1. The proposed format of the standards

The proposed format for the standards works well with clear and mostly unambiguous statements. We endorse the greater focus on outcomes and reduced emphasis on processes as standards.

The proposed organising framework provides a greater coherence and more comprehensive coverage of the activities of higher education institutions. It should have the effect of reducing the overlaps and gaps in the current threshold standards. Further, it should remove the current lack of apparent status of the non-threshold standards which are also duplicated, in part, in the threshold standards as noted by the HE Standards Panel.

The working definition of reference points presents them as guidance to providers and regulators ‘while not being prescriptive’. We generally support this approach, but note that some caution would be needed in interpreting these reference points: the examples given currently have varying degrees of authority, and an individual institutional interpretation may not match that of TEQSA.

It would be helpful for TEQSA to provide information on which reference points or sources of evidence it would regard as most compelling.
2. The content of the standards

Learning Outcomes Standards

6. The assessment of student learning, whether at unit level, course level, or in combination, encompasses all specified learning outcomes for each course of study.

The words ‘in combination’ are essential to this standard, allowing for a variety of assessment methods and topics across subjects within the course that will collectively contribute to achievement of all learning outcomes.

10. The grading of students’ achievement of learning outcomes for selected units within courses of study is referenced periodically (at least every 5 years) against the grading of students’ achievement in comparable units or courses in other Australian institutions.

The word ‘selected’ is important in this standard, but it would be useful to have some guidance on an appropriate number of subjects to be selected. Moreover, the absence of uniform results reporting across the sector, including letter grades and classes of grades each with a variety of numerical equivalents, makes benchmarking and standards comparison complex.

Course Design (Coursework) Standards

1. The provider utilises defined processes for designing and assuring the quality of the design of each course of study and the qualifications to which it leads.

2. Processes for course design are approved and overseen by the provider’s peak academic governing body.

While it is important that providers have rigorous course approvals processes in place that are overseen by the academic governing body, these standards relate to processes not outcomes.

3. Course design encompasses the rationale for the course of study, course structure, modes of delivery, learning outcomes, methods of assessment, entry requirements and pathways, programmed student workload, articulation arrangements, exit pathways, pathways to further study and any compulsory requirements for completion and that these features of all courses of study are documented and publically accessible in a current version.

The detailing of all of these elements of course design in a standard may impose undue constraints on innovation in future. Is it possible for a list of elements of course design to be included in a schedule or definition that could be more easily updated from time to time? The standard might then read ‘Key design features of all courses are documented and publicly available in a current version’.
4. The nature and scope of the course and the expectations for student learning are consistent with the qualification to be awarded and informed by the Australian Qualifications Framework.

We question whether it is appropriate to include a 'reference point' in a standard.

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Yours sincerely,

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