

Polytechnic West welcomes the opportunity to comment on the approach and style of standards being considered by the Higher Education Standards Panel. We are encouraged by the panel's open consultative approach and we make the following comments based on the consultation paper.

## Format of the draft standards

1. PWA endorses the taxonomic approach being taken by the Standards Panel in establishing a comprehensive framework for the higher education standards. We encourage the Panel to ensure that they take a holistic approach to determining the standards required and note with concern that the draft standards forwarded for consultation appear to be highly atomistic and risk creating an artificial and prescriptive approach to course approval and accreditation. We point out that these standards should apply to all providers regardless of who is responsible for approving and accrediting it, that is, the standards should be applicable to both self-accrediting and non self-accrediting providers.
2. PWA proposes that the Standards Panel consider developing a set of principles to guide the development of the standards. These could include the following:
  - Standards will set the minimum criterion to be met. They will be a “floor” and not a “ceiling”
  - Standards will be descriptive rather than prescriptive and will support innovation and continuous improvement in course development, approval and accreditation.
  - Standards will be holistic and cover whole processes focusing on key requirements for assurance of quality
  - Standards will allow for flexible responses that fit with an institution's size, delivery mode, philosophy, student demographic, stakeholder needs/feedback and course portfolio without impacting negatively on the institution's autonomy
3. We suggest that rather than the setting standards for disjoint aspects of course development and approval, the Panel consider establishing standards that cover the key processes involved in designing, developing, approving and accrediting a course. Adopting a holistic approach such as we propose would ensure that provider's autonomy remains protected while ensuring standards are met. A suggested taxonomy that would encourage this could be:
  - Course Design and Development
  - Course Approval
  - Course Accreditation
  - Materials Development
4. Within this taxonomy the standards should be formatted to include:

- a heading denoting the aspect the course development/approval/accreditation the standards covers
- a statement of minimum requirements the providers must meet
- expected behaviours
- evidence statements setting out how the provider could demonstrate that the standard was met

PWA supports the inclusion Reference Points. We believe these would be helpful to providers in determining whether their practice met the minimum standard.

### Learning Outcomes and Course Design Standards

5. PWA is concerned that the Standards Panel has chosen to develop two sets of standards that are components or subsets of the course development and approval process. We are concerned about the use of this approach which could lead to the proliferation of atomised standards rather than the coherent, holistic approach that we believe is necessary to support institutional autonomy and sector-wide continuous improvement. Further, PWA is concerned that trying to breakdown an overall process into its component parts risks the quality assurance process becoming an audit process governed by the use of standardised checklists. We believe adoption of such an approach is unsuitable for higher education courses and qualifications.
6. PWA does not support the proposed separate draft standards for Course Design and Learning Outcomes as we believe these are two different aspects of the same standard. We believe the higher education sector would be better served if the Standards Panel developed a Course Design Standard with the following components:
  - The course has a clear purpose and outcome statement (graduate profile) that specifies what a graduate knows and can do
  - There is a clear philosophy that underpins the course that is consistent with its purpose, content and intended outcome
  - The course is underpinned by a sound body of knowledge associated with the discipline(s) covered by the course and there is evidence that recent scholarship and research has been taken into account in designing the course
  - The course is well structured with a clear rationale for its core and elective components
  - The course is structured to enable students to progress in their learning, developing their skills and knowledge as they progress through the course
  - The course enables students to develop their academic literacy in English or where the course requires, in a specified language
  - Each component of the course has clearly specified learning outcomes that set out what the learner will be able to do as a result of completing that component
  - Assessment tasks for each course component are appropriate for the learning outcomes and level of the course component

- The combined assessment components of the course enable a judgement to be made as to whether the graduate meets the course outcomes (graduate profile) as a whole
  - Pre and/or co-requisite learning requirements are specified
7. Following this Standard, PWA believes the Standards Panel should adopt a Course Approval standard with the following components:
- The higher education course is academically sound and presents a coherent program of study
  - The assessment methodology is appropriate to the level and content of the course
  - The course supports recognition of student's prior learning and does not place undue barriers to students
  - Delivery methodology is appropriate for the course
  - The entry criteria for the course are appropriate
  - The course prepares students for independent learning and provides an academic pathway to further study at a higher level
  - The course has been benchmarked, peer reviewed and has the support of the academic community
  - Appropriate stakeholder feedback (including industry and/or professions as appropriate) shows that there is a demand for the course
  - Professional accreditation has been received where appropriate
8. A course accreditation standard would be the next part of the standards taxonomy and would focus on the provider's ability to deliver the course that has been approved and would assure that the provider has the necessary staff, physical resources, equipment, learning resources and learning support to enable the course to be delivered using the proposed delivery mode and students to successfully complete.
9. In our proposed taxonomy there would be a final standard for course materials development which would include requirements for research/scholarship to inform teaching, textbooks and teaching resources to be current with recent scholarship in the discipline area, evidence of peer review by discipline experts and evidence that assessments have been validated and assessed as being relevant, fair and reliable.

## Conclusion

PWA's welcomes the review of the standards framework and the opportunity to provide feedback on the proposed approach and format of the standards.

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