
Higher Education Standards Panel Call for Comment No. 1, March 2013: University of Western Sydney Submission

*Prepared on behalf of UWS by Professor Kerri-Lee Krause, interim DVC Education
contact for further discussion*

Overview

The University of Western Sydney (UWS) endorses the principles outlined in recent Panel Communiqués, specifically:

- i. the need to reduce reporting burdens and to achieve efficiencies wherever possible by avoiding duplication of other regulatory processes and seeking evidence that would be available as part of normal institutional operations and quality assurance processes;
- ii. the value of respecting and facilitating institutional diversity, including diversity of educational offerings; and
- iii. the importance of streamlining and prioritising standards – i.e., focus on standards that pertain to quality educational outcomes, rather than a ‘shopping list’ of standards to address every provider characteristic.

1. Do you broadly support the proposed format for the standards?

UWS broadly supports the proposed format – that is, a list of standards, followed by reference points.

- There is considerable value in aiming for a more consistent approach and style.
- We support the goal of avoiding overlap and repetition among sets of standards statements.

Specific observations and suggestions for improvement include:

- i. Define the terminology used in taxonomic headings.
- ii. Review the ordering of standards to ensure conceptual coherence.
- iii. The Discussion Paper (p.2) refers to ‘a predominantly narrative style ... rather than lists of points’. This ‘narrative’ is not yet evident but we would value the opportunity to comment on it in due course, when the full suite of draft statements is released and the connections between and among them are made more apparent.
- iv. The Discussion Paper (p.2) states that ‘each point is labelled for ease of reference’: it is unclear to what this refers. Does it refer to the numbering system in the draft list or will there be some other form of ‘labelling’?

2. Do you support the inclusion of Reference Points as proposed?

We support the principle of Reference Points as part of the standards framework, however there are a number of issues that need to be addressed in relation to reference points. These include:

- a. Choice and relative weighting of reference points. There is no information in the draft document about whether the reference points are compulsory or optional, or whether there are criteria that can be used to assign relative weights to them.
- b. The status of reference points needs to be clarified. For example, in a diversified higher education sector, it is important for institutions to identify the external reference points that are relevant to their mission and student population. A dilemma for the sector is whose voice should have most and least weight in each field of education –

government, the professions, successful graduates, university academics, the university mission, incoming students, subject benchmarks elsewhere etc.

- c. In order to validate learning outcomes, UWS has identified a suite of reference points, advocating an appropriate mix that may include the following:
 - i. the ALTC discipline standards;
 - ii. the UK subject benchmarks and the outcomes of the European Tuning Project and OECD's AHELO project;
 - iii. external professional accreditation standards (when applicable);
 - iv. data on learning outcomes in the UWS Annual Course Reports;
 - v. the results of School Reviews, especially recommendations concerning future positioning in the discipline or profession concerned;
 - vi. the stated learning outcomes for courses of the same name in other universities that are attracting high ratings on the CEQ;
 - vii. the UWS graduate attributes;
 - viii. the results of studies of successful early graduates in the area concerned;
 - ix. the results of the UWS Employer Survey; and
 - x. input from External Course Advisory Committees.

- d. Identifying the AQF as a reference point is problematic unless the notion of 'reference points' is clearly defined and their status clarified. This is further discussed in response to point 5 below.

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

The only suggestion at this point is to label each statement as a 'standard' – ie Standard 1, 2 etc. This reinforces their status.

We have no other comment at this stage but it would be good to have the opportunity to comment further in the context of the full set of draft standards. It is unclear, for example, whether there will be a narrative component or whether the terms will be defined. There would be merit in including examples of the types of evidence that institutions might provide; for example in an Appendix.

Course design (coursework)

- 4. Do you broadly support the proposed standards for Course Design?**
- 5. Do you wish to make any suggestions in relation to the specific content of the standards?**

UWS broadly supports the proposed standards for Learning Outcomes. These standards are encompassed by existing UWS policies and procedures and, if required, relevant evidence should be available through the University's normal business operations and internal quality assurance processes.

Observations and suggestions for improvement are as follows:

- Standard 4: the reference to the AQF as an 'informing' mechanism is highly contestable in the current climate and we would welcome a sector-level discussion on the issue. If left as is, without further debate, this standard is ambiguous and would lead to uncertainty across the sector. In order to move forward with coursework planning and to be sufficiently nimble in an internationally competitive environment, we need clarity about the role, function and authority of the AQF. We support the need for balance in relation to the application of the AQF, but we also recognise the need for clarity to ensure that institutional and sector-wide progress in coursework planning and delivery is not impeded.

