



Professor Derrick Armstrong
Deputy Vice-Chancellor (Education) and Registrar

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Professor Alan Robson AM
Chair
Higher Education Standards Panel
By email: info@HEstandards.gov.au

Dear Professor Robson,

Higher Education Standards Panel Call for Comment (Number 1, March 2013)

I write on behalf of the University of Sydney to offer the University's broad support for the panel's proposed approach to revising the format and style of the various standards that comprise the Higher Education Standards Framework. We have contributed to the preparation of the Go8 submission on the proposed examples, which we support, and are aware of the comments that have been provided separately by other Go8 universities.

Our overall assessment is also that the conceptual, design and re-drafting work that the panel is overseeing is making an important contribution by seeking to address the myriad of drafting and other problems that currently limit the value of the standards framework for the regulator, the regulated, and the consumers of the educational and research services offered by Australian higher education providers. This is important work. If left unaddressed, weaknesses in the standards that underpin the practical administration of the *Tertiary Education Quality and Standards Agency Act 2011 (Cth)* could threaten the overall integrity of the nation's legislated approach to regulation of the higher education.

We are therefore pleased that issues such as ambiguity in meaning, arbitrary distinctions between standard types, duplication, overlaps, differences in style, tone and format, and perhaps most importantly, conceptual and structural coherence, are finally being addressed systemically. Concerns such as these were raised repeatedly by parts of the sector when the initial threshold standards were being developed to ensure that TEQSA had a standards framework against which to regulate from the commencement of its regulatory powers. Time and other constraints meant that these weaknesses were not addressed at the outset, but assurances were given that an independent expert review of the entire framework would commence shortly after the commencement of the new regulatory arrangements. We are very pleased to see that this is occurring, guided by experts with such an extensive understanding of the Australian university sector. While we continue to have a range of concerns about the overall reforms to the regulation of self-accrediting higher education providers, this part of the continuing reform process appears to be progressing relatively well.

In the appendix we provide in summary form our response to each of the specific questions asked in the three consultation papers. You will see that like other Go8 institutions, our main concerns relate to issues of institutional autonomy and the risks of embedding the proposed reference points in legislative instruments. We would be happy to discuss any of these issues with the panel further if that would be helpful, and look forward to seeing the next iterations of these example drafts and the first drafts of the remaining standards,

Yours sincerely

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for
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Draft Standards for Course Design and Learning Outcomes – Discussion Paper

FORMAT

Q.1, Q.2, Q.3

The format achieves its stated aim of reducing duplication. The standards are clear. We approve the format.

COURSE DESIGN (COURSEWORK) EXAMPLE

Q.4, Q.5

Content

We broadly support the proposed standards for course design but make the following points in relation to the specific proposed elements.

1. The “defined processes” are appropriately captured by referring to the AQF and professional accreditation
2. Agreed
3. Agreed
4. Agreed. To preserve institutional autonomy and self-accrediting authority of some higher education providers, promote diversity and innovation, it is important that the standard ensures that providers may offer non-AQF awards.
5. Agreed. The particular emphasis on “emerging concepts” in c is pleasing; otherwise it could appear that the course is not enquiry-based. It could be strengthened still further by re-wording c as “*requires students to reconceptualise existing knowledge and concepts informed by recent scholarship,....*”
6. Agreed. This requirement will mean that assurance of equivalent learning outcomes will need to be verified.
7. Agreed in part. The academic governing body of the provider should oversee periodic review and improvement of course design. We question whether the standard needs to specify the frequency.

Reference points

We support the concept of using the “reference point” approach to simplify the content of the standards, and directing providers and others to sources of information that may be of assistance in interpreting the standard. We raise the following concerns about this proposal. First, including such reference points formally in a legislative instrument will make it more difficult and slower to change the reference lists than some other options. Second, there will need to be a clear and consistent process applied by the panel regularly to add or remove reference points listed for any given standard in the instrument itself or elsewhere. Third, what happens in the event that the requirements of a professional accreditation body become unreasonable from the perspective of providers? Entrenching references to these in legislative instruments may have the unintended consequence of giving more power to the accrediting authorities than is appropriate. As an alternative, we suggest that consideration be given to including in each standard a reference and link to a register of relevant reference points that is maintained by the panel, with individual entries reviewed regularly for the appropriateness as reference points according a clear process and set of criteria.

LEARNING OUTCOMES (COURSEWORK) EXAMPLE

Q.6, Q.7

Content

1. Agreed
2. This standard suggests there will be a comparator or benchmark partner for every course of study. This may not be the case in interdisciplinary and emerging fields, and therefore may be an impossible standard to meet in all cases. We suggest the words “*where possible*” after “*international comparators*”.
3. It is not clear whether ALL of the standards need to be met. For example a BA graduate will not necessarily need to meet the requirements of employment related to the field of study, as these are necessarily unknown. Does (d) relate only to professional courses?
4. Agreed.
5. Agreed.
6. We understand what is meant here, but it could be worded more simply. Moreover, we question whether it is possible for a single unit of study to encompass ALL specified learning outcomes for a course of study (unless a capstone unit).
7. Agreed in part. The learning outcomes for each course of study should be reviewed periodically, taking into account external benchmarks. We question whether the standard needs to specify the frequency.
8. Agreed, though it could be more obviously worded to distinguish this standard from Standard 6.
9. Agreed.
10. Agreed in part. The grading of students’ achievement in selected units of study should be reviewed periodically, with these reviews taking into account external benchmarks. We question whether the standard needs to specify the frequency.

Reference points

See comments on reference points generally provided above in relation to the Course Design (Coursework) example. If reference points are to be included in the legislative instrument establishing each standard (or elsewhere as would be our preference) we recommend that consideration be given to including institutional graduate statements and other strategic documents as possible reference points. This would serve to support the principle of institutional autonomy, and would also demonstrate the panel’s and the Government’s recognition of the importance to the sector of diversity and institutional mission differentiation. It would, for example, help to balance the homogeneity and limitations of the learning outcomes contained in Office of Learning and Teaching type Teaching and Learning Statements.