

## UTS submission to

### Higher Education Standards Panel Call for Comment Number 2, May 2013

UTS appreciates the opportunity to respond to the Higher Education Standards Panel Call for Comment Number 1, March 2013.

Broadly, UTS supports the approach to the revision of the standards and the work conducted to date by the Panel. UTS also supports the development of Standards for Research, Research training and Learning Outcomes (Research Training) within the Higher Education Standards Framework.

A number of detailed comments are made below.

#### ***Draft Standards for Research***

##### ***Q1. Do you broadly support the proposed standards for Research? If not, why?***

Yes.

##### ***Q2. Do you wish to make any suggestions in relation to the specific content of the standards?***

*Standard 4.* UTS agrees that the concept of research active should be defined by each provider, but notes that within institutions there will need to be some flexibility given the diversity of research practices across disciplines.

#### ***Draft Standards for Research Training***

##### ***Q3. Do you broadly support the proposed standards for Research Training? If not, why?***

Yes.

##### ***Q4. Do you wish to make any suggestions in relation to the specific content of the standards?***

*Standard 2.* UTS appreciates the guiding principles of the Discussion Paper that state “standards for research training must contemplate a diverse set of educational circumstances and, accordingly, should not be overly prescriptive”. With this principle in mind, UTS proposes that Standard 2 should be rewritten in order to reflect the differences between doctoral programs and other higher education programs. Our position is that there are various kinds of doctoral learning activities. In addition to ‘formal’ coursework subjects there are often structured activities, such as seminars and workshops, that may not be formally assessed.

Furthermore doctoral programs are time-based (EFTSL) while undergraduate and postgraduate programs are credit-point based.

The wording for Standard 2 should therefore include ‘Coursework *as defined by the provider...*’

*Standard 3.* UTS is very supportive of requiring research students to have at least two supervisors.

*Standard 4.* It is unclear whether this standard includes Honours courses as “a course of study that leads to a research higher degree”. UTS recommends this standard be rewritten to remove the ambiguity.

*Standard 8.* The detailed goals outlined in points (a) through (e) in this standard are overly prescriptive, which goes against the guiding principle referred to above. UTS proposes that the effect of the standard would remain if these points are removed.

***Draft Standards for Learning Outcomes (Research Training)***

***Q5. Do you broadly support the proposed standards for Learning Outcomes (Research Training)? If not, why?***

Yes.

***Q6. Do you wish to make any suggestions in relation to the specific content of the standards?***

Standard 2. The requirement for every course's learning outcomes to be informed by international comparators is unworkable; creating an enormous compliance burden on providers with very little evidence of major advantage to students studying in Australia. It is highly likely that providers will undertake benchmarking but for the standards to be so prescriptive is not useful.

UTS would also like to see further clarity around the relationship between these standards and the AQF Doctoral Degree descriptors.

***Q7. Do you wish to make any Overall or General Comments about the form, style, scope or any other aspects of the proposed set of research-related standards?***

No.

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