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To Whom It May Concern

**Re: DASSH feedback on the *Discussion Paper: Developing a Framework for Teaching and Learning Standards in Australia and the Role of TEQSA***

The Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH) is the authoritative agency on research, teaching and learning for the Arts, Social Sciences and Humanities (ASSH) in Australian and New Zealand universities. DASSH represents the Deans of 44 university faculties, that teach over one third of university students (140,000) Australia wide. We commend the work that DEEWR is doing in developing a learning and teaching standards framework and we welcome the opportunity to provide feedback to the above discussion paper.

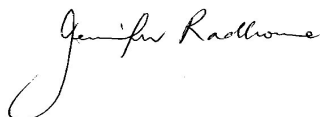
DASSH supports the distinction between teaching and learning standards as outlined in this discussion paper and the broad principles shaping TEQSA's role. However, we are concerned about the following:

- Less than optimal engagement with the university sector due to the timing and lack of involvement of discipline experts.
- The multi-disciplinary and diverse nature of arts and social science degrees. For example, a generalist degree, such as the Bachelor of Arts, will have a large number of discipline specific majors.
- Acknowledgement and incorporating work already completed in this area. In particular the standards projects for history and creative arts as an outcome of the LTAS project.
- Developing external testing or assessment of students and the complications if a student should fail.

We hope that the development of a teaching and learning framework will consider the importance of the discipline communities in developing standards and assessment, especially in subject benchmarking and peer reviews. There is a further need to clarify what learning standards encompass and how they will be used.

We would welcome the opportunity to discuss our concerns with you in more detail.

Yours sincerely



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## **THE AUSTRALASIAN COUNCIL OF DEANS OF ARTS, SOCIAL SCIENCES AND HUMANITIES (DASSH) SUBMISSION TO DEEWR'S DISCUSSION PAPER: DEVELOPING A FRAMEWORK FOR TEACHING AND LEARNING STANDARDS IN AUSTRALIA AND THE ROLE OF TEQSA**

### **SECTION 1: THE POLICY CONTEXT FOR TEACHING AND LEARNING STANDARDS**

1. The discussion document understands standards in terms of agreed minimum levels (or thresholds) and distinguishes teaching and learning standards. DASSH agrees that this distinction is merited and that assessment of learning standards requires different methods of verification from teaching standards.

DASSH is concerned that the emphasis of the first part of the discussion paper inadequately recognises both the diversity among University degrees— from broad, generalist awards, like the Bachelor of Arts (BA) or Bachelor of Science (BSc), to closely circumscribed professional degrees that are independently accredited by professional bodies— and the diversity of academic disciplines that students may study within their degree program. In generalist degrees, such as the BA, aspirational and threshold teaching and learning standards are understood (although not always codified) through the expectations and assessment practices within disciplines. As a result disciplinary experts are central to any discussion about threshold learning standards.

DASSH believes that disciplinary communities are much more than “other involved parties.” The TEQSA standards process should expressly identify discipline communities as the third pillar along with TEQSA and the Institutions. The document reflects the recommendations of the Bradley Review report, which advocated “subject benchmarking” in disciplines by “reflecting the judgment of those who are expert in it.” The ALTC Learning and Teaching Academic Standards (LTAS) project (referred to in the covering letter) provides “proof of concept” for a process to develop learning standards. Any adequate learning standards that address learning and teaching of disciplinary content would need to be informed by a similar process, directly engaging disciplinary communities.

Sets of learning and teaching standards that aim at standards relating to “defined areas of knowledge” will need to attend to both traditional disciplinary areas (music, history, sociology, etc) but also the range of more or less well-defined interdisciplinary studies areas, such as Australian studies, cultural studies, media studies. For the articulation of the appropriate standards relevant to learning and teaching in these areas to be more than very superficial would require genuine engagement with the community of academics who are involved. To meet the principle of respect for the autonomy of institutions, the different ways in which disciplines and studies areas are grouped needs to be reflected in expert input into the process.

DASSH notes the work that DEEWR has conducted in developing the University Experience Survey (UES) and Collegiate Learning Assessment (CLA) as a means of assessing teaching performance and quality in the Compacts process. DASSH is concerned that these measures be refined to ensure that they encompass the broader cultural and humane goals of liberal arts learning as there is a risk of over-emphasising

generic skills that are thought to lead to employability. Australia needs graduates who: 1) are aware of the complexity of the human condition; 2) appreciate that understanding human culture, values, social structures and knowledge can be pursued through a range of disciplinary approaches; and 3) value both the skills and the substantive knowledge they gain from their university education. There is a risk that learning and teaching standards measures will effectively “dumb down” the curriculum by extracting common features of the educational process. Surveys of student learning should be able to distinguish clearly what the university experience adds to or develops in student understanding. This factor goes to the direct question of discipline standards but not generalised cultural capital, as some universities will always be able to rely on students bringing this to the institution.

