27 June 2014

Professor Alan Robson AM  
Chair  
Higher Education Standards Panel  
By email: info@HEstandards.gov.au

Dear Professor Robson,

Higher Education Standards Panel Call for Comment (Number 3, 23 April 2014)

The University of Sydney is grateful for the opportunity to comment on the proposed revisions to the current Higher Education Standards Framework ('the Framework').

As indicated in our response to the Panel's previous calls for comment, we strongly support the careful, systematic and consultative approach that the Panel continues to take in revising the Framework.

Overall, we believe the Panel has achieved its aim to make the standards simpler, culturally-compatible, more internally consistent and clear, and more accommodating of different provider types.

Once in place the proposed new Framework should assist the regulator, providers and students. Even in advance of the proposed commencement in 2016, the draft revised Framework provides a useful checklist to guide providers in relation to their quality assurance strategies.

Please find attached some specific comments in response to the Panel's consultation questions. We trust these are helpful as the Panel prepares the final draft revised standards for consideration by the Minister for Education.

Please do not hesitate to contact me if you require anything further from the University of Sydney.

Yours sincerely,

Signature removed for electronic distribution

Professor Pip Pattison  
Deputy Vice-Chancellor (Education)
University of Sydney response to the Higher Education Standards Panel Call for Comment (Number 3, 23 April 2014), June 2014

Question 1. Do you support the proposed Framework? If not, why not?

Yes.

We support the proposed new Framework for reasons including the following:

- it represents a significant overall improvement on the current ‘interim’ Framework
- it makes sense to have a single set of minimum regulated standards
- it is important that each standard is prepared with regard to the regulatory principles of necessity, risk and proportionality, and the policy objective of minimising regulatory impacts
- the focus on the educational experience and outcomes of students, rather than on processes
- the clarification provided about status of the Australian Qualifications Framework, and the inclusion of reference points relevant to some standards
- the harmonisation of the standards relating to the provision of courses to international students currently contained the Education Services for Overseas Students (ESOS) regime
- the inclusion of Part C and D to guide providers and the regulator and clarify the meaning of key terms.

Question 2. Do you wish to make any suggestions in relation to the specific content of the Framework?

Yes.

Part A

1. Student Participation and Attainment

1.1 Admission and 1.3 Orientation and Transition.

We read these as overlapping to some degree and as being in minor tension. Standard 1.1.1. requires that students have the necessary academic preparation and skills, whereas Standard 1.3.2. requires assessment of preparation during orientation and transition, including the identification and provision of additional support. A more nuanced and consistent wording might be achieved by replacing ‘ensure’ in Standard 1.1.1. by ‘are designed to ensure’.

1.2 Credit Recognition and Prior Learning

1.2.1. It would be better to refer to a particular event in the enrolment process such as ‘prior to confirmation of enrolment’ than ‘during enrolment’. It would also be unfortunate if this standard were to have the effect that a student cannot seek credit for prior learning after enrolment. A full stop could be inserted after ‘policies’ with an additional sentence along these lines added: ‘Where students seek such assessment prior to enrolment in the course of study, the outcome is confirmed prior to confirmation of enrolment in the course.’

1.2.2. We suggest that a clause similar to that in the ESOS National Code (Part D) 12.1 (b) [below] requiring that credit be accepted by the student is inserted:

‘provide a record of the course credit to the student, which must be signed or otherwise accepted by the student, and place it on the student’s file.’
1.4 Progression

1.4.2. It is important that all students admitted to a course of study with a provider are treated equally. However, success, progression and completion rates will invariably differ between fields of education for academic reasons alone. We suggest deleting ‘field of education’ and adjusting the standard to read: ‘Students enrolled in the same course….

1.5 Learning Outcomes and Assessment

1.5.6. The principle of independence is supported. However, the notion of what constitutes an ‘external’ examiner should be defined by the institution according to the research context. In some areas adjunct appointees may be the people who provide the most relevant and up-to-date expertise, provided that the provider ensures appropriate independence is maintained.

1.5. Reference Points. We recommend against including the requirements for professional accreditation or learning outcomes statements as relevant reference points. In doing so we note the following points:

- Principle xiv in the HESP’s Background Paper states that ‘The standards will not address specific discipline content or discipline-related curriculum materials’. Accreditation requirements clearly refer to discipline content, and even though reference points are seen as non-mandatory, inclusion of them as reference points draws disciplinary content into the domain of Standard 1.5. The same applies to learning outcomes statements developed by discipline communities or professional bodies.
- There is no recognised process for assigning or understanding the credibility or breadth of consensus relating to these learning statements and professional accreditation requirements. It is not appropriate for legislative instrument to refer to documents that are created outside of any formally recognised and governed process.

