



Swinburne University of Technology

Response to the Higher Education Standards Panel Call for Comment

Swinburne University of Technology welcomes the review of the Threshold Standards for Course Design and Learning Outcomes and the opportunity to provide a response to the Draft Standards.

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

Swinburne broadly supports the improvements that present the standards in an improved specific and directive manner, providing greater clarity of expectations for the thresholds. The format has reduced the overlap and repetition that exists within the current Standards.

Swinburne's suggestion is that a glossary might be a useful adjunct to ensure that the terminology used is clear.

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

Swinburne does not see particular value in the current list of Reference Points. Of more value might be the use of reference points that link to specific information sources either through a direct reference or URL link. The Panel's definition of Reference Points: *"The use of Reference Points is seen as a mechanism that gives some guidance to providers and regulators while not being prescriptive or seeking to standardise a provider's approach to meeting the standards."* does not fit with the inclusion of the AQF as this is a legislated Framework.

It is likely that Reference Points might be common to more than one section and suggest creating one list for all sections rather than one for each section. Useful links might also include relevant sources such as to Good Practice information, resources from Learning and Teaching grant projects or similar points of reference that inform good practice considerations in course design and learning outcomes.

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

The new format is of a higher standard than the format in the current document.

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

We broadly support the proposed standards for Course design. We have several suggestions in relation to specific content (see Q5).

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

Standard 6:

We suggest that the current wording *'Each course of study is designed to enable equivalent student learning outcomes regardless of a student's place or mode of study'* should be changed to *'Each course of study is designed to enable equivalent student learning outcomes regardless of a student's location of study or the mode(s) of delivery employed'*

It would be useful if the term 'equivalent' and 'regardless of place..' were better defined. Is it the intent to standardise learning outcomes nationally? This might be very difficult, and not desirable, especially for courses that do not have professional body regulation. Professional bodies often determine if the learning outcomes meet the threshold requirements for professional practice, rather than expect 'equality' of these between courses offered by different institutions.

Standard 7:

We suggest combining this point with point 2 as they both relate to the role of the governing body in ensuring the quality of the course.

Q 6. Do you broadly support the proposed standards for Learning Outcomes? If not, why?

We broadly support the proposed standards for Learning Outcomes and have provided suggestions in Q7.

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

Standard 2:

We suggest that the meaning of *'informed international comparators'* be more fully defined and guidance provided on how this might be evidenced. If 'informed' simply means to have considered/looked at international comparators, then there appears to be limited purpose for inclusion in the Standards.

In relation to “*comparable with those courses that lead to the same or similar qualification*”, can the panel either cross reference this to the requirements in the design and review under Course design or indicate intent or requirements for how such a comparison be achieved and the expectation for the degree of alignment in the comparison that would be expected. In its current form, it appears to be driving an expectation that all Higher Education providers become very much the same in their learning outcomes for the same or similar courses.

Standard 3:

We suggest there should be some recognition that not all study should lead to a specific professional practice in a discipline field as there are many other valid reasons for undertaking study in an area including self-improvement and personal interest. The dot points provided by the Panel address knowledge, skills, generic skills and the application of generic skills, but not the application of disciplinary/interdisciplinary knowledge and skills *per se*. Without the inclusion of the application of disciplinary/interdisciplinary knowledge and skills, this point is out of alignment with the AQF, which specifies such application.

Standard 6:

The design of this statement could be interpreted as implying that all course learning outcomes must be addressed in each piece of assessment. The intent of this point may need to be more fully explored and possibly more appropriately expressed.

Standard 8:

Earlier units within a course will not necessarily confirm that the learning outcomes have been achieved. This point works well for unit learning outcomes but this is not clearly stated so the implication seems to be that this standard relates to course learning outcomes. The intent should be better qualified.

Standard 10:

- We have a number of concerns, specifically:
 - Issues of intellectual property, particularly in a competitive environment
 - the willingness of other institutions and their academics to participate in meeting this requirement
 - the ability of one institution to compel other institutions to participate if this is required
 - the organisation and resources required to enable this work to be done
 - the scale/scope of this task/requirement

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