Dear Dr Heywood,

Re: Higher Education Standards (HES) Panel Call for Comment on Draft Standards for Course Design and Learning Outcomes

We write in response to the Draft Standards for Course Design (Coursework) and Learning Outcomes (Coursework) released by the Higher Education Standards Panel in March 2013.

Australian Catholic University (ACU) is broadly in agreement with the Draft Standards as proposed by the HES Panel and supports the revision of both the format of the standards and the framework in which they are organised. ACU supports the proposed format, as the Draft Standards are quite comprehensive and at the same time also reasonably concise. However, previously, the issue with the Threshold Standards related to consistency, so ACU expects that the same style, clarity and pitch will be reflected in all future Standards, whether new or revised. In the future, ACU welcomes consultation prior to the implementation of any future amendments or revisions.
The specific responses in relation to the HES Panel consultation questions have been attached. We thank you for the opportunity to provide input to this important consultation for the higher education sector and please do not hesitate to contact us if you have any questions regarding our response.

Yours sincerely,
Australian Catholic University’s response to the HES Panel Call for Comment on Course Design and Learning Outcomes

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

Australian Catholic University (ACU) is broadly in support of the proposed format for the Draft Standards. The format seems to be quite comprehensive and at the same time also remaining reasonably concise.

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

The Reference Points are a helpful addition and, in the future, will provide guidance on how standards might be interpreted by providers and/or TEQSA. However, it is important that the Reference Points are developed in collaboration with the higher education providers and experts within the higher education sector, and not in isolation.

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

ACU does not wish to make any suggestions, as the format of the draft standards is quite satisfactory. However, in the future, the ACU welcomes consultation prior to the implementation of any future amendments or revisions.

4. Do you broadly support the proposed standards for Course Design? If not, why?

Yes.

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

The articulation of the Course Design Standards could be made less ambiguous. Section 1 refers to “defined processes for designing and assuring the quality of the design of each course of study”, however the extent to which guidance or regulation will be provided to assist the institution in the design, development and implementation of these “defined process” is unclear.
Furthermore, section 1 does not outline where, how or by whom these processes will be defined, or whether they will be framed in terms of specific ‘statements of purpose’ or rather as ‘statements of principle’.

Section 2 of the Course Design Standards refers to the “provider’s peak academic governing body”, however, ACU questions whether this refers to the provider’s governing body (i.e. University Council) or the sector’s governing body (i.e. TEQSA).

ACU considers graduate attributes or generic skills to be an integral element of course design, and as such, it should be incorporated as part of Section 3 of the Course Design Standards.

Under Course Design 5 (c), ACU believes that the content of the course of study should overtly state the inclusion of the ‘achievement of any necessary skills’.

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

Yes.

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

In section 3 (c) of the Learning Outcomes Standards, ACU believes that communication skills should be provided as an example and should be phrased using the appropriate language to ensure transparency in the expression.

Section 4 of the Learning Outcomes should read ‘demonstrated’ rather than ‘demonstrable’. Furthermore, Section 8 should refer to ‘fairly’ and ‘transparently’ as well as ‘validly’ and ‘reliably’.