

DASSH response to the Call for Comment on the proposed Higher Education Standards Framework (HESF)

DASSH welcomes the opportunity to comment on the proposed revisions to the Higher Education Standards Framework (HESF) and broadly endorses the proposed Framework.

The proposed HESF presents a more streamlined, coherent and accessible approach than the existing Framework. The introduction of the Standards for Higher Education, replacing aspects of the current Provider Registration, Provider Category, Provider Course Accreditation and Qualification Standards, represents a constructive improvement as it consolidates the key features of the HESF in a rational, concise and manageable way.

DASSH notes and particularly welcomes the removal of the concept of 'Non-Threshold Standards' from the Framework.

The articulation of the seven 'Domains' of the Standards for Higher Education accurately represent the fundamental features of Higher Education, compared to a regulatory-driven compliance approach, enhance the ease and utility of referencing the Standards, and avoid unnecessary duplication.

DASSH supports the Framework's focus on Standards outcomes/outputs, rather than processes/inputs. That said, we would note that such a move might release non self-accrediting private providers from appropriate examination, especially in regards to the required level of quality assurance processes and provisions.

We also note the revised wording of Standard 3.2.2a, which proposes staff with "equivalent relevant academic or professional experience and expertise" as an acceptable threshold, and thus recognises the diversity of staffing required, particularly in professional and highly technical fields.

Standard 4.2.3a describes a principal research supervisor as a person "who holds a doctoral degree or has equivalent research experience, is active in research and is publishing in a relevant field or discipline." DASSH suggests that the interpretation of this statement is possibly unclear – Does the need to be active in research apply to someone who holds a doctoral degree as well as someone who has 'equivalent research experience'?

This Standard also does not account for the growing use of recently retired academic staff as members of Research Higher Degree (RHD) supervisory teams; which is only likely to become more common as RHD numbers across the sector increase. It would make sense to take into account the valuable contribution and expertise such supervisors could contribute, even though they are no longer active in research.

John Germov
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