- As a national policy, determined after consultation across the various educational sectors, the AQF could be placed in a privileged position among the reference points, for example, though we are aware that not all will support this approach. In this circumstance the Standard could be more explicit about the weight that the AQF should be given among the range of reference points that apply for a particular course.
- Standard 5: we question the need for this standard. It is unnecessarily prescriptive and should be addressed in Standards 1 and 2 if the latter are adequately evidenced.

Learning outcomes (coursework)

6. **Do you broadly support the proposed standards for Learning Outcomes?**
7. **Do you wish to make any suggestions in relation to the specific content of the standards?**

UWS broadly supports the proposed standards for Learning Outcomes. On the whole, these standards are encompassed by existing UWS policies and procedures. However we have a number of observations and suggestions for improvement. These include:

- There is a structural omission arising from the schematic overview of higher education provision, presented in Communiqué Number 4, Nov 2012 (Figure 1, p. 2). The characteristics of HE provision refer only to outcomes. Increasingly, there is a need to focus on both outcomes and impact. There would be merit in the Panel considering how to engage providers in evidencing the impact of HE in a range of areas, including research, learning, teaching and the student experience.
- As noted above, terminology needs to be clarified. The terms ‘learning outcomes’, ‘specified learning outcomes’, ‘overall learning outcomes’, ‘course’ and ‘unit learning outcomes’ need to be defined and clarified. If the term ‘learning standards’ is also to be used, it will be important to distinguish between these terms.
- Some concern has been expressed among academic staff about the difference between threshold standards and various meritorious levels of achievement that might be awarded by institutions. This issue seems to be conflated in the language pertaining to courses and units.
- It would be appropriate to refer to the role of the provider’s peak academic body in reviewing and providing oversight for learning outcomes, assessment processes and standards, following the example of the proposed standards for Course Design.
- Standard 2 – ‘learning outcomes are...comparable’: this does not encourage diversity. There should be a core of comparable outcomes but institutions may add to these, depending on their distinctive course offering. This needs to be reflected in the wording of the standard.
- Standard 3 is redundant. If the conditions of Standard 2 are met and core comparability achieved, including with international comparators, there is no need to specify in this way. If necessary these could be included in reference points rather than specified as a standard in an already long list.
- Standard 6 is ambiguous. Not all assessment of student learning at unit level necessarily ‘encompasses all specified learning outcomes for each course of study’. This needs to be clarified. Possible wording might be as follows: *“The assessment of student learning, whether conducted at unit level, course level, or in combination, encompasses all specified learning outcomes for each course of study.”*

- It is good to see the focus on assessment and grading in Standards 7-10. We suggest reordering these points to ensure logical consistency. A suggestion would be 8, 9, 7, 10.
- Standard 7: There is a need to articulate the difference between 'external reference points' and 'reference points' if indeed the Panel plans to propose any difference. If not, we suggest consistent use of terminology. This highlights the value of defining and exemplifying the notion of reference points, as mentioned earlier.
- In standard 7, it is not simply the 'methods for assessment' that need to be periodically reviewed but the methods for articulating and assuring standards in the assessment process. This includes ensuring that academic staff are appropriately trained/calibrated.
- Standard 9: how does the Panel distinguish between 'grades awarded' and 'learning outcomes'? Standard 9 is poorly articulated at present and would be better rephrased in the language of 'academic standards'.
- Standard 10. We support the value of robust, collaborative peer review and benchmarking of standards. Standard 10 should include a combination of 'grading', 'methods of assessment' and 'comparability of learning outcomes' – in other words, comparability of both inputs (e.g., learning objectives, assessment tasks, grading criteria and guidelines) and outcomes is essential in order to ensure validity and reliability. A focus on outcomes is insufficient. The need for examining comparability of inputs as well as outcomes has been recognised and supported in both the OLT Learning and Teaching Standards Project and the Group of Eight Verification of Standards Project.

Thank you for the opportunity to provide this submission on behalf of the University of Western Sydney. We welcome the opportunity to discuss these important issues further, should an opportunity arise.

For further information and discussion please contact:

Professor Kerri-Lee Krause – interim Deputy Vice-Chancellor (Education) and Professor of Higher Education, University of Western Sydney

15 April 2013

Acknowledgements: I acknowledge and thank the UWS staff who contributed ideas and suggestions to guide the preparation of this paper.