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

QUT is broadly supportive of the proposed format.

The proposed approach reduces duplication and further clarifies threshold requirements that higher education providers must meet. The approach also integrates learning and teaching related standards within sensible themes which reduces the need for additional standards.

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

QUT is broadly supportive.

The proposed approach would clarify the role of the AQF in informing curriculum design, development and delivery and would provide scope for academically defensible flexibility based on interpretation rather than constraints imposed by semantics or prescriptive requirements that may have unintended consequences for students and providers. However, the revised legislation needs to explicate the status of the reference points and ensure that all additional reference points can be used to inform, but would not become another set of obligations that higher education providers need to follow. Institutionally defined benchmarks should also be recognised and encouraged as reference points. As standards are further developed and refined, we recommend that the Panel develop explanatory notes to illustrate how reference points could be applied (also refer to QUT’s response to Questions 5 and 7).

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

The format reduces duplication and improves consistency. As mentioned previously, the approach provides the opportunity to integrate related learning and teaching standards within sensible and understandable themes or categories.

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

QUT is broadly supportive.

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

The draft course design (Coursework) standards clarify expectations about curriculum and accreditation processes (i.e. what is important and what is not). Definitions of terms and further explanations will be needed to support operationalisation and assurance. For example, although the intended difference between the ‘programmed student workload’ description and ‘the student workload requirements’ in the current standards appears to be sensible it would be helpful if the new requirement were explained with respect to learning and assessment and also exemplified.

QUT recommends that further explanations and strategies to interpret, operationalise, achieve or demonstrate standards should be undertaken in collaboration with the sector and in consultation.
with relevant external/industry accreditation authority requirements, perhaps sponsored by the Office of Learning and Teaching as commissioned projects, along the lines of the work undertaken for the Discipline Thresholds Standards.

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

QUT is broadly supportive.

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

The draft standards for Learning Outcomes (Coursework) give greater clarity. The format communicates expectations (without jargon) for course teams designing awards, delivering programs, and assuring course learning outcomes. Explanation of particular elements and examples of good practices would help ensure wider understanding, operationalisation, and assurance. Consistent with Q5, QUT recommends that further explanations and strategies to interpret, operationalise, achieve or demonstrate standards should be given/developed in collaboration with the sector and in consultation with relevant external/industry accreditation authority requirements. Perhaps these could be sponsored by the Office of Learning and Teaching as commissioned projects along the lines of the work undertaken for the Discipline Thresholds Standards.