suggests that Standard 3 be the first standard listed as it provides a definition of course design which assists in the interpretation of the standards.
- This standard makes no reference to course content; this should be included in the definition as the standards following prescribe course content.

Standard 5

- The University would suggest that the standards relate to the highest levels of knowledge covered by a course, using the broader concept of “field” in preference to “discipline”.
- As expectations vary with qualification level, the phrase “as appropriate to the qualification level” should be added to this standard.

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

In general, the University broadly supports the proposed standards.

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

Standard 2

- This standard asks for the learning outcomes for each course to be “informed by international comparators”. This is a change on the previous standards that the University does *not* support. Requiring international comparators would be expensive for universities resource-wise and some courses do not have international comparators. This requirement seems internally inconsistent when other standards, such as Standard 7, that ask only “to take account of external reference points”. The University suggests that this standard be revised to read, “take account of external reference points”, in the same way as Standard 7.

Standard 3

- As expectations vary with qualification level, the phrase “as appropriate to the qualification level” should be added to this standard.
- A definition of “disciplinary and/or interdisciplinary knowledge” should be provided in Standard 3a.
- Specification of “communication skills” in Standard 3c is redundant and thus inconsistent with the more streamlined approach being taken to specifying standards.

Standard 9

- As institutions use the term “grades” differently the University suggests a definition is required.