2. DASSH welcomes this distinction between learning and teaching standards. It is important to treat the two as distinct and that student attainment standards can be realised through a range of different teaching methods. Given the differences in institutional missions and cohorts of students associated with different Universities in Australia. It is appropriate for student attainment (learning standards) to be assessed using a common approach, while leaving institutions to establish the appropriate teaching standards to meet their mission and Compact. Ultimately, there is a logical connection between teaching and learning, but their standards should be separately assessed. Distinguishing teaching and learning standards also helps clarify the distinct focus of the AQF qualification standards (learning standards) and provider standards relating to the National protocols.

There remain concerns about how learning standards are to be developed and verified. The Go8 have indicated they will draw on their own verification system. What will happen in the case of providers that are not Go8 universities? How will that process occur?

3. The seven principles for TEQSA are a good starting point, however they will need elaboration, refinement and extension.

**Principle 1** should be refined to recognise both the autonomy and diversity of institutions (as articulated in each institution’s mission based compact) as well as innovations in teaching that are not narrowly curriculum based, but include learning and teaching support and modes of teaching practice.

**Principles 2 and 3:** As indicated above, the discussion paper needs to consider more deeply the vital role of discipline-specific skills, knowledge and content in developing both teaching and learning standards, as a result, a recognition of academic expertise within discipline communities is needed to extend principle 2 and to fill out Principle 3. It should be noted that a research professor in a discipline is not necessarily an expert in teaching and learning for the purposes of this process. This is an area where we can learn from the early mistakes of the British QAA system.

It must also be noted that within broad generalist degrees (like the BA) a major sequence of study is often approximately one third of their overall three-year degree. It is appropriate for the institution (or Faculty or Division) to oversee the attainment of the skills and understanding expected of a BA graduate, while also requiring discipline-specific attainment of learning in a major sequence (so a BA student in Philosophy will be expected to have learned something different from a BA student in Chinese).

It cannot simply be the case, nonetheless, that majors in the Arts and Social Sciences are judged against the British QAA Benchmark Statements or the European Tuning Process. European degrees are discipline specific (excluding the combined Honours of the British system). Australian discipline based standards should be aligned but at AQF Level 7 they cannot be the same from a benchmarking perspective.

**Principle 4:** it would be useful to indicate triggers for review (is review just a matter of passage of time, or changes in the disciplines, or in the sector?) Early media reports suggested a time frame of seven years. This might be appropriate for an institutional audit but not within a discipline area or program of study.

**Principles 5 and 6:** What is perhaps most important is that any development of standards encourage institutions to deliver good QA/QI processes internally. It would be very damaging to students if the mechanisms for assessing learning were such that a student could successfully pass all units in a course and for there to be a real prospect that the student is found not to have attained sufficient learning to merit award of a degree. DASSH strongly objects to a graduate test of learning that is disengaged from student assessment.

**Principle 7:** There appears to be an ambiguity in the discussion paper between disciplinary and educational expertise.

## **SECTION 2: A BRIEF REVIEW OF INTERNATIONAL AND DOMESTIC DEVELOPMENTS**

4-5. This review does not mention moves by most institutions to develop Graduate Attributes and the ways that they have been articulated and monitored – in many cases by being embedded in assessment. Curriculum renewal has resulted from both institutional considerations arising from attention to Graduate Attributes and discipline-specific revitalisation of curricula. It is not at all clear how the learning standards relate to Graduate Attributes. A significant amount of effort has already been made at institutions and through funding bodies like ALTC to consider what attributes a graduate should have when they successfully complete a degree. The threshold outcomes or standards developed in the LTAS project have considerable overlap with these developments. Learning standards are distinct from Graduate Attributes and curricula, but should be linked as aspects of a learner's education and a University's mission.

Representatives of DASSH were engaged with developing the ALTC LTAS statements in History, Geography and the Creative Arts. It was recognised at the outset that the LTAS process would be a trial project to establish the capacity of the respective disciplines to establish agreed-upon national standards of threshold learning outcomes in those disciplines in bachelor degree programs in Australia. This was achieved in less than one year.

More recently, in the discipline of History, work has continued to develop learning outcomes for Honours degrees (AQF 8) and Masters (AQF 9). In the Creative Arts, as well as the undergraduate learning outcomes, a suite of learning outcome statements for coursework Masters degrees was established in 2010.

