Staff and Educational Development Association

Response to the Higher Education Academy's Consultation Paper:
'A Standards Framework for Teaching and Supporting Student Learning'

The Staff and Educational Development Association (SEDA) was formed in 1993 as the professional association for staff and educational developers in the UK, promoting innovation and good practice in higher education. Our membership is highly experienced in the design and development, assessment (including external examining) and accreditation of programmes in learning and teaching for higher education, in developing and providing continuing professional development opportunities, and in institutional planning for strategic development.

Consultation Question 1: Is the purpose and rationale for the proposed framework acceptable to your organisation?

1. SEDA is committed to the value of professional development for teachers in higher education, and believes in the importance of nationally shared standards for professional development and practice.

2. We are pleased to see that underpinning professional values remain an integral part of the framework. These have been an important and effective element in professional standards for higher education teachers since 1992, and they contribute substantially to the Academy's goals of combining inclusivity and flexibility (3.3) with creativity, innovation and continuous development (4.1), and consistency and quality (4.1). It is reassuring to see continued emphasis on underpinning professional knowledge. This confirms teaching in higher education as a scholarly and professional activity, rooted in research rather than simply in experience.

3. We welcome the continuity with the earlier ILTHE framework of the five areas of work. The higher education sector has become familiar with these five areas in the last few years. It is therefore helpful to promoting teaching and learning in the sector that the Academy has retained what is widely seen as an effective structure and division of activity.

4. We appreciate that developing a national standards framework for teaching and supporting student learning in higher education is an important and complex task, and one that the Higher Education Academy is concerned to get right. Although we recognize the wish to move ahead with the framework, the current proposal is not yet suitable for implementation; it will not deliver the aims which the consultation document presents in paragraph 4.1. Level one and level three do not map onto higher education institution structures, policies and practices, and these two areas in particular will require some revision. We explain our concerns with the proposal in more detail below.

Consultation Question 2: Are the statements of standards and the related areas of activity acceptable and workable as a common reference point for all institutions? Do they enable institutions to add criteria to reflect your particular aims and learning outcomes?

5. There needs to be flexibility in the quantity and combination of requirements to be met at level one, to address the rich diversity of roles and staff contributing to the student learning experience in UK higher education. There is a lack of inclusivity in the present framework, which insufficiently recognizes the diversity of teaching staff, in terms of roles and responsibilities, and entry points into higher education teaching. Specific examples of this are given below in paragraphs 6-7, and in paragraph 13.

6. We are concerned about the proposed requirement at level 1 to demonstrate all five areas of work. While we agree that evaluation of practice and continuing professional development should be required at all levels, the sector employs many teachers who do not work in all four remaining areas, but nevertheless perform important and effective roles. The framework at present will either exclude from professional recognition people who make a significant contribution to student learning, or will lead to areas such as assessment being fudged. We would prefer to see flexibility in the quantity of areas of core knowledge required, for the same reason (as was the case under the previous ILTHE guidelines).

7. Disciplines that recruit new (full-time and part-time) teachers who are experienced, mature practitioners in fields outside education (e.g. in clinical and health related disciplines) may feel that the expectations of level one are at particularly at odds with their professional experiences, which enable them to operate at a sophisticated conceptual level immediately.

8. We are also concerned about the description of level 1: "Demonstrates scholarly *performance* and a *developing awareness* of the student learning experience…" (our emphasis).

9. We question what is meant by the term 'performance', in relation to the five areas of activity. 'Performance' clearly maps onto lecturing but it is less clear what the term means in the context of designing and planning learning activities, supporting student learning, designing assessment, giving feedback, developing effective environments and student guidance and support systems, and evaluation of practice. It is therefore unclear how helpful the word 'performance' is when considered in the light of all five areas of activity. This difficulty is magnified in the context of the core knowledge and professional values.

10. *Awareness* is an unexpected term to find in a description of a standard, because of its subjectivity, and the difficulties of demonstrating a cognitive state, and indeed teaching or assessing it with reliability. *Developing* presents similar difficulties: a standard which states that someone has entered a process of cognitive change will be very difficult to measure, to assess, and to 'quality assure'. In order to meet the earlier stated purpose of 'supporting consistency and quality of the student learning experience' (4.1) we suggest that this level description is revised.

