

SCD RESPONSE TO HIGHER EDUCATION STANDARDS PANEL CALL FOR COMMENT (NUMBER 1, MARCH 2013)

FEEDBACK ON THE PROPOSED FORMAT

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

The Sydney College of Divinity broadly supports the proposed format.

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

The Sydney College of Divinity broadly supports the inclusion of Reference Points. However, we believe that Reference Points must exhibit great clarity. For instance, we are unclear about Reference Point (ii) for Learning Outcomes (Coursework). Does the reference to the “Office for Learning and Teaching discipline communities” refer to existing communities or communities that will develop over time, how are they constituted and what authority will they have?

Again, in relation to the AQF reference under both headings, would it be advisable to add “and any subsequent published revisions”?

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

We have no suggestions.

FEEDBACK ON THE PROPOSED DRAFT STANDARDS FOR COURSE DESIGN (COURSEWORK)

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

The Sydney College of Divinity broadly supports the proposed standards.

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

Standard 1 requires greater clarity concerning the source of “defined processes.” We believe that these processes should be defined by the provider and not imposed by an external authority.

Standard 3 is too broad.

- We believe that rather than focus on course design, Standard 3 should focus on curriculum design expressed as (1) Course Content; (2) Program Aims, Goals, Objectives; (3) Course-level Intended Learning Outcomes; (4) Teaching and Learning Activities; (5) Assessment; (6) Graduate Attributes, Capabilities, Qualities; (8) Evaluation. These features are taken from Veness (2010) (<http://www.ascilite.org.au/conferences/sydney10/procs/Veness-concise.pdf>)

- Other structural and regulatory features of the proposed Standard 3 such as course structure, programmed student workload, entry requirements and pathways, articulation arrangements, exit pathways, pathways to further study and any compulsory requirements for completion should be addressed in a separate standard. This separate standard might also include modes of delivery. However, this last feature does not seem to us to cohere with the other six features. A provider must have policies on modes of delivery but this feature is not course specific. It seems to us that it is an aspect of a registration standard rather than course design. TEQSA subject outlines require the provider to tick all applicable delivery modes for **each** subject. This is too inflexible and does not provide for continuous improvement.
- Veness's paper gives helpful guidelines to be addressed in each of the features of curriculum design. These guidelines are particularly helpful concerning assessment. For non-self-accrediting providers, the course accreditation processes developed by TEQSA are too detailed and too inflexible, and do not provide adequately for continuous improvement. Concerning assessment for each subject outline, TEQSA requires *"Examples of types of assessment tasks include: assignments; examinations; group projects; online quiz/ test; presentations; work-based projects; and reflective journals. Ensure that details of the types of assessment tasks are included such as specific topics, duration/ length/ word limit of assessment, and any specific formats."* This requirement for specific topics, duration/length/word limit of assessment, and any specific formats is much too prescriptive and inflexible. Veness offers a more open, flexible approach: *"What kinds of assessment will provide authentic measures of how well the student has achieved the course learning outcomes? What kinds of assessment will demonstrate that students are able to apply declarative knowledge in completing activities that test functioning knowledge? What are the relevant marking criteria and how do these reflect commonly understood standards –for program, course, discipline, profession, College or Faculty, and university?"*

Standard 6 could be modified as follows: "Each course of study is designed to enable equivalent student learning outcomes regardless of (1) a student's place or mode of study or (2) the language in which the course is delivered."

FEEDBACK ON THE PROPOSED DRAFT STANDARDS FOR LEARNING OUTCOMES (COURSEWORK)

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

The Sydney College of Divinity broadly support the proposed standards for Learning Outcomes

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

Standard 2: we endorse the principle of courses being **informed by** international comparators but we would not endorse the principle of courses being **benchmarked with** international comparators.

Standard 4 refers to "units." TEQSA uses the term "subjects." We suggest consistency of use.

Standard 9 refers to “grades”. This term has many variations on meaning, e.g. grade as a percentage; grades as A, B, C, etc.; grades as High Distinction, Distinction, etc.; grade point average. We suggest that “grades” be defined or that the standard be rewritten using unmistakable terminology.