If such requirements and statements are to be included as reference points, we would recommend that only those that are approved according to a process that is formally recognised by government (such as the national registration scheme administered by the Australian Health Practitioner Registration Agency, or the Australian Institute for Teaching and School Leadership’s Graduate Teaching Standards) are recognised by the Standards. Alternatively, in recognition that signing up to an accreditation process is the choice of a provider, reference point iii could be amended to read ‘Where an institution has determined to seek professional accreditation for a course of study, the requirements for professional accreditation and registration where applicable’. Such wording would also accommodate the fact that many courses have multiple professional accreditations, including international accreditations.

2. Learning Environment

2.1 Facilities

Footnote 11 brings ‘facilities in which work placements are undertaken’ specifically within the scope of Standard 2.1. We believe the standard needs to provide some flexibility in relation to work places and other sites outside of the direct control of the provider. While the principle that physical and electronic facilities are fit for their education purpose is entirely reasonable, providers invariably have little control over the standards of the infrastructure available in the workplaces and other settings (for example remote field work settings in Australia or overseas) where students may spend time as part of their studies.

2.1.1. We recommend that standard is amended to start ‘Campus facilities…’.
2.1.2. Linking with Standard 3.3.3., it is important that Standard 2.1.2. cannot be read as requiring institutions to provide students and staff with unlimited data plans, ubiquitous wireless access on campus, or means of guaranteeing access to the internet outside of the provider’s facilities/campuses.

We recommend the wording is amended to read: “Except when working on field trips, work placements or in other locations not under the direct control of the provider, secure access to electronic information and adequate electronic communication services are available continuously to students and staff.”

3. Teaching

3.1 Course design

3.1.5. The focus of the current wording on accreditation required for eligibility to practise may deter providers from offering non-accredited courses in professional disciplines. We therefore recommend amending the standard to read: "Where a student enrols in a course of study accredited by a professional body, the course continues to be accredited by that professional body."

Moreover, providers should be required to make clear to students the professional accreditations any course has, and the jurisdictions, if any, for which the course provides an accredited pathway to practise. To that end we recommend including: "Where a course of study provides education in an area of professional practice that is subject to professional accreditation requirements, the accreditation status of the course is explicit in all course materials, as are the jurisdictions, if any, for which the course provides an accredited pathway to practice."

3.2 Course Delivery

3.2.2.d. We recommend replacing 'desired' with 'course or unit of study' for consistency.

4. Research and Research Training

4.1 Research

4.1.1. In footnote 21, we recommend replacing 'a course of study leading to a Bachelor Honours qualification' with: 'research components of Australian higher education qualifications at any level'. This will ensure the standards recognise that there are now many coursework awards with research components.

5. Quality Assurance

5.1.2 and 5.3 Monitoring, Review and Improvement

We would make a general comment that while ongoing review of the quality and currency of all course offerings is vital, compliance with these proposed review standards could have a considerable direct and indirect cost impact, particularly on large providers with many courses. We therefore trust that in selecting the 7 and 3 year timeframes for review cycle standards the HESP has weighed these likely costs against the principles of necessity, risk and proportionality. In disciplines where external professional accreditation review processes are the norm, the requirements could also result in wasteful duplication. In regulating against these standards, it will be important for TEQSA to clarify the extent to which satisfaction of the professional accreditation requirements of different professional accrediting authorities would be counted for the purposes of these proposed standards.
5.1.2. Re-accreditation is potentially ambiguous as it may be taken as referring to external accreditation. We suggest clarifying as ‘Courses of study accredited by self-accrediting institutions are subject to a cycle of review and re-accreditation of not more than seven years.’

5.2. Academic Integrity. We recommend that the reference point is removed as it may suggest that providers do not need to be constantly monitoring world best practice in relation to maintaining academic integrity. If a reference point is to be included, the Australian Code for the Responsible Conduct of Research would be more appropriate.

Parts B, C and D.

We support the intent and content of these Parts.

Question 3. Do you wish to make any overall or general comments about the Framework?

No. Please refer to our covering letter and response to Question 1.