

## **Group of Eight response to HESP's call for comment (number 1, March 2013)**

### **HESP's approach to redrafting Standards**

The Group of Eight (Go8) welcomes the opportunity to make comments on the approach taken by the Higher Education Standards Panel (HESP) to formulating new Threshold Standards, and on the draft standards for course design and learning outcomes circulated in March.

The Go8 supports and is grateful for HESP's consultative approach to the development of new Standards. We share HESP's view that the Standards Framework as a whole needs to be thoroughly reviewed and rewritten. In general, we support the Panel's plan to redraft Threshold Standards to make them more effective, easier to understand, and fitter for purpose. The Panel's aims of imposing a clear organising principle on the new Standards, ensuring a consistent format and reducing duplication are commendable and the Go8 fully supports them. The Panel's approach envisages a set of Standards that is more efficient and effective, but also more open to diversity and innovation in the higher education sector. We believe that this will be an important gain, and is a significant and necessary regulatory reform.

Nevertheless, the Go8 remains concerned about the Standards Framework's interaction with the autonomous, self-accrediting status of universities. The new Standards Framework as it applies to universities must be based on a genuine respect for universities' autonomy and power to self-accredit. It should impose the least administrative burden that is consistent with effective regulation that maintains the quality and reputation of the Australian higher education sector. New Standards should not be overly prescriptive, and must avoid prescribing current (or even obsolescent) practice as mandatory for the future. A revised Standards Framework should allow universities to adapt and react as nimbly as is feasible to a rapidly changing and increasingly global higher education sector.

The Go8 broadly supports the Panel's proposed format for Standards. We would urge the Panel to consider further reduction of duplication and redundancy in the new Standards Framework. For example, the proposed Standard for Educational Experience includes items which are performance outcomes which might be better included in other sections of the Standards Framework.

We also support the inclusion of Reference Points as described on page 2 of HESP discussion paper 'Draft Standards for Course Design and Learning Outcomes'. We agree that it would be helpful to include in revised Standards a series of Reference Points to give higher education providers (HEPs) some guidance in how to meet Standards, and how to demonstrate that they have met them.

However, we would advise that the definition of reference points be strengthened to ensure that reference points do not come to be seen as de facto integral components of the Standards. We also believe that any reference points included in the Standards should be subject to a formal process of scrutiny and approval by HESP. It would not be appropriate to include reference points in a legislative instrument without such scrutiny.

### **Course Design Standards**

The draft Standard for Course Design is, in general, sound and appropriate. It may be helpful to add a preamble which explains the scope of the concept 'course design' for the purposes of the Standard. It will be important to avoid duplication between Course Design Standards and Course Accreditation Standards.

Reference to the Australian Qualifications Framework is included in both the standards and as a Reference Point. This seems an unnecessary duplication which has the potential to cause confusion about the status of the AQF. It would be preferable for the Australian Qualifications Framework to be a reference point only. This would necessitate rewriting paragraph 4.

At paragraph 3, the meaning of 'programmed student workload' is unclear and needs clarifying.

At paragraph 7, we would urge HESP to consider a longer minimum period between reviews for those courses that exceed three years in duration.

We would suggest a wording change to paragraph 3: the last part of the paragraph (starting 'and that these features of all courses of study are documented') reads awkwardly and might be better expressed as 'and includes documentation of these features of all courses, and publication of resulting documentation in a current version'.

### **Learning Outcomes Standards**

In general, the draft Learning Outcomes Standard is sensible and well constructed.

However, we believe that the draft Standard assumes a simple relationship between courses and units that does not reflect actual practice at large universities with broad and heterogeneous course offerings that allow students to put together varied and flexible courses of study that meet their needs and interests. A given course of study may be associated with a large number and range of units. More importantly, a given unit of study may form part of several different courses.

In particular, we are concerned that the requirement in paragraph 4 to link learning outcomes of a course of study and its component units – while reasonable in itself – may be implemented in a bureaucratic way that imposes a significant additional administrative burden on universities.

We have similar concerns about the requirements for assessment specified in paragraph 6. Furthermore, it does not seem reasonable to require in all cases that assessment of student learning at the unit level 'encompasses all specified learning outcomes for each course of study' of which it can be a part.

It is unclear what the intention of paragraph 9 is. It could be interpreted in quite a simple way as testing that the level of attainment was accurately reflected by the grade or alternatively testing the comparability of grades across the institution. As not all providers will have the opportunity to test the comparability of grades across disciplines in the institution it would be fair to assume that the first interpretation is intended, but this should be clarified.

Consideration should be given to including Reference Points for English Language Proficiency and Academic Literacy Skills that can assist with the interpretation of the “communication skills required” included in 3c.

The Go8 commends the Panel for including a requirement that grading be referenced against grading in comparable units and courses at paragraph 10. We believe that this is a vital component of an effective approach to assuring the quality of learning outcomes. The Go8 is currently piloting a Quality Verification System (QVS) that benchmarks the grading of students’ achievement of learning outcomes in similar courses at different Go8 universities. We would be happy to engage in further discussion with the Panel on the aims and design of the QVS and its potential contribution to the Panel’s deliberations about how best to benchmark grading of student achievement.

Finally, we would query the wording of paragraph 3c: this sentence may be better expressed as ‘the development of generic skills and attributes – including communication skills – in the context of the field of study’.

### **Conclusion**

Thank you once again for the opportunity to provide comments. The Go8 is keen to participate in and support the development of improved, more effective standards for higher education. We would be happy to discuss the draft standards for Course Design and Learning Outcomes, and the general approach to redrafting Standards, further. Please do not hesitate to contact in the first instance Mr Mike Teece, Director, Policy at the Group of Eight Secretariat on , or at

---