11. There are no citations given in the text to substantiate the claim that these proposals are informed by recent research (5.3). Research into student learning and professional development is a complex field which emerges from many different disciplinary traditions. It would be helpful to know which particular work the framework draws on.

Consultation Question 3: Could the proposed framework be implemented within institutional CPD policies and practices?

12. We would welcome revision of the third level, which we do not consider to map onto the career patterns of academic staff. The current proposal implies that the highest level of teaching is managing and leading teaching, but does not at present recognize there must also be scope for teachers to continue to improve <u>as teachers</u>, whether through specializing or simply by continuing to improve, e.g. towards teaching-based promotions, or institutional (or national) fellowships. The current proposed account of the top level of teaching as managing or leading teaching does not fit well with the proposals on CPD also published by the Academy, which allow continuing development and improvement in one's current role throughout a career. We would warmly welcome a third level which describes both continuing to improve as a teacher, and managing and leading teaching, and suggest this would enable the framework to be far more effectively assimilated into institutional CPD policies and practices.

13. Furthermore, we are concerned about the appropriateness of level three for the career progression of staff who support student learning but are not necessarily on academic contracts. As the consultation document title specifies 'supporting student learning' we assume that it is intended to cover the professional development of staff such as technicians, librarians, learning technologists, learning support staff who may contribute substantially and directly to student learning. CPD opportunities are also important to these staff, but many will not have opportunities to lead and manage learning and teaching.

14. We would also encourage there to be explicit mention of the importance of research-led, or research-informed teaching, incorporating the concepts of research into disciplinary areas, research into pedagogy, and research into higher education.

15. We recognise that there is mention of scholarship in the values, but would welcome further explanation of whether the sixth proposed value (8.4, p5) '*Commitment to incorporating the process and outcomes of relevant research and scholarship*' is a different value from the first value identified, '*Commitment to scholarship in teaching*' or whether it replaces it. This clarification would be helpful for institutions wishing to align policies and practice with the Academy's framework. We realise there is ambiguity in the terminology associated with this area, and many of the concepts identified in this paragraph and paragraph 13 overlap; the standards framework is an ideal opportunity to underline the importance of all these overlapping areas in unambiguous language.

16. In the context of Etienne Wenger's work on communities of practice (E. Wenger, 1998, *Communities of Practice*, Cambridge University Press), we would welcome

explicit emphasis in the framework on the importance of collaboration. On an individual level, collaboration provides support. At an institutional level, Wenger's thesis is that organisational change only occurs through communities of practice. 'Creativity, innovation and continuous development' (4.1, consultation document) are only achieved collectively, and therefore we suggest more emphasis on this aspect of professional development.

17. The implementation of the framework will depend on nationally agreed assessment processes, but there is no mention of assessment and accreditation processes in this document, and in particular, how institutions could be expected to map the framework into their own validation processes. This omission is remarkable in the context of 166 higher education teaching programmes accredited by the Academy. We welcome the reference under the heading 'Relationship to the current accreditation framework' at level two, to postgraduate certificate programmes as the normal qualification (p.4 consultation document), because it confirms widespread existing standards.

18. We note that there is potential ambiguity in the examples of staff groups who might take programmes at level one and level two. The examples given suggest that staff with full academic posts, but who are new to HE, would take programmes at level one. As we have indicated above, the difference between staff on programmes leading to associate practitioner status and to registered practitioner status has been based on the breadth of responsibilities, not length of service. New members of academic staff, whatever their previous experience, have quality assurance and enhancement responsibilities, are frequently involved in course design (including assessment design), and have extensive legislative responsibilities (under human rights legislation, and the data protection and freedom of information acts). We would not wish the extent to which these staff are prepared for their roles to be compromised by their taking only level one programmes. It is possible we have misinterpreted the standards framework in this respect but we would welcome clarification on this point.

19. The staff and educational development community looks forward to continuing to help develop, assure and increase the quality of teaching and the supporting learning in higher education. SEDA looks forward to working with the Academy to devise and implement ways to help those running qualification courses in higher education teaching to implement the new Academy standards and CPD framework.

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on behalf of the Staff and Educational Development Association
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