In the one year available for this project, it would have been impossible for the disciplines to begin to contemplate how these learning outcome statements might be implemented in terms of curriculum design. However, as the Discussion Paper acknowledges, the learning outcome statements that were achieved have broadly reflected the disciplines' views of what graduating

students might be expected to know and do. DASSH is of the view that the on-going process in establishing disciplinary learning outcome statements should be given continuing support.

Since the publication of the ALTC's Learning and Teaching Academic Standards Project Final Report [2011] and the associated discipline reports [none of which are acknowledged in the Discussion Paper bibliography], work has continued to explore how the agreed-upon learning outcome statements might be incorporated into the curriculum design and assessment criteria in degree programs at the institutional level. While this is likely to be a long-term project, the process is being facilitated by the ALTC's recent support for the establishment of discipline networks. In DASSH's case, the Associate Deans (Learning and Teaching) Network was formed in 2009.

These initiatives present TEQSA with an opportunity to engage with the sector and, in particular, to seek ways to resolve one of the singular problems facing those universities with broad generalist degrees. In degrees, such as the BA and BSc, there are likely to be large numbers of discipline-specific majors offered within a one-degree program. Reconciling the learning outcome expectations of the disciplines with those embodied in the whole-of-degree is an issue confronting institutions in these generalist degrees.

The discussion paper suggests LTAS statements "are presented as guides to curriculum design only", and further, "they explicitly exclude reference to teaching modes, learning activities, or assessment methods." This statement is true but the way this has been represented makes it appear as an oversight by the LTAS project. This is at best a misunderstanding of the LTAS process. The LTAS Threshold Learning Outcomes were the first steps in a multi-phase process that is already seeing discipline communities engage with these issues.

The Discussion Paper should recognise that in the eleven broad disciplines represented in the LTAS project, there has been widespread national endorsement of the project process and outcomes both at the institutional and discipline level.

### **SECTION 3: STEPS TOWARDS AUSTRALIAN TEACHING AND LEARNING STANDARDS**

6. Broadly this architecture appears appropriate, however, as indicated in response to 1 above, it is important to attend to interdisciplinary and innovative studies areas. In contested areas of knowledge it may be difficult to correctly identify the appropriate bodies for engagement. There is little specificity in the document about what the expert review process will be nor how "fine-grained" the expertise may be in this process. These need elaboration.
7. This structuring of standards statements doesn't appear to distinguish between broad course level standards and those that relate to the content of disciplines.
8. There is considerable literature available to question whether testing measures knowledge, especially where what is relevant in discipline specific knowledge is the analysis and articulation of conceptual relations. In a well-designed education system, learning does not end at the completion of the degree; rather students develop and reflect on their learning over time, so it is unclear when and how testing would be appropriate. Similarly there is little research to support a good measure of the difference that study makes to student knowledge, partly because of the temporal lag between studying for a degree and integrating the different elements of a student's learning experience. Standardised tests of generic skills misunderstand that students learn transferrable 'generic' skills through learning in the context of something specific. Disaggregation of skills and content may lead to 'dumbing down' of the curriculum and

learning. Attainment testing that does not recognise the differences between cohorts of students attending different institutions is likely to merely institutionalise existing rankings of Universities. Universities that attract high achieving students are likely (regardless of their teaching or learning support) to have students who perform well on attainment tests.

9-10. External peer review processes and portfolios of student work would be much better ways of holistically understanding teaching and learning standards. Although this approach, is resource intensive, it is better that we are confident in the reliability and meaningfulness of standard measures, than to efficiently and cheaply measure nothing of significance. Teaching and learning standards, themselves, should be subject to peer review, similar to the humanities' process used in the ERA assessment.

### **ANY OTHER RELEVANT ISSUES (NOT INCLUDED ABOVE)**

DASSH strongly supported the threshold learning outcomes statements developed by the ALTC LTAS project because of the width and depth of the consultation process. This process developed a set of outcomes that have the capacity for successful implementation in ASSH faculties across Australia. DASSH believes that the LTAS project models an excellent process for developing standards that are relevant to and can be owned by ASSH disciplines.

The LTAS project approached the collective of diverse disciplines in the creative and performing arts (in one case) and the distinct disciplines of and history and geography (in the other) to bring forward a set of usable and acceptable standards and outcomes. DASSH supported in particular the inclusion of discipline communities and disciplinary experts in the consultation, discussion and decision-making. This process is necessary for any implementation of future standards.

The final standards' statements in the LTAS projects are a comprehensive resource for discipline leaders in ASSH faculties, giving access to benchmarking data, case studies, research and institutional links, and a valuable survey of our discipline peers.

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